

President of the European Commission, Ursula Von der Leyen  
President of the European Parliament, David Sassoli  
President of the European Council, Charles Michel

*By email*

3 December 2020

## 33 NGOs call for measures to reduce total climate impact of air transport

Dear Presidents of the European Commission, European Council, and European Parliament,

In the context of the current climate and health crises, we, the undersigned organisations, demand that action be taken in response to the newly released [updated analysis of the non-CO<sub>2</sub> climate impacts of aviation](#) by the European Commission, as required by the 2017 ETS directive. Now that air traffic's non-CO<sub>2</sub> impacts are officially acknowledged, **immediate political action must follow to mitigate aviation's total climate impact as soon as possible. The most effective way to do so is to ensure air travel is reduced and does not return to pre-COVID levels.**

For years, the sector has pushed to focus on being responsible for "only" 2% of human-made carbon emissions<sup>1</sup> – a number consistently cited to downplay the need for action. This has led to a failure to properly regulate aviation for its impact. **Non-CO<sub>2</sub> impacts are not accounted for in any reporting systems or regulations<sup>2</sup>.**

The [report](#) produced by the European Aviation Safety Agency (EASA) underlying the European Commission's [analysis](#) acknowledges that **aviation's impact on the climate is approximately three times that of CO<sub>2</sub> alone**: non-CO<sub>2</sub> impacts mainly those of contrail cirrus and NO<sub>x</sub> are, overall, twice as bad for the climate as those of CO<sub>2</sub><sup>3</sup>. A very small segment of the population actually flies and is therefore responsible for a relatively large contribution to climate heating. According to a new study, **1% of the world population causes half of global aviation emissions**, with many frequent flyers being European<sup>4</sup>. With lives and livelihoods on the line across the globe including in Europe, we cannot neglect any area where emissions can be reduced.

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<sup>1</sup> See [IATA \(2020\)](#)

<sup>2</sup> Non-CO<sub>2</sub> impacts are not accounted for in the national greenhouse gases (GHG) inventory submissions to the UNFCCC, the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), nor the EU Emissions Trading System (ETS).

<sup>3</sup> Using the method of GWP\* which is proposed in the EASA report, Stay Grounded calculated that from oil well through flights, [aviation accounts for 5.9% of all human-induced climate heating](#), when including non-CO<sub>2</sub> impacts.

<sup>4</sup> [Gössling et al. \(2020\)](#)

Although the EASA report and the EU Commission recommend several potential policy actions to reduce non-CO<sub>2</sub> impacts of aviation, it is alarming that none of the measures are seen as applicable in the next five to eight years. In addition, many of them will not produce significant results until well after their implementation. In light of the urgency to act against climate heating, **delaying action is unacceptable**. The European Union has the responsibility to reduce aviation emissions, and ensure we do not return to pre-pandemic numbers.

**We therefore demand that the following steps are taken as part of the upcoming EU Mobility Strategy and other relevant legislative files:**

- 1. Measures must be implemented to reduce intra-EU and international flights.**  
Short haul flights must be banned where there is a cleaner alternative and construction and expansion of airports must cease. All subsidies to airlines and airports must stop, including the tax exemptions on tickets and fuel. Instead of giving unconditional bailouts to the aviation industry, recovery packages must finance a just transition process for the workers, towards a sustainable transport system, with investments for alternatives like rail travel and renewable-powered ships.
- 2. Non-CO<sub>2</sub> impacts have to be fully accounted for by the EU and member states.**  
Under the precautionary principle, the amount of CO<sub>2</sub> emitted by aircraft must be tripled in GHG reporting systems, including in national emissions inventories.
- 3. Promising solutions to mitigate non-CO<sub>2</sub> impacts such as contrail avoidance must be pursued without delay.<sup>5</sup>** The EU must give visibility on the regulation of non-CO<sub>2</sub> impacts that could influence the choice of technologies and fuels for the aircrafts of the future. It needs to do so much earlier than in 5-8 years time due to the lengthy lead times associated with their development and certification.

We are looking forward to receiving your response.

Yours sincerely,



Jorgo Riss  
Executive Director, Greenpeace European Unit

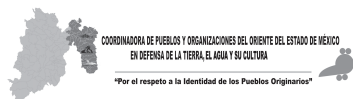


Magdalena Heuwieser,  
Spokesperson, Stay Grounded

Also on behalf of:

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<sup>5</sup> Simulations have shown that minor changes in the altitude of a small proportion of flights could eliminate most of the contrails.



**Signatories (alphabetically):**

AbibiNsroma Foundation,  
Airport Watch,  
Alofa Tuvalu,  
Am Boden bleiben,  
Aterra,  
BAW Fluglaerschutz Hamburg und Schleswig-Holstein,  
CAN Europe (Climate Action Network),  
Carbon Market Watch,  
cBalance solutions hub,  
Coordination of Indigenous Peoples and Organisations Eastern Mexico State CPOOEM,  
Ecologistas en Acción,  
Erasmus by Train,  
Flight Free Australia,  
Flight Free Germany,  
Germanwatch,  
Global Anti-Aerotropolis Movement,  
Greenpeace,  
Milieu Defenseie,  
NOAH - Friends of the Earth Denmark,  
Periskop,  
Protect Our Winters Europe,  
Réseau Action Climat France,  
Robin Wood,  
Safe Landing,  
Schipholwatch,  
Stay Grounded,  
Transport & Environment,  
UECNA (European Union Against Aircraft Nuisance),  
UFCNA (Union Francaise Contre les Nuisance des Aéronefs),  
Umanotera,  
Zaļā brīvība,  
Zomer Zonder Vliegen,  
350 Seattle.