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Comments from International Air Transport Association (IATA), concerning a proposal on Climate declarations

The International Air Transport Association (IATA) is a global trade association, representing some 290 airline members across the world and accounting for 82% of total global air traffic. Our members include approximately 50 airlines operating air services to/from Sweden. IATA supports many areas of aviation activity and helps to formulate industry policy on critical aviation issues to drive a safe, secure, and a sustainable industry. For more information on IATA and its work, you can visit www.iata.org

IATA recognizes the need to address the global challenge of climate change and the international aviation industry has adopted a set of ambitious targets to mitigate CO₂ emissions from air transport. At our recent Annual General Meeting, the global airline industry committed to Net Zero carbon emissions by 2050. Several European airlines are among the frontrunners of this engagement.

IATA welcomes the opportunity to comment on the Swedish Government's proposal on a new requirement of climate declarations for air traffic. IATA agrees with the concept that consumers are entitled to be aware of the environmental impact of their travel. We also acknowledge the fact that many airlines already voluntarily display CO₂ emissions information during the ticket booking process. Increasingly, airlines are also offering consumers with the option to fully compensate for the emissions associated with their travel through the purchase of sustainable aviation fuels or carbon offsets. IATA supports the commitment of the Swedish Government to reduce the climate impact of aviation, and the need to provide transparent and reliable information to passengers. However, after analysing the Swedish proposal, IATA recommends that Sweden refrains from mandating the provision of climate declarations.

A global industry needs international standards. This is crucial to avoid a patchwork of regulations, prevent competitive distortion, and maintain global connectivity. Standards simplify and harmonize all the procedures that are required for international air travel to function effectively. A patchwork of national or regional measures will only impede efforts to achieve sustained emissions reductions by distracting focus from activities that achieve real progress, and increase the administrative burden and cost of compliance for airlines that often operate in dozens of different jurisdictions without any measurable environmental benefit.

The introduction of a Swedish mandate that requires climate declaration for air travel would only add to the confusing plethora of different carbon calculation methodologies and carbon calculators. It would not lead to a standardized, reliable, or transparent means of comparison for consumers. For a fair comparison - a harmonized global standard for the calculation of passenger CO₂ emissions is necessary. In this regard we wish to mention IATA's ongoing work together with airlines and industry stakeholders to develop an industry recommended practice methodology to calculate per passenger CO₂ emissions. The methodology was developed using industry best practices and alignment with existing standards to improve calculation accuracy, transparency as well as simplicity. The methodology is expected to be adopted as an industry recommended practice shortly, and can be used by any



organisation, including airlines, travel agents, travel management companies, etc., that wish to display CO₂ information to customers.

The proposal that a Swedish authority – the Swedish Environmental Protection Agency - should be responsible for monitoring, supervising, and setting the standards for calculating the emissions per passenger is not a viable solution. The airlines operating to and from Sweden are based around the world, and the situation is similar for the travel agents. Even if the proposal stipulates that the regulation should apply equally to foreign carriers and national carriers, the reality of practical application is more complex, particularly where foreign carriers or agents have a limited or non-existent presence in Sweden and raises the risk of distortion of competition.

Should the Swedish Environmental Protection Agency mandate that their own calculator be used by all affected organizations it would likely result in the provision of less reliable information which would ultimately undermine the intention of providing consumers with a meaningful comparison of the climate impact of their travel choices. Many airlines operating in the Swedish market are already displaying emissions values for individual flights or itineraries that are derived from actual operational data, which is often independently verified and regularly audited. Any calculator developed by the Swedish Environmental Protection Agency would need to rely on modelled information and likely assign generic values based solely on the type of aircraft operated for a specific flight. Airlines operating the exact same aircraft type can achieve significantly different levels of fuel efficiency and fuel burn due to a wide variety of different factors. For example, two airlines operating the exact same aircraft on the same route under the same weather conditions may have an actual difference in fuel burn that can easily exceed 10 percent. A model would therefore not provide a fair comparison, and any request by Swedish authorities for emissions information from foreign carriers would conflict with international principles agreed by States at the International Civil Aviation Organization (ICAO).

The cost of having the CO₂ per passenger information displayed by airlines is not negligible and is disproportionate to the effects this practice is likely to generate. The Swedish proposal on declarations includes detailed information on greenhouse gas emissions from the production chain for the fuel used by the carrier to carry out the journey, g CO₂e / passenger kilometre, kg CO₂e / passenger for the entire journey, the high-altitude effect, and a reference value. This information should not only be displayed in the airline's own communication channels but also provided to the travel agents for their resell. For network airlines, that provide a wide range of destinations through a network with different connections, interlining, and codeshares, this will be even more complicated than for point-to-point airlines. E. g.; if a network airline or a travel agent sells a journey from Stockholm to Sydney, the journey likely consists of several legs, with different aircraft and potentially also several airlines in collaboration through code sharing. A specific requirement from a single jurisdiction such as the proposal in question, without any international standard or harmonized approach to support it, would only divert limited financial resources away from other measures that would actually improve environmental performance.

The global aviation accounts for approximately two per cent of carbon dioxide emissions (source: IPCC). In addition, there are other effects on the climate from emissions and discharges from aviation at high altitudes. Nitric oxide emissions, soot particles, sulphur oxide, and water vapour discharge affect the climate. However, there is still great uncertainty about these effects on the climate, and the effect may vary greatly depending on various factors (e.g., time of day, topography being overflown, high-altitude air-moisture content, etc.). Leading scientific experts, European Institutions and the aviation industry all agree that more research is needed to better understand these factors. Given these uncertainties, it is not recommended to include a flat multiplier on CO₂ emissions to represent the high-altitude effects in the calculation of emissions of a given flight until global scientific consensus on such a value can be achieved.

IATA and its members are committed to reduce the emissions from aviation. To mitigate the global climate challenge, all industries must contribute to reduce the emissions. Aviation is responsible for 12% of the CO₂ emissions from all the transport sources, compared to 74% from road transport. Nonetheless, this proposal only targets air travel. In addition, the proposal includes a requirement of a reference value, that should facilitate the comparison by highlighting how the climate impact of the flight relates to the climate impact of alternative travels and modes of transport. This would unreasonably increase the airlines' area of responsibility outside their own field of competence



and impose a disproportionate burden on air transport in relation to other modes of transport that comparatively have a much greater climate impact.

To conclude, IATA agrees with the benefits of a transparent system that allows the passenger to get an overview of the emissions related to a given flight, but the foundation on climate declarations should lay on global standards and recognize that many airlines and the aviation industry are already voluntarily disclosing this information. The Swedish proposal on climate declarations on air travel cannot be implemented without a significant risk of distortion of competition and will not contribute to a standardized, reliable, and accurate flight comparison that would be needed to provide comparable data. Therefore, we recommend the Government to refrain from introducing such regulation.

Last but not least. It is no secret that COVID-19 has devastated the aviation industry more than any of the post-war large-scale health, financial or terrorism crises. After an extremely challenging 18 months where the industry struggled to successfully restart, we are now focusing on its recovery, boosting connectivity, and building back better. This ambition can only materialize through partnerships, particularly between governments and industry. To promote sustainable aviation - a transport mode where decarbonization is a difficult challenge - a combination of Sustainable Aviation Fuels (SAF), radical airframe designs, cutting edge propulsion methods, efficiency gains, carbon capture technology and offsetting measures will be needed. The mechanisms to deliver change are crucial. Governments must lead with incentives – with more carrot and less stick, all the while reinforcing international collaboration and harmonization. As we seek to reconnect the world safely and sustainably – its people and economies - we are calling for Government support and partnership.

IATA welcomes further dialogue and discussion with the Swedish Government on how we can best work together to achieve our climate commitments and emissions reductions targets. On the specific topic of climate declarations, IATA would encourage future engagement between the Swedish Government and industry experts to ensure that any related measures realize their intended outcomes and do not unnecessarily divert attention and resources away from activities that are critical to the global aviation industry's commitment of achieving net-zero emissions.

A handwritten signature in blue ink, reading "Catrin Mattsson", with a horizontal line extending to the right.

Catrin Mattsson
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IATA