



IM InfluenceMap

Airlines and European Climate Policy

How European Legacy Airlines are Leading Opposition to European Climate Policy

July 2022



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Executive Summary

- This report finds that European airlines remain leading opponents of European climate legislation. The analysis updates InfluenceMap’s 2021 ‘*The Aviation Industry and European Climate Policy*’ report, focusing on corporate climate policy advocacy since June 2021. This report identifies a growing divide between legacy airlines like Air-France KLM, International Airlines Group (IAG), and Lufthansa, leading negative advocacy on European climate regulation, and low-cost airlines - easyJet, Ryanair and Wizz Air - increasingly supportive of applying climate policy to all international flights in the EU.
- The analysis draws upon an assessment of over 350 items of evidence of climate policy engagement by the aviation sector since June 2021. This includes previously unseen data obtained by freedom of information (FOI) requests by InfluenceMap to the UK government and EU Commission. Each item of evidence is assessed against Paris-aligned government and science-based benchmarks. The analysis highlights the risk posed to Paris-aligned policy from negative corporate policy engagement in the light of key EU Parliamentary and Council decisions on climate policies proposed under the EU’s ‘Fit for 55 package’ during the summer of 2022.
- Despite improvements in the aviation sector’s climate-related engagement since June 2021, it remains one of the strongest opponents of European climate policy. Negative engagement appears to be led (with climate policy engagement scores on an A to F scale) by legacy airlines (*Air France-KLM* (D), *International Airlines Group (IAG)* (D), and *Lufthansa* (D-)) and the industry associations *Airlines for Europe (A4E)* (D) and *International Air Transport Association (IATA)* (D-).
- Legacy airlines are found to communicate top-line support for net-zero 2050 ambitions while appearing to oppose key policies to reach this target, particularly efforts to regulate international flights. New documents obtained by FOI request reveal that in a January 2022 email to an EU Commission official, IAG *advocated* for the EU’s sustainable aviation fuels (SAF) mandate to be limited to intra-EU flights (EU to/from EU), while *Air France-KLM stated* they “are not supporting the introduction of a kerosene tax” in an October 2021 email to the EU Commission. Lufthansa’s CEO, Carsten Spohr, and Air France-KLM’s CEO Ben Smith, also endorsed the January 2022

CHANGE IN EUROPEAN AVIATION COMPANIES’ AND ASSOCIATIONS’ PERFORMANCE SCORES 2021-22

	INDUSTRY ASSOCIATIONS		LEGACY AIRLINES			LOW-COST AIRLINES			AIRLINE MANUFACTURERS	
										
2021	E+	E+	E+	E+	E+	E	D	D	D	D-
2022	D	D-	D	D-	D	D+	C+	C-	D+	D

Aviation Alliance declaration, which appeared to *support* exempting feeder flights from the EU ETS and *rejected* an EU kerosene tax.

- In contrast, low-cost airlines *easyJet* (C+), *Wizz Air* (C-), and *Ryanair* (D+) appear to have developed positive stances on several policy streams since June 2021, advocating for the inclusion of extra-EEA flights (EEA to/from non-EEA) in the EU emissions trading scheme (ETS) and EU SAF mandate. In June 2022, *easyJet* and *Ryanair* commissioned a report which highlighted that limiting EU climate measures to intra-EEA flights would “jeopardize 73 percent of emissions savings”. In a June 2022 press release, Ryanair CEO, Michael O’Leary, *called* on EU Member States and Commissioner Frans Timmermans to support the EU Parliament’s plenary vote to extend the EU ETS to flights departing the EEA. InfluenceMap’s analysis also finds that *Airbus* (D+) and *Boeing* (D) appear to be less engaged on EU climate policies since June 2021.
- Airlines industry association, Airlines for Europe appears to have *led advocacy* to push for additional EU ETS allowances based on the

amount of SAF used by airlines. Documents accessed via an FOI request show that in a June 2021 private meeting with the EU Commission, A4E appeared to *advocate for* free EU ETS emissions allowances to be “gradually reduced”, and the implementation of the global CORSIA offsetting scheme “with minimum deviation” suggesting support for a hybrid EU ETS-CORSIA system, alongside appearing to *advocate* against an EU kerosene tax.

- The European aviation sector appears to be united in opposition to national ticket taxes and demand management policies. New documents, uncovered by FOI requests, reveal opposition from *Ryanair*, *IATA*, *easyJet*, *IAG*, *Wizz Air*, *Virgin Atlantic*, and *American Airlines* to the UK’s Air Passenger Duty in June 2021 consultation responses, while *Ryanair*, *American Airlines*, and *IAG* opposed a frequent flyer levy. The wider European aviation industry also appears to have commissioned a *March 2022 study* emphasizing the environmental costs and “limited” CO₂ reductions in a shift from air to rail, appearing critical of policies such as flight bans.

- The aviation sector is found to enjoy a high level of political access in Europe, with an assessment of EU transparency data uncovering 43 meetings between the aviation industry and key climate-focused Members of the European Parliament in the run-up to crucial May/June 2022 EU parliamentary votes.
- The study also details the PR strategies employed by airlines to give the impression that the sector is engaged in positive climate action and deflect responsibility for addressing emissions onto the consumers. *KLM* and *easyJet* have both been accused by regulators of misleading consumers through advertising carbon-neutral flying. March 2022 speeches from the CEOs of *Lufthansa* and *Ryanair* also appeared to leverage Russia’s invasion of Ukraine to push back against EU climate policies. This report also reveals multiple, significant gaps between the aviation industry’s strategic communications and the conclusions from the *IPCC’s Working Group III report*, particularly on international climate policy, the need for demand management policies, and a modal shift from aviation to rail.

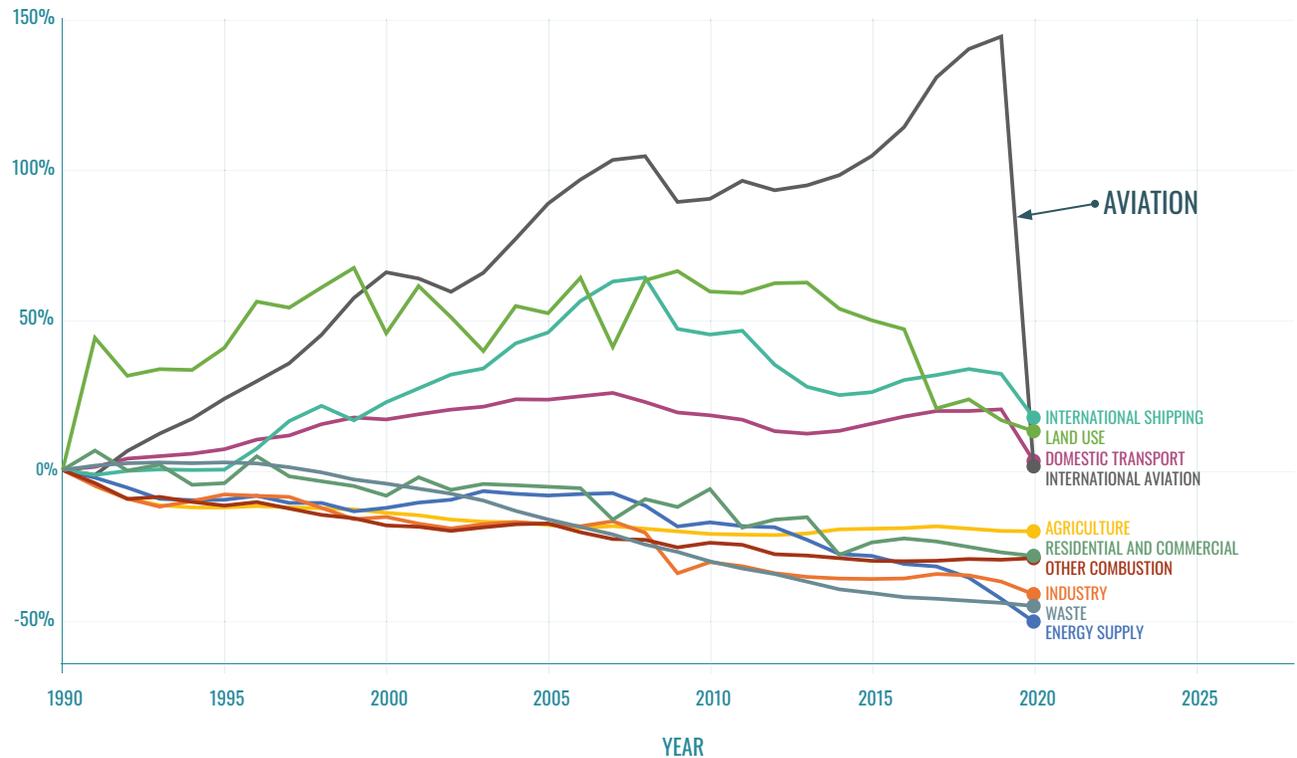
European Aviation and Climate Change

Aviation's Climate Impacts

Aviation remains one of the most-carbon intensive forms of transport, with EU international aviation sector emissions *more than doubling* from 1990 to 2019. This growth is primarily due to *significant increases* in air travel, with flying amongst the least carbon-efficient forms of passenger transport per kilometer in Europe, producing over four times the emissions of an equivalent journey by train, according to a March 2021 *European Environment Agency (EEA) study*. While in 2019, aviation accounted for *3.8% of EU GHG emissions*, the COVID-19 pandemic led to a significant decline in such emissions from 2019-2020 (see graph).

Eurocontrol predicts air traffic will return to its 2019 flight peak *as early as 2024* and continue to grow, leading to an increase in annual European flights of *44% by 2050*. Consequently, as other European sectors rapidly decarbonize, aviation's growth is projected to take an increasingly large share of Europe's carbon budget, threatening the Paris Agreement's temperature goals.

Change in European (EU27 + UK) GHG Emissions by Sector 1990-2020 (source: *EEA*)



The majority of aviation's climate emissions in Europe remain largely unaccounted for under EU regulation. Long-haul journeys represented only 6% of all EU flights in 2020, yet they also created *52%* of European aviation's CO₂ emissions, due to the *greater quantity* of fuel burned. However key EU climate regulations do not currently regulate these emissions from long-haul flights. Additionally, EU regulation does not yet account for aviation's non-CO₂ impacts, representing *over two-thirds* of aviation's warming effect, according to a European Union Aviation Safety Agency (EASA) study.

The IPCC on 1.5°C and Aviation

In April 2022, the Intergovernmental Panel on Climate Change (IPCC) released the third part of its [Sixth Assessment Report](#), outlining the necessary emission reductions to meet global climate targets. For aviation, the full report's key findings include:

- **Aviation emissions:** Between 2010-18, global emissions from aviation increased at a rate of 4%/year (IPCC AR6, 10-58, 19), accounting for 2.4% of global GHG emissions in 2018 (IPCC AR6, 10-58, 20-21). While international aviation generates 65% of aviation's CO₂ emissions (IPCC AR6, 10-58, 16), growth in aviation emissions is projected to continue as global income rises (IPCC AR6, 10-16, 27-32).
- **Demand management and modal shifts:** “Fundamental shifts in technology, fuel types or changes of behavior or demand” are needed to reach net-zero CO₂ emissions and restrict warming to 1.5°C. (IPCC AR6, 10-59, 8-12). Regarding aviation, consumers appear to be responsive to cost, therefore strategies that increase flight costs are likely to reduce demand (IPCC AR6, 10-16, 44-45). The introduction of high-speed rail services, alongside demand management strategies (such as flight bans, increased taxes and duties, frequent flyer levies, and marketing regulations) may induce shifts to alternative transport modes, increasing the mitigation of aviation's emissions (IPCC AR6, 10-64, 10-30). Improvements in energy efficiency are unlikely to compensate for the projected growth in flights (IPCC AR6, 10-60, 4-6).
- **Non-CO₂ effects:** The warming effect from non-CO₂ effects remains uncertain but is estimated to contribute 66% of aviation's climate impact (IPCC AR6, 10-59, 23-24). The avoidance of contrails through altering flight trajectories may mitigate non-CO₂ impacts (IPCC AR6, 10-62, 34-39).
- **Sustainable aviation fuels (SAFs):** SAFs could offer emissions reductions but are limited by availability and cost. Increased research, large capital investments (IPCC AR6, 10-28, 11-29), adjustments to the price of fossil fuels, and supportive policies are required (IPCC AR6, 10-61, 10-15). Hydrogen, hydrogen fuel cells, and synthetic fuels (produced from low-carbon hydrogen or with CCS) will likely have a future role within aviation. However, strong policies are needed (IPCC AR6, 10-60, 29-34). Various pathways have been discussed for the production of non-bio SAFs such as power-to-liquid pathways sometimes termed ‘electro-fuels’ [...] These synthetic fuels have potential for large life cycle emission reductions [...] Low carbon energy supply, scalable technology, and therefore costs represent barriers. However, the current cost estimates of such fuels are approximately 4 to 6 times the price of fossil kerosene (IPCC AR6, 10-61, 20-33).
- **ICAO governance:** Changes to international accountability and governance structures, such as the International Civil Aviation Organization (ICAO), are likely to be needed to support the decarbonization of aviation (IPCC AR6, 10-67, 10-28).
- **CORSIA:** ICAO's Carbon Offset and Reduction Scheme for International Aviation (CORSIA) primarily relies on offsetting aviation's CO₂ emissions. Consequently, “by its nature, CORSIA does not lead to a reduction in in-sector emissions from aviation”, particularly as most approved offsets are ‘avoided emissions’ rather than using fuels with reduced life-cycle emissions, as these fuels are more expensive. Therefore “at its best” CORSIA should be transitional to enable aviation to reduce emissions substantially later (IPCC AR6, 10-63, 14-26).

European Climate Regulation for the Aviation Sector

On July 14th, 2021, the EU Commission presented the 'Fit for 55' package, intended to align EU policy with a net 55% GHG reduction target by 2030 compared to 1990, proposing numerous measures to decarbonize aviation. These regulations include the first EEA-wide *sustainable aviation fuels (SAFs) mandate*, a kerosene fuel tax, and increasing the ambition of the EU Emissions Trading System (EU ETS). In 2022, the EU Parliament and Council will each present their position on the EU ETS, SAF mandate, and kerosene tax. The three EU institutions then negotiate the positions via a 'trilogue' to reach a compromise agreement, after which the resulting policy is provisionally agreed upon and submitted for final approval before becoming law.

Regulation	Region	Description of Policy
EU Emissions Trading System (EU ETS)	EU	Since 2012, the EU ETS only applied to intra-EEA flights. The <i>EU Commission's</i> proposal maintained an intra-EEA scope while accelerating the phase-out of free EU ETS allowances to 2027. The <i>draft EU Parliamentary position</i> accelerated the phase-out of free allowances for aviation from 2027 to 2026, increasing the emissions reduction potential of the policy. <i>In June 2022 the EU parliament voted</i> to include all flights departing the EEA, phase-out free emissions allowances by 2025, and allocate SAF-based allowances until 2030.
Jet fuel taxation	EU and national	The EU Commission's proposal for the <i>Revision of the Energy Taxation Directive</i> proposed a phase-in of jet fuel tax over 10 years. The <i>draft EU Parliamentary position</i> supported the taxation of jet fuel and advocated for a permanent zero tax rate on sustainable aviation fuels and electricity. However, <i>some</i> EU member states have historically opposed a jet fuel tax, and removing the tax exemption requires <i>unanimity</i> among member states in the Council.
Ticket taxes	National	In 2019-21, <i>Germany</i> and the <i>Netherlands</i> introduced ticket taxes on flights and in April 2022 the <i>Belgian Embarkation Tax</i> came into effect. In October 2021, the <i>UK Government decreased domestic</i> Air Passenger Duty while increasing rates for flights over 5,500 miles.
SAF mandate	EU	The <i>ReFuelEU Aviation Initiative</i> , proposed by the EU Commission, recommended a gradually increasing SAF mandate with targets of 2% by 2025 and 63% by 2050 for all flights departing the EEA, alongside a sub-obligation of 0.7% e-kerosene from 2030, rising to 28% by 2050. The EU Parliament's <i>draft position</i> maintained the Commission's ambition. In June 2022, the <i>EU Council</i> adopted its general approach which increased the 2030 target for SAFs from 5% to 6%, and proposed the possibility for member states to increase their sub-mandate of synthetic fuels.

The Global CORSIA Offsetting Scheme and Europe

While European governments have sought to introduce more ambitious regional and national climate policies, many in the aviation industry have advocated for the global CORSIA offsetting scheme to be Europe's primary climate regulation for flights. CORSIA was *first agreed upon in 2016* by ICAO, the UN agency responsible for global climate regulation for aviation. The policy remains *voluntary* for all member states until 2027 and *does not account* for non-CO₂ effects, with a pilot phase operating from 2021-23 that represents around three-quarters of international flights, including *all EU member states and the UK*.

CORSIA allows growth in aviation's absolute emissions if airlines purchase offsets or deploy lower-carbon fuels to compensate for aviation's GHG emissions above a 2019 baseline (amended from an average of 2019-20 emissions after intensive advocacy from IATA (see InfluenceMap's 2021 *Aviation Report*)). However, as global aviation CO₂ emissions are unlikely to reach 2019 levels *until 2024*, CORSIA is unlikely to have an effect until then. Although ICAO has not yet finalized a baseline for the next phase, in July 2021 the EU Commission proposed to *strengthen* CORSIA's baseline to 2019-20 emissions from 2024.

In an independent scientific analysis, *Climate Action Tracker* found that CORSIA and ICAO's aviation climate strategy is "*critically insufficient*" in meeting the goals of the Paris Agreement. It describes CORSIA as "highly unlikely to deliver the substantial reductions needed to achieve ICAO's aspiration goal" of post-2020 carbon-neutral growth and estimated that, under current policies, GHG emissions from international aviation will *increase by 190-277% between 2015 and 2050*.

At COP26 in November 2021, many EU member states, including France, Germany, Denmark, Italy, and Spain signed '*The International Aviation Climate Ambition Coalition*', which committed to working through ICAO to "advance ambitious actions to reduce aviation CO₂ emissions at a rate consistent with efforts to limit the global temperature increase to 1.5°C" and *strengthen* ICAO's global CORSIA scheme. The agreement does not support any *binding* emission reductions in the aviation sector.

Methodology

InfluenceMap maintains the world's leading platform tracking and scoring companies and industry associations on their climate policy engagement, a platform that has been operational since 2015. InfluenceMap's analysis informs the global institutional investor community that wishes to gain a full understanding of how corporations are impacting climate change.

This report relies on InfluenceMap's recognized *process for scoring and ranking companies* and industry associations on their activities influencing climate change policy. Listed below are some of its key features and resulting outputs:

- InfluenceMap's system adheres to key features of sound corporate assessment metrics: objectivity, transparency, ease of comprehension, and includes like-for-like comparisons across and within sectors.
 - InfluenceMap's system does not judge climate policy itself but instead measures corporate positions against Paris Agreement-aligned benchmarks of government policy, and Science-Based Policy benchmarks based on IPCC statements.
 - InfluenceMap defines "policy engagement" based on the *UN Guide for Responsible Corporate Engagement in Climate Policy (2013)*, which defines a range of corporate activities as engagement, such as advertising, social media, public relations, and direct contact with regulators and elected officials.
 - InfluenceMap relies on numerous publicly accessible data sources that are reliable representations of corporate policy engagement. These include organizational websites, senior management statements, regulatory consultation comments, financial disclosures, and reports from reliable media outlets.
- Although the system does not require the cooperation of the organizations being assessed, InfluenceMap has engaged with over 100 large corporations, industry associations, and other stakeholders on our methodology and results.
 - InfluenceMap's system is updated continuously as new information becomes available, which is assessed and added to the InfluenceMap.org database. These results are freely available and in the public domain. The results are provided in the form of metrics and analysis on individual organizations, alongside in company tables produced by *Climate Action 100+* (a globally leading investor initiative, which incorporates InfluenceMap's assessments on climate policy engagement, to benchmark the world's largest corporate GHG emitters on their net-zero transition). A company's relationships with industry associations can be viewed on InfluenceMap's company profiles (*Air France-KLM, easyJet, Lufthansa, IAG, Ryanair, Wizz Air*).

To assess which corporations and industry associations are the most influential on climate issues, InfluenceMap's method produces four metrics:

- The **Organization Score** (0-100) expresses how supportive or obstructive the organization is towards climate policy aligned with the Paris Agreement, with 100 being fully supportive and 0 being fully opposed.
- The **Engagement Intensity** (0-100) expresses this activity's intensity, whether positive or negative.
- The **Relationship Score** (0-100) expresses how supportive or obstructive the company's industry associations are towards climate policy aligned with the Paris Agreement, with 0 being fully opposed and 100 being fully supportive (aggregated).
- The **Performance Band** expresses a full measure of a company's climate policy engagement, including both its own and its industry groups' activity on an A+ through to F scale (A = support, F = opposition).

Using this methodology, InfluenceMap's platform assesses over 350 of the largest companies globally, along with over 150 industry associations that represent these companies in climate policy debates. This includes a deep analysis of corporate and industry engagement with EU-level policies, particularly concerning the European Green Deal.

Industry Policy Engagement on EU Climate Policy for Aviation

This study updates InfluenceMap’s 2021 ‘*The Aviation Industry and European Climate Policy*’ report, focusing on the climate-related policy engagement of the European aviation sector since June 2021. It covers airlines that are in the top 10 by *2019 airline passenger numbers* and disclose a lobbying spend of over €0 in the EU transparency register in 2021-22 (see *Appendix 4*). These airlines are *Air France-KLM, easyJet, International Airlines Group (IAG), Lufthansa, Ryanair, and Wizz Air*. The report also covers *Airbus* and *Boeing*, which collectively represent *99%* of the global market share for large commercial airliners. This analysis is based on 350+ pieces of engagement evidence, including data found from 10+ freedom of information requests.

This report further explores these companies’ indirect climate policy engagement through the industry associations *Airlines for Europe (A4E)* and *International Air Transport Association (IATA)*. All analyzed corporations, excluding Wizz Air, are a member of A4E, while Lufthansa, IAG, and Air France-KLM are members of IATA (*Appendix 1*). Full scoring profiles of each entity are available on the InfluenceMap *website*.

In 2021, performance scores averaged E+ and all were D or below. In 2022, low-cost airlines scored an average C-, indicating rapid improvement, with easyJet increasing from D to C+, and Ryanair from E to D+. Yet, despite broad improvements, legacy airlines *Air France-KLM, International Airlines Group,*

and *Lufthansa*, remain industry laggards, averaging D due to their obstructive climate policy engagement (see *Appendix 2*).

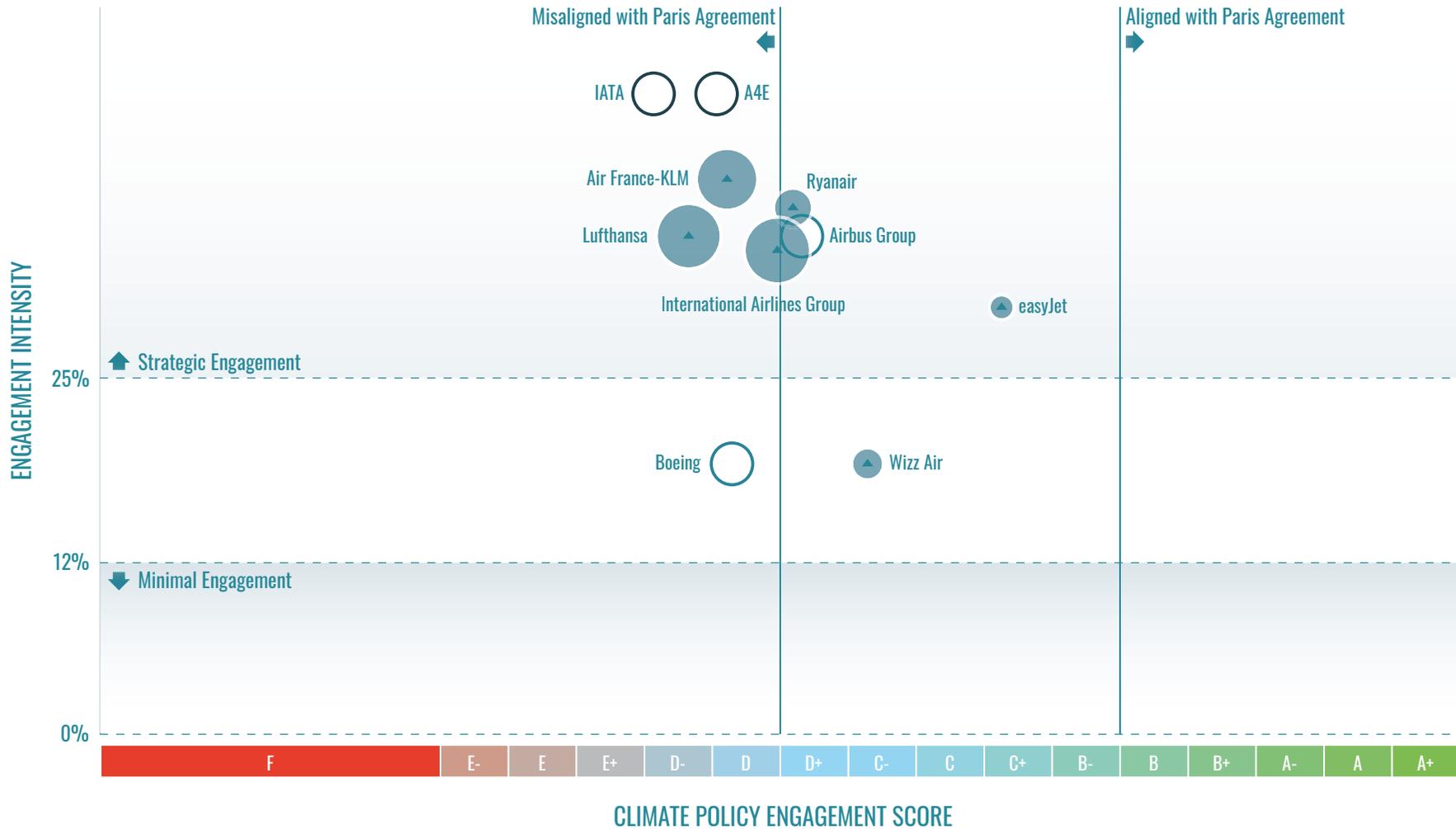
The following quadrant plots contrast climate policy engagement scores within the sector and with every other European entity analyzed for the Climate Action 100+ (CA100+) initiative in the InfluenceMap database. The circle size for each airline represents disclosed GHG emissions from flights in 2019¹, with empty circles for Boeing, Airbus, IATA, and A4E as these entities don’t produce direct GHG emissions from flights. Circles closer to the top-left are actively engaged and opposed to Paris-aligned climate policy, while circles to the top-right are actively supporting Paris-aligned climate policy. Circles closer to the bottom have significantly less direct climate policy engagement. Notably, all analyzed legacy airlines and both industry associations score D or below, indicating misalignment with the Paris Agreement.

¹ The CO₂eq emissions values for Air France-KLM, easyJet, IAG, Lufthansa and Ryanair are based on the companies’ disclosed emissions, sourced from Table 6 of the *Corporate Social Responsibility Observatory’s 2022 report*, commissioned by Greenpeace. For Wizz Air, a yearly CO₂eq emissions value was calculated from 2019 monthly disclosures of CO₂ emissions.

CHANGE IN EUROPEAN AVIATION COMPANIES’ AND ASSOCIATIONS’ PERFORMANCE SCORES 2021-22

	INDUSTRY ASSOCIATIONS		LEGACY AIRLINES			LOW-COST AIRLINES			AIRLINE MANUFACTURERS	
2021	E+	E+	E+	E+	E+	E	D	D	D	D-
2022	D	D-	D	D-	D	D+	C+	C-	D+	D

Aviation Companies and Associations Compared on Climate Policy Engagement



Detailed Results of InfluenceMap's Analysis

InfluenceMap's *2021 analysis* of the European aviation sector's climate engagement identified near sector-wide opposition to kerosene taxes, ticket taxes, and extending the EU ETS to all international flights, alongside more mixed engagement on an EU SAF mandate. In contrast, this report highlights a significant split emerging between legacy and low-cost airlines, with low-cost airlines appearing increasingly supportive of extending climate regulations to all international flights, while legacy airlines appear to remain opposed.

This report also notes that despite broad sector-wide improvement in the aviation sector's climate policy engagement since June 2021, the aviation industry appears to remain a key opponent of ambitious European climate policy. A full table detailing company-level and industry association engagement on European climate policy for aviation can be found in [Appendix 2](#), with full company policy scorecards available in [Appendix 3](#).

InfluenceMap found limited evidence of European climate policy engagement for *Boeing* and *Airbus* since June 2021. Both manufacturers *signed* the Clean Skies for Tomorrow report in July 2021, indicating *support* for an EU SAF mandate, while Airbus appeared to support a more ambitious SAF mandate during a *private meeting* with DG MOVE in September 2021, obtained by an InfluenceMap FOI request. However, a July 2021 Financial Times article also reported that Airbus' CEO "completely disagree(s)" with an *EU kerosene tax*.

A large, grey, stylized opening quotation mark.

This report highlights a significant split emerging between legacy and low-cost airlines, with low-cost airlines appearing increasingly supportive of extending climate regulations to all international flights, while legacy airlines appear to remain opposed.

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The Lobbying of Legacy vs Low-cost Airlines

Regulation	Legacy Airlines' Position	Low-cost Airlines' Position
EU Emissions Trading System (EU ETS)	<p>Position: Oppose the inclusion of extra-EEA (all international) flights in the EU ETS.</p> <p>Example(s): In a January 2022 position paper, Air France-KLM <i>stated</i> “we are against the expansion of the EU ETS geographical scope”. A February 2022 IAG <i>position paper</i> appeared to advocate for CORSIA to be fully implemented on intra-European flights and continued free emissions allowances.</p>	<p>Position: Support expanding EU ETS to all international flights.</p> <p>Example(s): In June 2022, <i>easyJet</i> and <i>Ryanair</i> commissioned a study highlighting potential emissions reductions from the inclusion of extra-EEA flights while, Ryanair CEO, Michael O’Leary further <i>called on</i> EU Member states to support the Parliamentary vote to extend the EU ETS to flights departing the EEA in a June 2022 press release.</p>
Kerosene-based jet fuel taxation	<p>Position: Oppose an EU-wide kerosene tax.</p> <p>Example(s): An October 2021 email to DG MOVE from Air France-KLM, acquired by InfluenceMap via FOI, <i>stated</i> we “are not supporting the introduction of a kerosene tax which does not help to make our sector more sustainable”. Lufthansa’s <i>2021 Annual Report</i>, and a February 2022 <i>position paper</i> by IAG, also appeared to oppose an EU jet fuel tax.</p>	<p>Position: General opposition to an EU kerosene tax while supporting its extension to all international flights with significant exceptions.</p> <p>Example(s): A November 2021 consultation response by Ryanair <i>directly lobbied</i> policymakers to oppose an EU kerosene tax. However, at the November 2021 Eurocontrol summit, <i>easyJet CEO</i>, Johan Lundgren, and <i>Ryanair CEO</i>, Michael O’Leary appeared to support an EU jet fuel tax if it replaced other taxes. Wizz Air’s 2021 CDP response also <i>stated</i> it supports “a full scope kerosene tax or no tax”.</p>
Ticket taxes	<p>Position: Oppose national ticket taxes.</p> <p>Example: A March 2022 Reuters report stated that Brussels Airlines CEO, a Lufthansa subsidiary, <i>called</i> the Belgian ticket tax “a disappointing development”.</p>	<p>Position: Oppose national ticket taxes.</p> <p>Example: Ryanair’s FY21 results, published in July 2021, <i>stated</i> “Ryanair is fundamentally opposed to the introduction of additional aviation taxes, including new environmental taxes, fuel taxes or emissions levies”.</p>
Sustainable aviation fuels mandate	<p>Position: Lobby for exemptions for extra-EEA flights.</p> <p>Example: In a January 2022 email to the EU Commission, obtained by an InfluenceMap FOI request, IAG <i>advocated</i> to policymakers to “reduce the SAF mandate to intra-EU scope” while appearing to support a slower phase-in of the mandate. Yet, IAG also <i>supported</i> a 6% 2030 SAF mandate, as proposed by the EU Council, according to a June 2022 media report.</p>	<p>Position: Support the inclusion of all international flights in an EU SAF mandate.</p> <p>Example: In February 2022, <i>Ryanair</i>, <i>Wizz Air</i>, and <i>easyJet</i> signed a joint letter urging policymakers to “resist pressure to exclude long-haul networks” from an EU SAF mandate.</p>
<p>Joint Position: A February 2022 joint statement, signed by <i>Air France</i>, <i>KLM</i>, <i>easyJet</i>, and <i>Ryanair</i> advocated for increased ambition on the “scale and timing of e-kerosene deployment”.</p>		

Aviation Industry Association Climate Policy Engagement

- Industry associations have mostly negative climate policy positioning. During a June 2021 private meeting between A4E CEOs and DG MOVE, obtained by InfluenceMap via FOI, A4E *directly advocated* against an EU kerosene tax and appeared to *support* a slower reduction in free EU ETS emission allowances and the implementation of CORSIA with "minimum deviation", suggesting support for a hybrid EU ETS-CORSIA system. May 2022 IATA blog posts also appeared to advocate regulating EU aviation emissions through CORSIA over the more stringent EU ETS, *including* for intra-EEA flights, alongside *describing* an EU kerosene tax as "greenwash". However more positively, in a June 2022 press release A4E appeared to *support* a 5% 2030 SAF-blending target as proposed by the EU Commission, while advocating against a 6% 2030 mandate target proposed by the EU Council due to concerns around sustainable feedstock availability.

Industry associations and June 2022 EU ETS parliamentary votes

In June 2022, the EU Parliament *voted* to include all flights departing the EEA, phase-out free emissions allowances by 2025, include non-CO₂ impacts, and introduce 'SAF allowances' until 2030 (with a possible extension until the end of 2034), with 70% of SAF allowances to be allocated to synthetic fuels of non-biological origin. The introduction of SAF allowances appears to be in line with the advocacy of A4E position papers in *March* and *January 2022*, which advocated for the phase-out of free emissions allowances to be delayed until 2030 and subsequently allocated to aircraft using SAFs. Furthermore, ahead of the May 2022 ENVI Committee vote, *a joint policy proposal* from aviation industry associations advocated for SAF allowances.

However, a June 2022 response from A4E to the same EU parliamentary votes appeared *unsupportive* of other elements of the EU Parliament's proposal, including extending the EU ETS to all international flights departing the EEA and the proposed phase-out of free emission allowances by 2025. In its response, A4E also appeared to *advocate* delaying the inclusion of non-CO₂ impacts in the EU ETS, arguing that "further scientific and legal analysis is still needed". IATA's CEO, Willie Walsh, also *urged* "the European Council...to strongly reject the expansion of the ETS voted yesterday by Parliament", in a June 2022 press release.

Aviation Industry's Engagement on Demand Management and Modal Shift Policies

The IEA 1.5°C pathway for aviation found that without demand management policies, residual emissions in 2050 may be more than double what is required to limit temperatures to 1.5°C. The Climate Action 100+ initiative's *aviation sector strategy* also recommends investors push for positive engagement around demand management policies to accelerate aviation's net-zero transition. However, in 2021-22, European airlines appear to have consistently opposed demand management policies and a modal shift from aviation to rail, despite the *significantly smaller* emissions of rail per passenger-kilometer.

- **Advocacy against demand management policies:** In a November 2021 COP26 presentation easyJet CEO Johan Lundgren appeared to *argue* that reduced air traffic would increase inequality by limiting “less wealthy” passengers from flying. Likewise, IAG *stressed* that demand management would “deprive people” of economic benefits during March 2022 testimony to a UK Parliamentary Committee. Similarly, A4E *stated*, “the solution is not to fly less, but to fly more efficiently” in 2022 website communications, while A4E's Managing Director, Thomas Reynaert *stressed* that “it is okay to fly, people don't have to...take the train” at the A4E Aviation Summit in March 2022.
- **Emphasizing the drawbacks of rail over aviation:** In 2021-22 the aviation industry appears to have strategically pushed back against a low-carbon modal shift in Europe by emphasizing the climate impacts of rail over aviation. For example, aviation industry associations (including A4E) commissioned a *March 2022 study* that found the benefits of a modal shift to rail “are limited”, while stressing that “aviation decarbonisation will be well underway by the time comparable rail infrastructure is deployed”. A press release about the report, released by *Airports Council Europe (ACE)*, *Civil Air Navigation Services Organization (CANSO)*, and *European Regions Airline Association* emphasized the need for “factual accuracy in the debate around the intramodality of sustainable transport”, appearing to push back against proposed flight bans in Europe. Similarly, in a February 2022 Guardian interview, EasyJet CEO, Johan Lundgren, *asserted* that “massive investment in rail infrastructure would mean you would take the carbon hit now - these things have huge carbon emissions”, while Ryanair's 2021 Annual Report *argued* that short-haul flight bans replace “environmentally efficient flights with higher CO₂ emitting ground transportation”.

Airline Engagement on the UK Air Passenger Duty

New documents, uncovered by an InfluenceMap freedom of information request, reveal airlines' active opposition to the UK's domestic Air Passenger Duty (APD) and a proposed frequent flyer levy.

The APD, a ticket tax on flights, is the UK's primary climate policy for aviation. InfluenceMap obtained responses from Wizz Air, Ryanair, easyJet, American Airlines, Virgin Airlines, International Airlines Group (IAG), and the International Air Transport Association (IATA) to the UK June 2021 APD consultation.

In the consultation responses, *Ryanair*, *IATA*, *easyJet*, *IAG*, and *American Airlines* appeared to advocate for a reduction in domestic APD, weakening the climate policy. To compensate for reduced domestic APD, increased international rates were considered by the UK Government, however, American Airlines, Virgin Atlantic, IAG, and IATA opposed the proposal, with Virgin Atlantic *stating* long-haul APD would “significantly undermine the UK’s global connectivity”. *American Airlines*, *IATA*, and *Ryanair* appeared to advocate to abolish the APD completely. In contrast, easyJet, while supporting the reduction in domestic APD, *supported* introducing more international APD bands, and alongside *Wizz Air* appeared to *support* replacing the APD with a carbon tax instead.

Ryanair, *American Airlines*, and *IAG's* responses also appeared to oppose a frequent flyer levy. Ryanair *argued* the levy penalizes passengers that “have an ongoing practical requirement to fly frequently” while American Airlines appeared to *assert* that it is unnecessary as frequent flyers pay more through APD.

Meetings between Airline Lobbyists and EU Members of Parliament (MEPs)

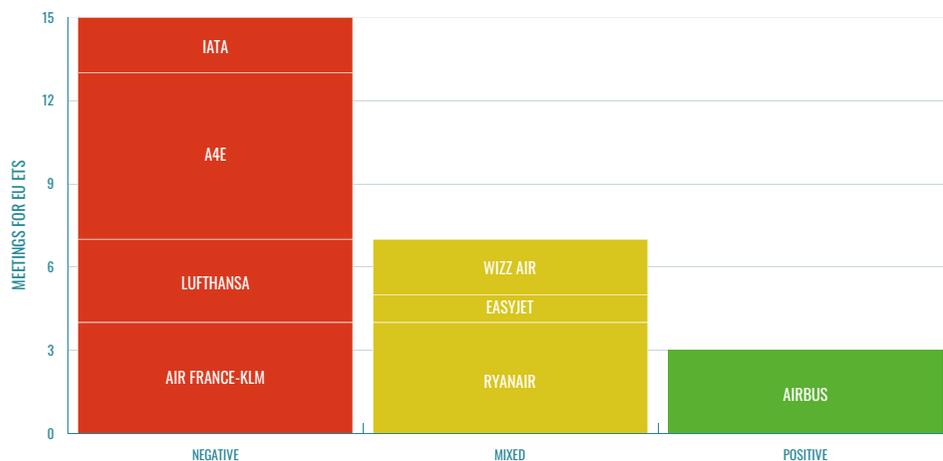
Corporate lobbyists often attempt to influence EU policy when a proposal is amended and voted on by the EU Parliament. While Members of the European Parliament (MEPs) *disclose* meetings with interested parties, the contents of meetings are not publicly disclosed. Since the Fit for 55 package proposal in July 2021, the aviation industry has frequently met with Rapporteurs (MEPs responsible for drafting Parliamentary Committee’s legislative proposals) to discuss files concerning aviation.

InfluenceMap analysis finds that since July 2021, airlines have held a total of 25 meetings with MEPs leading the EU ETS file and 18 meetings with MEPs leading the ReFuelEU Aviation file (EU SAF mandate), while Lufthansa appears to have held the only meeting on the EU kerosene tax.

- **EU ETS:** Four legacy airlines and industry associations with mostly negative engagement on the EU ETS, including supporting continued free emissions allowances (including SAF allowances) (See [Appendix 3](#)), appear to have held the most meetings with Rapporteurs. Only 40% of meetings occurred with the 3 low-cost airlines and Airbus with more mixed EU ETS positions. A4E further *attended* a “closed-door dinner event” with MEPs on the 6th of June, the day before the Parliamentary plenary vote on the EU ETS.

- **ReFuelEU:** 44% of meetings with Rapporteurs on the ReFuelEU file appear to have been with the 3 low-cost airlines with more positive positioning, that have advocated to apply a SAF mandate to all international flights (See [Appendix 3](#)). This compares to 56% of meetings that occurred between 4 legacy airlines and industry associations (and Airbus), which have mixed or negative engagement on the SAF mandate, such as IAG appearing to advocate for it to be limited to intra-EEA flights in 2021-22.

AVIATION COMPANIES AND ASSOCIATION'S MEETINGS WITH EU ETS MEPS



AVIATION COMPANIES AND ASSOCIATION'S MEETINGS WITH REFUELEU AVIATION MEPS



The IPCC's AR6 WGIII Report Versus Aviation Industry Communications

Numerous documents reveal the gap between the *IPCC's Working Group III report's* findings and the European aviation industry's strategic communications. The following table compares IPCC's recommendations on aviation with examples of the aviation industry's climate communications. However, such statements are not necessarily indicative of the entire aviation industry's position.

Issue	IPCC AR6 WGIII key findings	Strategic communications from the airline industry
CORSIA	<p>“CORSIA does not lead to a reduction in in-sector emissions from aviation”, as most approved offsets are ‘avoided emissions’ rather than fuels with reduced life-cycle emissions. Therefore, “at its best” CORSIA should be transitional to enable the aviation sector to reduce emissions substantially later (IPCC AR6, 10-63, 14-26)</p>	<p>“EU policy must be moulded so that it is complementary to global policy. CORSIA made aviation the first industry to adopt a global carbon pricing system for tackling its carbon emissions, and the success of this scheme is crucial to global efforts aiming to decarbonise aviation. [...] Just as the EU ETS began modestly and faced criticism, CORSIA can be adjusted over time to drive robust but cost-effective decarbonisation of aviation at the global level.” - <i>IAG</i>, Position Paper, February 2022</p>
SAFs, synthetic fuels, and SAF mandates	<p>Hydrogen, hydrogen fuel cells, and synthetic fuels (produced from low-carbon hydrogen or with CCS) will likely have a future role within aviation. However, strong policies are needed (IPCC AR6, 10-60, 29-34). Various pathways have been discussed for the production of non-bio SAFs such as power-to-liquid pathways sometimes termed ‘electro-fuels’ [...] These synthetic fuels have potential for large life cycle emission reductions [...] Low carbon energy supply, scalable technology, and therefore costs represent barriers. (Scheelhaase et al. 2019) review current estimates of costs, which are estimated to be approximately 4 to 6 times the price of fossil kerosene. (IPCC AR6, 10-61, 20-33).</p>	<p>“A sub-mandate on Synthetic fuels (PtL) should be eliminated until more reliable information exists to forecast the competitiveness of synthetic fuel. [...] Applying a sub mandate to a SAF option known to be the most complex and expensive is akin to a tax and is simply designed to constrain demand.” - <i>IATA</i>, ReFuelEU legislative amendments proposal, January 2022</p>
Demand management	<p>Consumers appear to be responsive to the cost of flying, therefore strategies that increase flight costs are likely to reduce demand and aviation's GHG emissions (IPCC AR6, 10-16, 44-45).</p>	<p>“The focus should be on how you decarbonise the industry; the question should not be if you should stop flying. [...] Because of the millions and millions and millions of people who benefit – economies that benefit, that have an impact in real people's life. [...] I get extraordinarily upset when people are intellectually lazy, and say we should just stop flying.” - <i>easyJet CEO</i>, Johan Lundgren, The Guardian, February 2022</p>

<p>Modal shift</p>	<p>Emissions assessments for high-speed rail ignore non-CO₂ effects and likely result in an under-representation of the benefits of HSR replacing flights. The commencement of HSR has the potential to provide, particularly in the short to medium-term, additional mitigation of aviation emissions (IPCC AR6, 10-64, 8-30).</p>	<p>“Building new railway lines has a high environmental cost due to the CO₂ emissions associated with cement and steel production, and emissions from the fuel used for construction of infrastructure. [...] Importantly, aviation decarbonisation will be well underway by the time comparable rail infrastructure is deployed. [...] Aviation associations call for greater balance and factual accuracy in the debate around the intermodality of sustainable transport.”- ACI, CANSO, ERAA, press release on a report commissioned by the aviation industry, March 2022</p>
<p>Increased taxes</p>	<p>The introduction of high-speed rail services, alongside air travel demand management strategies (such as flight bans, increased taxes and duties, frequent flyer levies, and marketing regulations) may induce shifts to alternative transport modes, increasing the mitigation of aviation's emissions (IPPC AR6, 10-64, 10-30)</p>	<p>“Taxing airlines removes the positive benefits of aviation but does nothing to encourage carbon efficiency or drive low carbon investment. Instead, it will deprive the sector of resources, making flights more costly which in the end will mean that only the rich will be able to afford to fly” - IAG, Response to UK Public Consultation, June 2021</p>

Key Influencing Tactics Employed by Europe's Aviation Sector

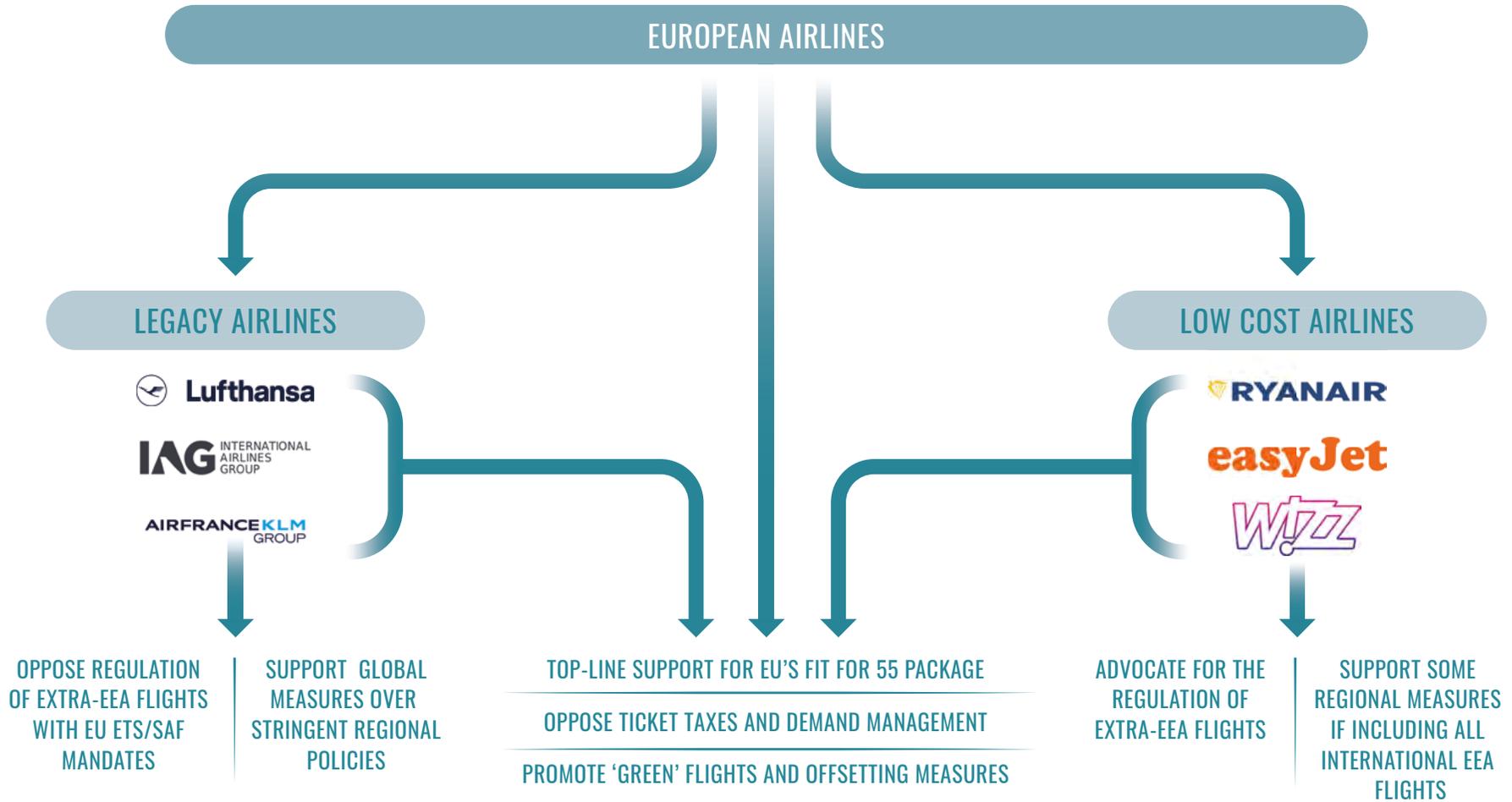
This chapter outlines the key tactics, narratives, and PR strategies employed by the European aviation sector on climate since InfluenceMap's June 2021 *'The Aviation Industry and European Climate Policy'* report to oppose Paris-aligned climate policy.

The Aviation Industry's Climate Policy Engagement

InfluenceMap's 2021 analysis of *European airlines' climate policy engagement* identified an industry strategy to support long-term net-zero targets while opposing Paris-aligned near-term policy measures to achieve them. Legacy airlines appear to have continued to embrace this tactic, strategically leveraging support for global regulations (while increasingly appearing to support more ambitious global action) to oppose more ambitious regional regulations targeting in-sector emissions reductions.

- **Top-line support for the EU's Green Deal:** In 2021-22, all analyzed entities, except Wizz Air, appear to have explicitly stated support for the EU's Green Deal or a net-zero EU or global aviation sector by 2050. *Boeing*, *Airbus*, and *IAG* supported a zero-emissions European aviation sector by 2050 through their endorsement of the July 2021 *'Clean Skies for Tomorrow'* insight report. A4E 2022 website communications *stated* commitment to making "Europe the world's first CO₂ neutral continent by 2050" while *Lufthansa* and *easyJet's* 2021 Annual Reports stated support for the EU's Green Deal. Similarly, Air France-KLM's 2021 *Universal Registration Document*, and Ryanair's Summer 2022 *in-flight magazine*, express support for a 2050 carbon-neutrality goal. IATA also *supported* a net-zero global 2050 aviation emissions target at its 2021 AGM. In contrast, Wizz Air's 2021 CDP response appeared *unsupportive* of the EU's Green Deal because it excluded long-haul and cargo flights.
- **Legacy airlines support global regulation over stringent EU policy.** Legacy airlines appear to consistently prioritize the global CORSIA offsetting scheme over stringent EU regulations, with Lufthansa CEO Carsten Spohr *stating* "we really believe European policymakers must embrace and focus on CORSIA more" at the March 2022 A4E Aviation Summit and a February 2022 IAG position paper appearing to *advocate* for the EU to fully implement CORSIA on intra-EU international flights. Yet more positively, A4E Managing Director, Thomas Reynaert, appeared to *advocate* for the adoption of a global aviation policy "matching Europe's ambition" in a February 2022 Flight Global article and a June A4E statement also *advocated* for ICAO to negotiate a global carbon price, while IAG has also stated *support* for a global SAF mandate. However, both *IAG* and *A4E* appeared unsupportive of EU proposals to strengthen CORSIA's baseline in 2022 position papers.

EUROPEAN AIRLINES CLIMATE POLICY STRATEGY EXPLAINED



Public Relations, Branding, and Climate Change

The *IPCC's Sixth Assessment Report* highlights that corporate responsibility for the climate is often deflected to individuals through brand strategies, framing climate change mitigation as a problem of personal choice and consumption to potentially avoid political action (IPCC AR6, 5-84, 29-37). The European aviation industry appears to employ numerous PR strategies and narratives to imply the sector contributes to climate action, while simultaneously opposing Paris-aligned regulations, six of which are detailed here.

- **Russia's invasion of Ukraine:** At the March 2022 A4E Aviation Summit, Ryanair CEO, Michael O'Leary, appeared to highlight oil price inflation to *push for* a delay in the EU's Fit for 55 package, stating "we need no better incentive [to reduce fuel consumption] than oil at 120 dollars a barrel". Additionally, Lufthansa CEO, Carsten Spohr, appeared to *reference* the Ukraine crisis to emphasize the risks of regional climate regulations on connectivity and competitiveness, stressing the importance of maintaining connectivity "that has made Europe such a peaceful place for many decades". Spohr later *stated* "flying is a part of peacekeeping" in an April 2022 A4E podcast.
 - **Advocating for subsidies over binding regulations enforcing emissions reductions:** The European aviation industry has appeared to consistently advocate for subsidies and incentives over binding regulations to reduce GHG emissions. In a March 2022 position paper, A4E advocated for Europe to *adopt* a similar approach to the US which "focused on incentivizing, rather than regulating". IATA *stated* in a July 2021 press release "mandating a gradual transition to SAF is a less efficient policy compared to comprehensive production incentives". Ryanair CEO, Michael O'Leary, appeared to *emphasize* supply issues with SAFs to advocate for subsidies, seeming to describe the cost of SAFs as a "defacto tax" at the November 2021 Eurocontrol Summit.
- According to a July 2021 Financial Times report, Lufthansa opposed an EU SAF mandate and instead *advocated* for "a financing mechanism...to help pay for sustainable fuels".
- **COVID-19:** The aviation industry has also continued to use the COVID-19 pandemic to support weakening European climate policies. In June 2021 testimony to the UK Transport Committee, Ryanair CEO, Michael O'Leary *called for* a suspension of the UK Air Passenger Duty "for a two or three-year period" due to Covid-19. Lufthansa's 2021 annual report, published in March 2022, also *argued* the policies under the Fit for 55 package are "expected to significantly worsen the recovery of Network Airlines based in the EU". Furthermore, Air France-KLM's 2020 sustainability report, published in June 2021, *stressed* the impact of COVID-19 on airlines to urge policies that maintain competitiveness and *opposed* a Dutch ticket tax.
 - **'Green' flights:** Although aviation in Europe is the *most carbon-intensive* form of transport, many airlines are attempting to rebrand flights as low-carbon. In April 2022, the Dutch advertising regulator ruled that KLM was *misleading its customers* by using terms such as 'CO₂-neutral', suggesting passengers could neutralize their flight's emissions by buying compensation. Similarly,

in December 2021, the French advertising regulator found that an easyJet advert promoting zero CO₂ emission flights by 2050 and zero-emission aircraft was *misleading*.

- **Delinking flights from their emissions:** In 2021-22, the aviation industry appears to be attempting to delink produced GHG emissions from the act of flying, which, due to aviation's dependency on liquid fossil fuels and the lack of widely available alternatives, are currently intrinsically linked. This includes Airbus website communications from 2022 *stating* "aviation is not the problem. Emissions are the problem", and British Airways (IAG) senior executive *stating* that "flying isn't a problem; carbon is" in evidence to the UK Transport Committee in 2021.
- **Prioritizing offsets over in-sector GHG emissions reductions:** The European aviation industry appears to strategically embrace offsets to improve its public image, while simultaneously increasing the number of flights it operates each year. For example, offsetting is prominent in easyJet's "*nextGen sustainability*" branding, which states "for every flight we operate, we offset all the carbon emissions from the fuel used" while clarifying that offsetting is not a long-term solution. *Ryanair*, *Wizz Air*, and *Air France-KLM* also appear to deflect responsibility to consumers by offering carbon offsets associated with personal travel through a carbon calculator. In June 2022, *British Airways*, an IAG subsidiary, released a new PR video encouraging passengers to offset their emissions while *Lufthansa* offers offsetting on its "carbon-neutral flying" website. Ryanair's *2050 net-zero target* is also reliant on "offsetting and other

economic measures" for almost a quarter of emissions reductions. Yet, the Climate Action 100+ Initiative's *aviation sector strategy* recommends investors to urge airlines to focus on emissions reductions within the sector, rather than offsets, to meet global climate targets.

Appendices

Appendix 1: Corporate Membership of Aviation Industry Associations

Airline	Airlines for Europe (A4E)	International Air Transport Association (IATA)
<i>Air France-KLM</i>		
<i>International Airlines Group (IAG)</i>		
<i>Lufthansa</i>		
<i>Ryanair</i>		
<i>easyJet</i>		
<i>Wizz Air</i>		
Aircraft Manufacturer		
<i>Airbus</i>		
<i>Boeing</i>		

Table Key

Member of industry association

Not a member of industry association



Appendix 2: Engagement on EU and National Aviation Climate Policy since June 2021

Industry Association	Engagement intensity		Organization score	Performance Band	EU ETS	Kerosene jet fuel taxation	National ticket taxes	Sustainable aviation fuels mandates
<i>Airlines for Europe (A4E)</i>	44%		45%	D				
<i>International Air Transport Association (IATA)</i>	45%		41%	D-				
Airline	Engagement intensity	Relationship score	Organization score	Performance Band	EU ETS	Kerosene jet fuel taxation	National ticket taxes	Sustainable aviation fuels mandates
<i>Air France-KLM</i>	38%	47%	46%	D				
<i>International Airlines Group (IAG)</i>	33%	49%	50%	D				
<i>Lufthansa</i>	34%	42%	44%	D-				
<i>Ryanair</i>	37%	45%	51%	D+				
<i>easyJet</i>	30%	45%	68%	C+				
<i>Wizz Air</i>	18%	N/A	56%	C-				

Aircraft Manufacturer	Engagement intensity	Relationship score	Organization score	Performance band	EU ETS	Kerosene jet fuel taxation	National ticket taxes	Sustainable aviation fuels mandates
<i>Airbus</i>	35%	53%	51%	D+	Green	Red	Grey	Yellow
<i>Boeing</i>	18%	40%	50%	D	Grey	Grey	Grey	Green

Table Key

Negative positioning and engagement

Mixed positioning and engagement

Positive positioning and engagement

Has not disclosed positioning & engagement



Appendix 3: Corporate Climate Policy Engagement on European Policy Since June 2021

EU Emissions Trading System (EU ETS)			
Industry Association	Position	Evidence	No. of Meetings with rapporteurs for EU ETS/CORSIA
<i>Airlines for Europe (A4E)</i>	Negative	Two A4E position papers from March and February 2022 appear to communicate <i>opposition</i> to a stringent EU ETS, <i>advocating</i> for a delayed phase-out of free emissions allowances until 2030, and the allocation of allowances to aircrafts using SAFs, alongside supporting a hybrid CORSIA-EU ETS system for intra-EEA (EEA to/from EEA) flights. A September 2021 fact sheet further appeared to <i>support</i> national and regional policies that “align with and support CORSIA”. An A4E EU consultation response from November 2021 also seemed to <i>support</i> a CORSIA-EU ETS hybrid scheme for intra-EEA flights and appeared to <i>advocate</i> for “retaining free credits past the foreseen date of 2027”. June 2021 meeting notes between A4E CEOs and DG MOVE, accessed by freedom of information request, further suggested <i>support</i> for free emissions allowances to be “gradually reduced”. Additionally, cost, competitiveness, and carbon leakage concerns were <i>emphasized</i> in a July 2021 press release. A4E’s Managing Director further appeared to <i>emphasize</i> cost concerns in a May 2022 Aviation Week article. In a May 2022 joint letter, A4E appeared to <i>propose</i> continued emissions allowances through allocation based on SAF usage, and A4E appeared <i>opposed</i> to a phase-out of free emissions allowances while supporting an integrated CORSIA-EU ETS scheme in a May 2022 fact sheet. A4E further appeared <i>opposed</i> to the ENVI Committee’s proposed extension to flights departing the EEA and a phase-out of free emissions allowances by 2025, according to a May 2022 Politico report. In a June 2022 statement on the EU Parliamentary plenary vote, A4E appeared to <i>echo</i> this opposition, while also opposing the inclusion of non-CO2 impacts and supporting SAF allowances in the EU ETS. However, A4E appears to have consistently stated <i>general support</i> for the EU ETS for aviation, including in a July 2021 statement.	6
<i>International Air Transport Association (IATA)</i>	Negative	In a July 2021 press release, IATA appeared <i>unsupportive</i> of the EU ETS for aviation and stated that “IATA is extremely concerned by the Commission’s proposal that European States would no longer implement CORSIA on all international flights”. Evidence submitted to a UK Parliamentary committee in March 2022, suggested IATA supported the <i>replacement</i> of the EU ETS for aviation by CORSIA. Two blogs published in May 2022 further appeared to <i>advocate</i> for the regulation of European aviation emissions through CORSIA, <i>including</i> intra-EEA flights. A senior IATA executive appeared to <i>oppose</i> the application of the EU ETS for aviation, including for intra-EEA flights at the May 2022 Routes Europe summit. IATA CEO, Willie Walsh, further <i>opposed</i> the application of the EU ETS to flights departing the EEA, as proposed by EU Parliament, stating “now is the time for Europe to support CORSIA” in a June 2022 press release.	2

Airline	Position	Evidence	
Air France-KLM	Negative	In a January 2022 position paper, Air France-KLM <i>stated</i> “we are therefore against any extension of the application of the EU ETS geographical scope” and appeared to advocate for continued free emissions allowances until 2030-2035 or through “free competition allowances” (a compensation mechanism). Similarly, Air France-KLM’s <i>2021 CDP response</i> suggests support for CORSIA over the EU ETS for long-haul flights. The Aviation Alliance declaration, endorsed by Air France-KLM CEO, Ben Smith in January 2022, further appeared to <i>support</i> the exemption of intra-EU feeder flights from the EU ETS to “prevent carbon leakage”. Air France-KLM’s 2021 Universal Registration Document also appeared to <i>oppose</i> an extension of the EU ETS to all international EEA flights.	4
International Airlines Group (IAG)	Negative	A February 2022 IAG <i>position paper</i> appeared to advocate for CORSIA to be fully implemented on intra-European flights and continued free emissions allowances for intra-EEA flights allocated through either: the airline’s SAF usage, the “CORSIA obligation” for flights departing the EEA and landing in the EEA, Switzerland or UK, or as compensation because “the same CO2 would be captured to some extent by both EU ETS and CORSIA”. Another position paper from February 2022 appeared to repeat this position while also <i>stating</i> that “the EU ETS should continue to focus on intra-European flights”. Additionally, IAG’s 2021 CDP response appeared <i>opposed</i> to the inclusion of all international flights in the EU ETS, preferring regulation through CORSIA. Evidence submitted to a UK Parliamentary committee in March 2022, seemed to <i>oppose</i> the inclusion of all international flights (EEA to/from non-EEA) while supporting the EU ETS for intra-EU (EEA to-from EEA) flights.	0
Lufthansa	Negative	Lufthansa’s <i>2021 Annual Report</i> , published in March 2022, appeared to oppose the phase-out of free emissions allowances, arguing that “tightening the ETS severely distorts competition”. The Aviation Alliance declaration, <i>endorsed</i> by Lufthansa CEO, Carsten Spohr, in January 2022, appeared to support the exemption of intra-EU feeder flights from the EU ETS to “prevent carbon leakage”. Similarly, a Twitter post from February 2022 seemed supportive of the exemption of feeder flights and appeared to <i>call for</i> political ideas other than the EU ETS to “secure an international level playing field”. According to a July 2021 Financial Times article, Lufthansa <i>stated</i> the phase-out of free emissions allowances, alongside other climate measures, would “hobble European airlines”. Lufthansa’s <i>2021 CDP response</i> also appeared opposed to the application of the EU ETS to aviation, preferring regulation through CORSIA. Moreover, Lufthansa’s 2021 Sustainability Fact Sheet, published in 2022, appeared to <i>oppose</i> a more stringent EU ETS.	3

<p><i>Ryanair</i></p>	<p>Mixed</p>	<p>In a November 2021 <i>EU consultation response</i>, Ryanair appeared to oppose the application of the EU ETS to aviation, including intra-EEA flights, alongside the phase-out of free emissions allowances by 2027, arguing it may “make flying more expensive, but not greener”. Ryanair’s 2021 financial results, published in July 2021, further <i>stated</i> the EU ETS “is likely to have a negative impact on the European airline industry as it does not sufficiently promote environmentally efficient growth”. However, more positively, Ryanair CEO, Michael O’Leary, appeared to <i>support</i> the expansion of the EU ETS to all international flights at the November 2021 Eurocontrol Summit. Similarly, a February 2022 joint statement signed by Ryanair seemed to <i>support</i> the inclusion of all international flights in the EU ETS. In June 2022, Ryanair <i>commissioned</i> a report which appeared to support an extension to all international flights, concluding that 73% of emissions savings would be jeopardized by limiting EU climate measures to intra-EEA. Furthermore, a June 2022 Politico report stated that Ryanair CEO, Michael O’Leary, had strongly <i>criticized</i> those opposing an extension of the EU ETS to long-haul flights. In a June 2022 press release, O’Leary further supported the inclusion of all international flights, <i>arguing</i> the current scope is “absurd, unfair and inexplicable”.</p>	<p>4</p>
<p><i>easyJet</i></p>	<p>Mixed</p>	<p>At the Eurocontrol Summit in November 2021, easyJet CEO appeared to <i>emphasize</i> cost concerns around the EU ETS. Additionally, easyJet’s 2021 CDP response suggested <i>support</i> for CORSIA to regulate all international flights (EEA to/from non-EEA) if the obligation is equivalent to the ETS, while supporting the EU ETS for intra-EEA (EEA to/from EEA) flights. However, more positively, in its <i>2021 Annual Report</i>, released in December 2021, easyJet advocated for the inclusion of long-haul flights in the EU ETS, stating “all airlines need to be part of decarbonisation”. This position appears to be <i>echoed</i> in a February 2022 joint statement on the Fit for 55 proposal, signed by easyJet, and in <i>September 2021</i> and <i>June 2021</i> press releases. In June 2022, easyJet <i>commissioned</i> a report which appeared to support an extension to all international flights, concluding that 73% of emissions savings would be jeopardized by limiting EU climate measures to intra-EEA. Politico further <i>reported</i> that easyJet is “dead-set against the exclusion of feeder flights” in June 2022.</p>	<p>1</p>
<p><i>Wizz Air</i></p>	<p>Mixed</p>	<p>A February 2022 joint statement, signed by Wizz Air, appeared to <i>support</i> the expansion of the EU ETS to include international (EEA to/from non-EEA) flights, referencing a study that “showed that extending the EU ETS to cover all flights would have the greatest positive impact on EU27 employment and GVA”. Additionally, a November 2021 EU public consultation response <i>urged</i> the inclusion of private jets while also describing the accelerated phase-out of free emissions allowances as “a positive move”. However, Wizz Air also <i>emphasized</i> that the company “does not support the double taxation of the CO2 emissions under the different schemes (ETS, kerosene tax) of the Fit for 55 legislative package also combined with rising fuel prices in the mid to long term”.</p>	<p>2</p>

Aircraft Manufacturer	Position	Evidence	
<i>Airbus</i>	Positive	In a private <i>meeting</i> between Airbus and DG MOVE in September 2021, obtained through a freedom of information request, Airbus seemed to support a higher EU ETS price. In a September 2021 response to a UK Parliamentary Committee, Airbus <i>stated</i> it prefers the EU ETS and CORSIA to national taxes.	3
<i>Boeing</i>	Undisclosed	N/A	0

Kerosene jet fuel taxation			
Industry Association	Position	Evidence	No. of Meetings with rapporteurs for Energy Taxation Directive
<i>Airlines for Europe (A4E)</i>	Negative	In a private meeting between A4E CEOs and DG MOVE in June 2021, obtained by InfluenceMap through a freedom of information request, A4E appeared to <i>directly advocate</i> against an EU kerosene tax to policymakers. Similarly, in a July 2021 statement, A4E <i>argued</i> that an EU kerosene tax “could lead to a competitive distortion within Europe’s internal market and globally”. A March 2022 position paper further <i>stated</i> “A4E and its members are categorically opposed to ending the kerosene tax exemption”, taking a similar position in a <i>September 2021 fact sheet</i> . Two EU consultation responses from November 2021 also appeared to communicate <i>strong opposition, arguing</i> that an EU kerosene tax “will lead to an intolerable increase in the cost of flying intra-EU while having a limited impact on emissions”. A4E’s Managing Director, Thomas Reynaert, also <i>described</i> an EU jet fuel tax as “the least effective measure to effectively reduce CO ₂ going forward” at the September 2021 Airbus summit and <i>questioned</i> the environmental impact of the Dutch kerosene tax according to a July 2021 Le Figaro report. Reynaert further appeared unsupportive of an EU kerosene tax at the Routes Europe 2022 summit in May 2022, according to a <i>Twitter</i> post.	0
<i>International Air Transport Association (IATA)</i>	Negative	IATA’s Director-General, Willie Walsh, appeared to <i>oppose</i> an EU jet fuel tax in a July 2021 press release, stating that “we should all be worried that the EU’s big idea to decarbonize aviation is making jet fuel more expensive through tax [...] Taxation will destroy jobs”. A May 2022 IATA blog also <i>described</i> the EU kerosene tax as “greenwash”. An IATA senior executive also appeared to <i>advocate</i> for the kerosene tax to be “dropped” at the May 2022 Routes Europe summit.	0

Airline	Position	Evidence	
<i>Air France-KLM</i>	Negative	In a July 2021 press release, KLM appeared to emphasize a lack of environmental impact to oppose an EU kerosene tax, <i>asserting</i> the measure “may well have the opposite effect, leading to aircraft flying longer routes to circumvent the tax and thereby increasing emissions”. An email to DG MOVE in October 2021, obtained by InfluenceMap through a freedom of information request, further <i>stated</i> Air France-KLM is “not supporting the introduction of a kerosene tax which does not help to make our sector more sustainable”. An October 2021 NRC article also <i>reported</i> opposition to an EU jet fuel tax from KLM’s CEO, Pieter Elbers. Moreover, the Aviation Alliance declaration, <i>endorsed</i> by Air France-KLM CEO, Ben Smith, in January 2022, appeared to oppose an EU kerosene tax.	0
<i>International Airlines Group (IAG)</i>	Negative	In a February 2022 position paper, IAG appeared to <i>oppose</i> an EU jet fuel tax and urged “EU Institutions not to remove the exemption of jet fuel taxation”. IAG also <i>recommended</i> continued jet fuel tax exemption for intra-EU flights in a second position paper from February 2022. IAG also <i>stated</i> that it “does not support the energy taxation directive” in its 2021 CDP response.	0
<i>Lufthansa</i>	Negative	Lufthansa’s 2021 Annual Report, published in March 2022, appeared to communicate <i>opposition</i> to an EU kerosene tax, stressing carbon leakage and competitiveness concerns. The Aviation Alliance declaration endorsed by Lufthansa’s CEO, Carsen Spohr in January 2022, appeared opposed to an EU jet fuel tax, <i>stating</i> the tax “would have negative impact on Europe’s air transport sector”. According to a July 2021 Financial Times report, Lufthansa further <i>argued</i> a kerosene tax, alongside other EU climate measures, would “hobble European airlines”.	1
<i>Ryanair</i>	Negative	Ryanair’s 2021 Sustainability report, published in November 2021, appeared to oppose an EU kerosene tax, <i>asserting</i> that the tax “will not achieve” the EU’s 2050 carbon neutrality goal as it does not apply to long-haul carriers. <i>Two consultation</i> responses <i>from Ryanair</i> in November 2021 also appeared to oppose an EU kerosene tax. Ryanair’s 2021 financial results, published in July 2021, further <i>stated</i> “Ryanair is fundamentally opposed to the introduction of additional aviation taxes, including new environmental taxes, fuel taxes or emissions levies”. However, more positively, Michael O’Leary appeared <i>supportive</i> of an EU jet fuel tax for all international (EU to/from non-EU) flights, with the exception that it replaced all other climate regulations, in a statement at the November 2021 Eurocontrol summit.	0

<i>easyJet</i>	Mixed	easyJet's 2021 Annual Report, published in December 2021, suggested <i>support</i> for an EU jet fuel tax applied to all flights, with the exception that the fuel tax replaces "all the ineffective passenger taxes in Europe" and is combined with a "flight tax for long-haul flights that reflects their emissions". This position is <i>echoed</i> in a June 2021 press release. At the November 2021 Eurocontrol summit, easyJet CEO, Johan Lundgren, appeared <i>supportive</i> of an EU kerosene tax if it replaced national ticket taxes. A September 2021 press release also appeared to <i>express</i> support for the inclusion of long-haul flights in the EU kerosene tax.	0
<i>Wizz Air</i>	Mixed	Wizz Air's 2021 CDP response <i>disclosed</i> that it supports either "a full scope kerosene tax", including long-haul and cargo flights, or no kerosene tax at all. In response to a November 2021 EU public consultation, Wizz Air appeared <i>unsupportive</i> of an EU kerosene tax while advocating for the taxation of kerosene for cargo flights. Furthermore, Wizz Air's Q1 F22 results, published in July 2021, <i>stated</i> "we are not supportive of the taxation on kerosene given: it excludes taxation on cargo-only flights (giving a pass to legacy carriers)...it is limited to intra-EEA flights only".	0
Aircraft Manufacturer	Position	Evidence	
<i>Airbus</i>	Negative	The Financial Times <i>reported</i> in July 2021 that Airbus' CEO, Guillaume Faury, "hit out" against the proposed EU jet fuel tax, stating "I completely disagree with it".	0
<i>Boeing</i>	N/A	N/A	0

National ticket taxes		
Industry Association	Position	Evidence
Airlines for Europe (A4E)	Negative	A4E's Managing Director, Thomas Reynaert, appeared to oppose Belgium's ticket tax at the A4E Aviation Summit in March 2022. A Le Figaro report published in July 2021, also suggested opposition to French ticket taxes from A4E's Managing Director, Thomas Reynaert, who stated the taxes "do virtually nothing to reduce emissions". A July 2021 press release also suggested that A4E is generally unsupportive of national ticket taxes.
International Air Transport Association (IATA)	Negative	In response to a June 2021 UK public consultation, obtained by InfluenceMap by Freedom of Information request, IATA appeared to support a reduction in the domestic Air Passenger Duty while arguing that "abolishing the APD would offer even greater economic and consumer benefits to the UK". According to a March 2022 Routes report, IATA also criticized the timing of the Belgium ticket tax. IATA further appeared unsupportive of ticket taxes in evidence submitted to a UK Parliamentary committee in March 2022 and IATA CEO, Willie Walsh, also stated "APD should be scrapped" in a November 2021 testimony to UK Parliament. In an October 2021 press release, IATA CEO, Willie Walsh, further appeared to oppose the UK's APD, stating "masquerading this cash grab as a green tax the week before COP26 is the height of political hypocrisy".
Airline	Position	Evidence
Air France-KLM	Negative	Air France-KLM's 2020 CSR report webpage, accessed in June 2021, appeared opposed to French and Dutch ticket taxes, stating "the Group is against any national air passenger tax". In its 2021 CDP response, Air France-KLM also disclosed opposition to ticket taxes in France and the Netherlands.
International Airlines Group (IAG)	Negative	IAG's response to a UK Parliamentary committee in September 2021 and March 2022 appeared to oppose the UK's Air Passenger Duty (APD), describing the ticket tax as "an extremely ineffective way to try to cut carbon emissions". Moreover, in response to a June 2021 UK public consultation, obtained by InfluenceMap by FOI request, IAG supported a reduced domestic APD while arguing that long-haul APD has a "detrimental impact on connectivity". According to an October 2021 City AM article, IAG's CEO, Luis Gallego further opposed an increase to the UK's APD for long-haul flights.
Lufthansa	Negative	According to a March 2022 Routes report, Brussels Airlines CEO, Peter Gerber, a Lufthansa subsidiary, opposed the Belgium ticket tax and stated "it's a disappointing development".

<i>Ryanair</i>	Negative	Ryanair appeared generally <i>unsupportive</i> of ticket taxes in its 2021 Sustainability Report, published in November 2021, stating “taxes make it more difficult for airlines to achieve climate gains”. In a Ryanair UK public consultation on the Air Passenger Duty in June 2021, obtained by InfluenceMap by FOI request, Ryanair <i>asserted</i> that it has “long advocated that APD should be abolished” while supporting reduced domestic APD. In testimony to the Transport Committee in June 2021, Ryanair CEO, Michael O’Leary, also appeared to support <i>suspending</i> the “egregious and regressive” APD due to the Covid-19 pandemic. An October 2021 SimpleFlying article also reported Ryanair’s CEO, Michael O’Leary <i>emphasized</i> a lack of environmental impact to oppose the APD. However, in a February 2022 Twitter post, Ryanair appeared to <i>advocate</i> for the inclusion of all short-haul flights, including transfer flights, within Belgium’s ticket tax.
<i>easyJet</i>	Negative	easyJet’s 2021 Annual Report, published in December 2021, appeared to <i>advocate</i> for the replacement of ticket taxes with a fuel tax for intra-EU (EU to/from EU) flights and a flight tax for international (EU to/from non-EU) flights. Similarly, at the November 2021 Eurocontrol summit, easyJet CEO, Johan Lundgren, appeared to <i>advocate</i> for national ticket taxes to be replaced through a jet fuel tax. easyJet also appeared to advocate for the UK’s Air Passenger Duty to be replaced through a carbon tax, alongside <i>supporting</i> reduced domestic APD and increased long-haul rates, in a June 2021 UK public consultation obtained by InfluenceMap by Freedom of Information request. At the A4E Aviation Summit in March 2022, easyJet CEO, Johan Lundgren, appeared to <i>oppose</i> ticket taxes on flights. easyJet also appeared generally <i>unsupportive</i> of ticket taxes in evidence submitted to a UK Parliamentary committee in March 2022.
<i>Wizz Air</i>	Negative	In its 2021 CDP response, Wizz Air appeared <i>opposed</i> to a UK Air Passenger Duty, instead proposing a carbon tax. Similarly, in response to a June 2021 public consultation, obtained by InfluenceMap by Freedom of Information request, Wizz Air <i>asserted</i> the proposed APD may be “counterproductive” to the UK’s environmental goals and advocated for an APD based on carbon emissions per passenger per kilometer.
Aircraft Manufacturer	Position	Evidence
<i>Airbus</i>	N/A	N/A
<i>Boeing</i>	N/A	N/A

EU Sustainable aviation fuels mandate			
Industry Association	Position	Evidence	No. of meetings with rapporteurs for ReFuelEU
<i>Airlines for Europe (A4E)</i>	Mixed	A4E appeared to <i>advocate</i> in a January 2022 position paper that an EU SAF blending mandate should only be introduced in “mature market conditions”. A March 2022 position paper similarly appeared to <i>propose</i> that an EU SAF mandate should only be introduced if accompanied by measures incentivizing SAFs “at least until SAF market maturity has improved by 2035”. In an April 2022 YouTube video, A4E emphasized cost concerns regarding a SAF mandate, and appeared to <i>advocate</i> for a “financial support strategy”. However, more positively in a June 2022 press release, A4E <i>supported</i> the EU Commission’s proposed 5% SAF blending mandate, while appearing to oppose national blending mandates, and opposing an EU Parliamentary proposal to increase the mandate to 6%, emphasizing concerns around sustainable feedstock availability, according to a June 2022 press release. In two November 2021 <i>EU public consultation responses</i> , A4E also stated <i>support</i> for the proposed EU SAF mandate and e-fuels sub-mandate. A4E Managing Director, Thomas Reynaert, also <i>described</i> the EU SAF mandate as “one of the great things” in the Fit for 55 package at the September 2021 Airbus Summit.	2
<i>International Air Transport Association (IATA)</i>	Negative	In amendments to the ReFuelEU legislative proposal in January 2022, IATA appears <i>unsupportive</i> of the inclusion of extra-EU (EU to/from non-EU) flights, while stating the synthetic fuels sub-mandate “should be eliminated”. A May 2022 IATA blog also <i>emphasized</i> logistical concerns around a SAF mandate and opposed the inclusion of all international flights. A second May 2022 blog appeared opposed to national and EU SAF mandates, with an IATA senior executive <i>stating</i> “mandates don’t help”. An IATA Fact Sheet, accessed in June 2022, further appeared <i>unsupportive</i> of an EU SAF mandate, stating “a mandate policy is not IATA’s preferred option”. However, a July 2021 press release appeared to <i>support</i> an EU SAF mandate with the exception it is accompanied by “policy measures to ensure competitive market and appropriate production incentives”.	2

Airline	Position	Evidence	
Air France-KLM	Mixed	A July 2021 KLM press release appeared to <i>support</i> an EU SAF mandate, while a February 2022 joint statement, signed by Air France and KLM, <i>advocated</i> for the EU to be “more ambitious about the scale and timing of e-kerosene deployment”. More negatively, in January 2022, Air France-KLM CEO, Ben Smith, endorsed the Aviation Alliance declaration which emphasized cost and competitiveness concerns regarding an EU SAF mandate and <i>proposed adjustments</i> , such as a “price gap” mechanism for extra-EU traffic, an “adjustment mechanism for all passengers departing from the EU and transferring at a non-EU hub” and equal treatment for transfer passengers via EU and non-EU hubs that may weaken the stringency of the policy. Air France-KLM CEO, Ben Smith, also <i>warned against</i> the inclusion of long-haul flights in an EU SAF mandate according to a June 2021 Reuters report.	2
International Airlines Group (IAG)	Mixed	In a February 2022 position paper, IAG appeared <i>unsupportive</i> of including all international (EEA to/from non-EEA) flights in the EU SAF mandate, while advocating for delayed e-fuel sub-mandates until “these technologies have been practically demonstrated at scale” and for the increased ambition of intra-EEA SAF targets to 10-15%. In a second February 2022 position paper, IAG <i>echoed</i> its position on the inclusion of all international flights and delayed e-fuel sub-mandates, while supporting a global SAF mandate. Similarly, in a January email to the EU Commission, obtained through an FOI request, IAG <i>advocated</i> to “reduce the SAF mandate to intra-EU scope” while appearing to support a slower phase-in of the mandate. In contrast, through the endorsement of the Clean Skies for Tomorrow Report, published in July 2021, IAG appeared to <i>support</i> an EU SAF mandate if it does not affect competitiveness. More positively, IAG appeared to support <i>increasing</i> the 2030 SAF mandate to 6% from 5%, as proposed by the EU Council, in a June 2022 media report.	1
Lufthansa	Mixed	Lufthansa’s 2021 Annual Report, published in March 2022, appeared <i>unsupportive</i> of an EU SAF mandate, arguing it would “not only increase fuel costs for the Lufthansa Group, but result in a further distortion of competition in long-haul traffic”. In January 2022, Lufthansa CEO endorsed the Aviation Alliance declaration which appeared to emphasize cost and competitiveness concerns regarding an EU SAF mandate and <i>propose adjustments</i> , such as a “price gap” mechanism for extra-EU traffic, an “adjustment mechanism for all passengers departing from the EU and transferring at a non-EU hub” and equal treatment for transfer passengers via EU and non-EU hubs. Lufthansa’s 2021 Sustainability Fact Sheet, published in 2022, also appeared <i>unsupportive</i> of an EU SAF mandate. In June 2022, Lufthansa comments in a Skift media report <i>stressed</i> carbon leakage and competitiveness concerns with the EU Council’s general agreement on an EU SAF mandate. More positively, despite emphasizing carbon leakage concerns, a senior Lufthansa executive appeared <i>supportive</i> of an EU SAF mandate at a November 2021 Eurocontrol meeting, also stating “I do not agree that we cannot have a mandate that extends beyond the EU”. A joint letter to EU policymakers, signed by Lufthansa in July 2021, also <i>directly advocated</i> to support an e-kerosene mandate “commencing already in 2027 at 0.5% to 1%...the mandate could potentially rise to 2.5% in 2030”.	0

<p><i>Ryanair</i></p>	<p>Positive</p>	<p>Ryanair appeared to support an EU SAF mandate in its 2021 Sustainability report, published in November 2021, <i>stating</i> “we welcome mandatory SAF blending of 5% by 2030”. A February 2022 joint statement, signed by Ryanair, further advocated for the inclusion of long-haul flights within the mandate by <i>urging</i> policymakers to “resist pressure to exclude long-haul networks”. Another February 2022 joint statement signed by Ryanair echoed support for the EU SAF mandate and appeared to <i>advocate</i> for the regulation to be “more ambitious about the scale and timing of e-kerosene deployment”. In a public consultation response in November 2021, Ryanair appeared to support the EU’s SAF mandate, <i>asserting</i> it is “the only measure of the Fit to 55 package that will significantly reduce aviation emissions”, while also emphasizing cost and competitiveness concerns. Ryanair’s CEO, Michael O’Leary, appeared supportive of an EU SAF mandate according to an October 2021 CNBC article, yet also <i>emphasized</i> SAF supply concerns in a November 2021 interview with Eurocontrol, stating “there’s no point in mandating unless you can deliver a supply”.</p>	<p>4</p>
<p><i>easyJet</i></p>	<p>Positive</p>	<p>easyJet’s 2021 Annual Report, published in December 2021, appeared to <i>advocate</i> for the inclusion of long-haul flights in the EU SAF mandate, asserting that “all airlines need to be part of decarbonisation”. Similarly, a February 2022 joint statement, signed by easyJet, appeared to <i>support</i> the EU’s SAF mandate and the inclusion of long-haul flights within the mandate by urging policymakers to “resist pressure to exclude long-haul networks”. easyJet appeared to echo this position in <i>July 2021</i> and <i>September 2021</i> press releases. In another joint statement published in February 2022, easyJet appeared to <i>advocate</i> for the EU SAF mandate to be “more ambitious about the scale and timing of e-kerosene deployment”. Moreover, easyJet CEO, Johan Lundgren, appeared to oppose the omission of long-haul carriers from the EU SAF mandate, <i>questioning</i> “how does that make sense?” at the September 2021 Airbus summit. However, at the November 2021 Eurocontrol summit, easyJet CEO, Johan Lundgren, appeared to <i>emphasize cost and supply concerns</i> around a biofuels mandate, while supporting an e-fuel mandate.</p>	<p>3</p>
<p><i>Wizz Air</i></p>	<p>Positive</p>	<p>In February 2022, Wizz Air signed a joint statement supporting the EU’s SAF mandate and advocating for the inclusion of long-haul flights within the mandate by <i>urging</i> policymakers to “resist pressure to exclude long-haul networks”. Additionally, evidence from a June 2021 Reuters report suggested <i>support</i> for the inclusion of all international (EEA to/from non-EEA) flights in the EU SAF mandate from Wizz Air’s CEO, Jozsef Varadi.</p>	<p>1</p>

Aircraft Manufacturer	Position	Evidence	
Airbus	Mixed	<p>In July 2021, as part of the Clean Skies for Tomorrow Coalition Insight Report, Airbus appeared to <i>support</i> an EU SAF mandate, with the exception that it should not affect competitiveness. In a December 2021 Op-ed, an Airbus senior executive appeared to <i>support</i> an EU SAF mandate with the exception that “all mandates must come with added economic measures...to support airlines in remaining competitive”. In a <i>private meeting</i> between Airbus and DG MOVE In September 2021, obtained by InfluenceMap through a freedom of information request, Airbus appeared to support a more ambitious ReFuelEU Aviation initiative, while also highlighting cost concerns. Additionally, in a December 2021 Op-ed, Airbus CEO, Guillaume Faury, appeared to <i>support</i> an EU SAF mandate, with the exception that it is harmonized throughout the EU.</p>	3
Boeing	Positive	<p>Boeing in July 2021, as part of the Clean Skies for Tomorrow initiative, appeared to <i>support</i> an EU SAF mandate if the measure does not affect competitiveness. Additionally, in comments submitted to a November 2021 <i>EU public consultation</i>, Boeing appeared supportive of the EU's SAF mandate and stated “Boeing appreciates the steps the European Commission is taking to advance the commercialization of sustainable aviation fuels (SAF) by implementing a blending mandate”.</p>	0

Appendix 4: Disclosed Aviation Lobbying Spend in Europe

Industry association	Declared lobbying spend in Europe ²	Financial year
<i>Airlines for Europe (A4E)</i>	€1,125,000	01/2021 - 12/2021
<i>International Air Transport Association (IATA)</i>	€950,000	12/2020 - 11/2021
Airline		
<i>Air France-KLM</i>	€850,000	01/2020 - 12/2020
<i>International Airlines Group (IAG)</i>	€350,000	01/2020 - 12/2020
<i>Lufthansa</i>	€550,000	01/2021 - 12/2021
<i>Ryanair</i>	€250,000	04/2020 - 03/2021
<i>easyJet</i>	€150,000	10/2020 - 09/2021
<i>Wizz Air</i>	€75,000	04/2020 - 03/2021
Aircraft Manufacturer		
<i>Airbus</i>	€1,375,000	01/2020 - 12/2020
<i>Boeing</i>	€550,000	01/2020 - 12/2020
Total combined lobbying spend	€6,225,000	

² Data taken from the *EU Transparency Register*. Data used is an average of estimated disclosed figures (e.g., €950,000 when disclosed estimate is €900,000 - €999,999) and €0 if costs of < €9,999 are disclosed.