

Brussels, 13 May 2024

RE: GBTA feedback on the Environmental Labelling Scheme for Aviation

TO: Aviation Policy Unit of DG MOVE

On behalf of the Global Business Travel Association (GBTA), I would like to thank you for inviting GBTA to take part in the workshop organised by DG MOVE and EASA on April 9th in Brussels on the aviation environmental labelling scheme developed under ReFuelEU. This initiative will directly impact the ability of business travellers to select lower carbon flights, which is why we are keen to share our feedback and views on the approach taken by the European Commission.

According to the latest "[State of Climate Action in Business Travel](#)" report from the GBTA Foundation, only 28% of Travel Managers say they are currently using their corporate booking tool to encourage travellers to make more sustainable choices. An additional 32% are however exploring such opportunity. For most travel managers, this specifically includes displaying emissions at point of sale (72%). The label developed by EASA could potentially facilitate the expansion of these practices, making more business travellers aware of the environmental impact of their trips before booking them and incentivising them to choose the more sustainable options.

To fulfill this objective, GBTA would like to stress the following considerations, to be taken into account by DG MOVE in the development of the aviation environmental label:

Extension of the scope to all flights departing from and arriving to the EU

For corporate travellers, it's essential to be able to compare the emissions information from flights regardless of whether the full trip takes place in the EU or not. Therefore, we believe the scope of the scheme should cover flights both departing from and arriving to the EU. **Otherwise, the label would give an incomplete picture that can be highly confusing for passengers** and could lead to passengers jumping to the wrong conclusion that labelled flights are more sustainable than unlabelled ones which will not necessarily be the case.

Alignment with CountEmissionsEU

In addition, to prevent inconsistencies between different pieces of EU legislation, the label should be closely aligned with the CountEmissionsEU methodology, which is set to **harmonise the framework for calculating and reporting greenhouse gas emissions across the transport sector in the EU**. This would make it easier for travellers to compare the emissions of different travel options, including aviation, with a harmonised calculation system.

Accounting for the use of sustainable aviation fuels

Since the use of sustainable aviation fuels (SAF) will feed into the calculations for the scheme, it is **critical to understand how this will be verified and accounted for**. The label should make it easier for tools like airline websites, GDSs and corporate booking tools to harmonise the way they account for the use of SAF in their display of emissions at the point of sale.

Data and calculation transparency

Corporate travellers and travel managers need transparency on carbon emissions from air travel. Because of this, given that the EASA calculations will include estimates based on airline data, it is important that this data alongside **the end-to-end calculation logic and methodology is made available**. In addition, the way the estimation of flight emissions is displayed may not be immediately understandable by the bookers with the consequences that will be overlooked. A **more transparent and easier-to-read label with a benchmarking scale will be more effective** in order to create better awareness, consciousness and to influence the decisions of transport users and create incentives to use more sustainable transport options. This can drive innovation and push travel organisers to offer more sustainable options.

We thank you again for your willingness to engage with GBTA and other stakeholders in the development of the labelling scheme and we remain available to answer any questions you may have on the business travel's sectors views on it.

We look forward to our continued cooperation.

Yours sincerely,

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Global Business Travel Association (GBTA)