

**Dated 3<sup>rd</sup> May:**

Dear Directors-General,

We write in relation to the recent EU's Monitoring, Reporting, and Verification (MRV) for non-CO2 emissions, which has been the subject of political discussion and media commentary.

We understand a part of the air transport industry is attempting to restrict the scope of the monitoring of non-CO2 effects to intra-EU flights only. We want to emphasise that this is not supported by many of Europe's largest airlines. We do not understand the intent of this effort to undermine the MRV scheme and why significant parts of the industry do not want to further the understanding of the science of non-CO2 effects.

The purpose of the MRV scheme is to support the development of a robust scientific evidence base. There is currently simply too much uncertainty around non-CO2 effects to drive policy development or to even reach a coherent understanding of the impact of non-CO2 on warming. This is precisely why we need such a system and why it must not be limited to intra-EU flights.

Broader research on non-CO2 suggests that flights outside the EU create significant contrails (e.g. over the Atlantic) and that these could have an important warming effect. The efforts by IATA to narrow the scope are particularly surprising as IATA itself has said it wants to understand the effects of non-CO2 and that the Atlantic area could be particularly subject to contrail formation<sup>1</sup>.

If the EU excludes these flights from the MRV it will be choosing not to understand the science around non-CO2. We do not think this is a tenable approach.

Intercontinental flights are 6% of the flights yet generate 52% of the carbon emissions and any credible EU policy cannot allow that their non-CO2 impact, which is likely even larger due to the location and timing of these flights, remains unmeasured.

This is not just about the risks to the development of robust science, it is also about how we may address non-CO2 impacts in the future. Without robust science, it will not be possible to develop a policy measure to address non-CO2 effects, so if the EU chooses to restrict the MRV it is by default choosing to remove the option of a future policy instrument. However, we do believe there are reasonable concerns around the scale of MRV data required from airlines and how third country airlines are involved in the MRV. We think these can be resolved through a pragmatic approach to the implementation of the MRV.

Other concerns can be addressed – for example, concerns around presenting false conclusions about aviation's non-CO2 impact could be addressed by presenting these figures as estimates, requiring no action until they are better understood, and concerns around the cost of creating a monitoring system could be addressed by compensating these costs with EU funding. None of the points raised by those asking to limit the MRV to intra-EU flights require an intra-EU scope-restriction as the solution.

The concern that foreign governments and their carriers might in future object to having to report non-CO2 emissions is also not a reason to restrict the measure to intra-EU flights. These carriers are

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<sup>1</sup> "One study estimates that about 0.06% of the sky area is covered by contrail cirrus globally, although in some high-traffic regions like the North Atlantic it could be up to 10%", page 7 of report '[Aviation contrails and their climate effect, tackling uncertainties and enabling solutions](#)', 30 April 2024, IATA

already subject to reporting requirements under CORSIA and will be subject to reporting requirements under ReFuelEU Aviation.

There is no technical reason why extra-EU flights should be exempted from reporting their non-CO2 emissions.

Clearly the simplest and most effective approach for the EU would be to monitor a sample of flights to reduce the regulatory burden on airlines, while ensuring the sample is non-discriminatory and covers a representative share of short and long-haul intra- and extra-EU, day and night routes. A sample is all that should be needed to deliver a scientifically robust outcome.

Options to tackle non-EU country objections, should they arise, could involve limiting or delaying the enforcement for non-EU carriers, or other options involving EU funding to address any imbalance in costs. The scope restriction to intra-EU flights is not a necessary outcome.

We urge the Commission services to come together and come up with creative solutions to tackle any legitimate concerns with non-EU countries, as they did with ReFuelEU Aviation, while preserving the original intention of the law, which was to include all of European aviation both short and long-haul in the MRV.

We cannot have a repeat of the 2013 'Stop the Clock' decision, where the scope of the Emissions Trading System was limited to intra-EU aviation. This created a situation where CO2 emissions data was reported on intra-EU routes, while extra-EU routes were exempt, despite creating 70% of European aviation's emissions.

The way to ensure the MRV is not similarly deprived of data, and is able to generate good science, is to find creative ways to include long-haul in this monitoring system on a mandatory basis from the start, as EU law stipulates, while minimising the chances of objections from non-EU countries.

Yours sincerely,

easyJet, Ryanair and Wizz Air.

