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Director General

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Mr. Maroš Šefčovič
Executive Vice-President for European Green Deal, Interinstitutional Relations and Foresight

Mr. Wopke Hoekstra
Commissioner for Climate Action

Ms. Adina-Ioana Vălean
Commissioner for Transport

Proposed Monitoring, Reporting and Verification of Aviation Non-CO₂ Emissions

Dear Executive Vice-President Šefčovič,
Dear Commissioner Hoekstra and Commissioner Vălean,

I am writing to express growing concern across the airline community regarding the Commission's plan to introduce a requirement for Monitoring, Reporting and Verification (MRV) for aviation non-CO₂ emissions from 1 January 2025. While it is understood that this action is in response to the revision of EU ETS Directive, adopted by the Council and the EU Parliament in 2023, the methodology proposed by the Commission Services is feared insufficiently mature to measure non-CO₂ emissions accurately, or to help address their mitigation effectively.

Unlike CO₂, which can be calculated with high certainty using the fuel burn emissions factor, the estimation of non-CO₂ effects relies on complex computations of different parameters involving route, weather, and climate information as well as fuel composition. The uncertainties related to all these parameters (some of which airlines do not have access to) mean that it will be extremely difficult to assess the occurrence and climate impact of non-CO₂ emissions from individual flights. The accuracy of results from the proposed MRV system will be limited and is unlikely to support any reduction in non-CO₂ emissions. Any action based on the system proposed could inadvertently drive behavioral change and lead to an increase in CO₂ emissions in response to erroneous non-CO₂ measurements. The proposal risks creating a regulatory burden that will require airlines to provide large amounts of data for all flights, with an insufficient potential for positive environmental impact.

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Airlines have committed to achieving net zero carbon emissions by 2050 and addressing the climate impact of non-CO₂ emissions is no less a priority for the industry. However, specifically for non-CO₂ emissions, we must work together with research institutions and governments to support advances in science that must underpin a credible MRV system. The attachment provides further details regarding the shortfalls and risks associated with the current proposal. A much-preferred approach would be to initiate the process as an experimental and data-gathering phase in support of evidence-based learning upon which to build an effective MRV for non-CO₂ emissions.

IATA urges the following be addressed without delay and ahead of any further progress of the proposal in the legislative process:

- 1) The participation of airlines should be voluntary because current science and the proposed reporting framework cannot result in accurate MRV. Airlines should be encouraged to participate in data collection in support of improved estimation of non-CO₂ effects, based on their ability to provide such data regarding the parameters requested.
- 2) The scope of the MRV must be intra-EU only, to maintain consistency with the ETS scope for aviation. Any intention of expanding the scope to extra-EU international flights would raise legal concerns regarding extraterritorial effects.
- 3) A roadmap for clear scientific validation of any monitoring and reporting of non-CO₂ effects should be developed, with the purpose to explore possible pathways to effective mitigation options, which will reduce the overall climate impact (considering both CO₂ and non-CO₂) from aviation emissions.
- 4) Airlines, scientific partners, and academia should be encouraged to expand trials and studies of non-CO₂ emissions. The Commission's support in these initiatives would be important, including access to funding for the installation of humidity sensors on a sample population of aircraft, without which the accurate prediction of contrail-prone regions cannot be achieved.

We would be grateful for a discussion of these important topics at the earliest opportunity with an aim to ensure a progressive solution for addressing non-CO₂ climate impacts in the European airspace.

Yours sincerely,



Willie Walsh
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International Air Transport Association