

Green (F)lying

Two years on



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NB: The evidence presented in this report and compiled in its <u>Annex</u> was collected by BEUC members and students from Vrije Universiteit Amsterdam between January and May 2025.

Summary

In June 2023, BEUC and 23 of its members from 19 countries lodged an EU-wide complaint against 17 European airlines for greenwashing. In April 2024, the CPC-Network decided to expand the scope of the complaint and announced the launch of an investigation into 20 airlines.² Consumer authorities under the lead of the Belgian, Dutch, Norwegian and Spanish national agencies³ engaged with the concerned traders to change their marketing practices.

Our findings two years on

Based on a new evidence-gathering and two years after we launched our 'Green (f)lying' action we found that:

- Some airlines have removed or changed their climate-related marketing claims. This appears to be a result of the actions launched by consumer groups and other civil society organisations ⁴ as well as of the exchanges between airlines and consumer protection authorities. ⁵
- However, greenwashing continues to be widespread, and some changes have been limited (such as light changes in the wording and/or colour codes). Consumers are overall still being faced with the false impression that they are choosing a sustainable transport method rather than a highly polluting one.
- Airlines' green claims continue to rely on two key arguments: As shown in our 2023 action, claims mainly misrepresent the impact of the flight through reliance on 'offsetting' claims and oversell the trader's future goals and plans.
- 'Green fares' are increasingly popular. The airlines which are part of the Lufthansa group registered a steady rise of such fares, which grant consumers extra miles or loyalty points.⁶
- Regulatory contexts are getting stricter in Europe and beyond. An increasing number of authorities and court decisions have clarified when and how climate-related claims can be admissible.

¹ BEUC 'Green (F)lying' enforcement action webpage: www.beuc.eu/enforcement/green-flying.

² European Commission, 'Commission and national consumer protection authorities starts action against 20 airlines for misleading greenwashing practices', press release, 30 April 2024,

https://ec.europa.eu/commission/presscorner/detail/en/ip_24_2322, (accessed 5 June 2025).

³ The Belgian Directorate General for Economic Inspection, the Netherlands Authority for Consumers and Markets, the Norwegian Consumer Authority and the Spanish Directorate General of Consumer Affairs.

⁴ Such as Fossielvrij Netherlands, Reclame Fossielvrij, ClientEarth and other civil society organisations mentioned in this report.

⁵ For example, Norwegian has removed all climate-related claims during the booking process (see <u>Annex p.53</u>), Wizz Air has removed the option of offsetting CO2 emissions during the booking process (<u>Annex p.109</u>), Ryanair has removed the "compensate your estimated CO2 emissions" option from the booking process (<u>Annex p.59</u>) and Vueling has removed the option to add an extra fee to contribute to sustainable fee during the booking process (<u>Annex p.59</u>). Luxair no longer makes climate-related claims.

⁶Lufthansa group, 'One year of Green Fares at the Lufthansa Group: More than one million passengers choose new fare for more sustainable travel', press release, 18 March 2024,

https://newsroom.lufthansagroup.com/en/one-year-of-green-fares-at-the-lufthansa-group-more-than-one-million-passengers-choose-new-fare-for-more-sustainable-travel/, (accessed 5 June 2025)

See also S. Truxal and T. Aras, 'Charting a 'Green' Flight Path for European Consumer?' (2025), EuCML, 1/2025.

The specific case of Lufthansa Group

In parallel, some airlines have decided to charge an "Environmental Cost Surcharge" for flights operating in/from Europe. This is the case of airlines belonging to the Lufthansa Group imposing an additional €72 fee. Airlines have argued that this move would be necessary to face the high additional costs arising from regulatory requirements. Yet Lufthansa's decision to pass the costs of the environmental transition onto consumers must be put in perspective:

- The aviation sector is on the rise: according to the International Air Transport Association (IATA), air travel reached records both domestically and internationally with a 10.4% demand growth and 83.5% of all airplane seats offered were filled. IATA expects that the demand will continue to grow in 2025.8 Net profit of the airlines industry is expected to raise from USD 32.4 billion in 2024 to USD 36 billion in 2025 (and USD 9.6 billion in 2024 to USD 11.3 billion in 2025 for Europe let alone).9
- The aviation sector remains heavily subsidised, with many airlines receiving state support ¹⁰ (for example, in 2020 Lufthansa received EUR 6 billion from the German government to face the COVID-19 pandemic)¹¹ or benefiting from various tax exemptions.¹²
- Lufthansa's profits have taken off. The group reported EUR 1.38 billion profits in 2024¹³, up from EUR 790 million in 2022. It represents a nearly 75% increase in two years.

Our call to consumer protection authorities

We welcome the work that the European Commission and the CPC-Network have been carrying out since 2023. The high number of airlines investigated and the fact that claims have a direct impact on traders' business models contributed to increasing the length of the discussions. Despite this, practices have started to improve. It remains essential that the CPC-Network sends a clear message to the airline sector that claims presenting flying as sustainable or contributing to sustainability are misleading. Instead, airlines should clearly inform consumers of the impact of flying when purchasing tickets. At a time when many consumers are seeking to travel more sustainably 14, presenting flying as a sustainable option discourages them from considering more sustainable alternatives, such as reducing air travel or taking the train when possible.

⁷ It applies to flights operating in the EU Member States, from the UK, Norway and Switzerland.

From Brussels Airlines, 'Environmental Cost Surcharge', www.brusselsairlines.com/be/en/flying-with-us/social-responsibility/environmental-cost-surcharge, (accessed 5 June 2025)

⁸ IATA, 'Global Air Passenger Demand Reaches Record High in 2024', press release, 30 January 2025 https://www.iata.org/en/pressroom/2025-releases/2025-01-30-01/, (accessed 5 June 2025)

⁹ In 2025, Europe will be the second region worldwide in terms of net profit just after North American with 12.7 billion USD expected in 2025). From IATA, 'Industry statistics' factsheet, www.iata.org/en/iata-repository/pressroom/factsheets/industry-statistics, (accessed 5 June 2025)

¹⁰ Transport & Environment, 'Price of aviation', www.transportenvironment.org/topics/planes/price-of-aviation, (accessed 5 June 2025)

¹¹ European Commission, 'State aid: Commission approves €6 billion German measure to recapitalise Lufthansa', press release, 25 June 2020, https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1179, (accessed 5 June 2025)

¹² Transport & Environment, 'Irish government lost out on close to 760 million in aviation taxes last year', press release, 12 July 2023, www.transportenvironment.org/articles/irish-government-lost-out-on-close-to-760-million-in-aviation-taxes-last-year, (accessed 5 June 2025)

¹³ Lufthansa Group, 'Annual report 2024, Connecting People, Cultures and Economies in a Sustainable Way', LH-AR-2024-e.pdf, p. 3, (accessed 5 June 2025).

¹⁴ According to a Eurobarometer study of April 2025, more than three quarters of respondents replied that environmental impact is important to them when planning a regional or long-distance journey. From https://europa.eu/eurobarometer/surveys/detail/3178, (accessed 5 June 2025).

To ensure consumers are no longer misled, consumer groups from the BEUC network are committed to keep monitoring closely airlines' green claims and whether commitments taken by airlines are respected.

2023-2025 - Greenwashing in the aviation sector: a changing context

Over the past two years, an increasing number of actions were filed before authorities and courts against airlines' climate-related claims suspected to mislead consumers. Several of them led to decisions which have progressively contributed to improving clarity on these contentious practices. Below is a non-exhaustive list of actions and decisions.

The EU Unfair Commercial Practices Directive (UCPD) is today the main instrument used to challenge climate-related claims in the aviation sector. By September 2026, a new piece of EU legislation will enter into force and amend the UCPD by explicitly prohibiting misleading green claims, such as those made by airlines.¹⁵

Across Europe

2023

Austrian September 2023 (sustainable aviation fuels – 'SAF'): Following a complaint by BEUC's Austrian member Verein for Konsumenteninformation (VKI), the Korneuburg Regional Court ruled that Austrian Airlines statement "Flying CO2-neutrally to the Biennale? Not art for us! 100% SAF", in combination with "Together with Vienna Airport and Venezia Airport, we are bringing you to the Arte Biennale in Venice with sustainable aviation fuel (SAF)" were misleading. The court ruled that all flights currently rely on kerosene. Although a small percent of emissions can be eliminated through the addition of SAF, carbon is still emitted, making Austrian Airlines' promise false. No financial penalties were given, but Austrian Airlines must provide passengers with more transparency regarding the airline's use of SAF and net-zero emissions programmes. The sustainable aviation fuel (SAF) and net-zero emissions programmes.

UK, November 2023 (net-zero by 2050): The environmental organisation **Possible** filed a complaint against **British Airways** for statements such as "driving urgent action towards net zero emissions" and "clear roadmap to achieving net zero carbon emissions by 2050", even though a study carried out by Possible found that British Airways emissions from jet fuel had increased between 2016 and 2019. Possible also filed a complaint against Virgin Atlantic, alleging that its emissions targets were misleading consumers.¹⁸ The case is pending.

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¹⁵ The 'Empowering Consumers for the Green Transition' European Directive' bans vague, unverifiable environmental claims and prohibits claims of climate neutrality based on carbon offsetting. Companies must support future environmental promises (e.g., climate neutrality by 2050) with realistic, publicly available, independently verified plans, and regularly report on their progress.

¹⁶ Verein für Konsumenteninformation, 'VKI erwirkt Greenwashing-Urteil gegen Austrian Airlines', *Verbraucherrecht*, 30 June 2023, https://verbraucherrecht.at/vki-erwirkt-greenwashing-urteil-gegen-austrian-airlines/67062, (accessed 5 June 2025).

¹⁷ Dr. Omar Memon, 'Court Finds Austrian Airlines Guilty Of Greenwashing', *Simple Flying*, 1 October 2023, https://simpleflying.com/court-finds-austrian-airlines-guilty-greenwashing/, (accessed 5 June 2025).

¹⁸ OECD Watch, 'Possible vs. British Airways and Virgin Atlantic', 30 November 2023, www.oecdwatch.org/complaint/possible-vs-british-airways-and-virgin-atlantic/, (accessed 5 June 2025).

UK, December 2023 (net-zero by 2050): The **UK Advertising Standard Authority** (ASA) ruled that **Lufthansa, Air France and Eithad Airways** had used misleading environmental claims through Google ads¹⁹, giving a misleading impression of the airlines' environmental impact.

- **Lufthansa** used among others the phrase "Fly more sustainably". ASA ruled that the claim could be interpreted as having a lower environmental impact than alternative airlines, if choosing to fly with Lufthansa. Lufthansa agreed to remove the phrase from future ads.²⁰
- **Air France** used the phrase "Air France is committed to protecting the environment: travel better and sustainably". ASA concluded that there was no evidence showing that the airline was protecting the environment or making air travel more sustainable.²¹
- Etihad Airways used the phrase "Explore the world with confidence and total peace of mind with Etihad Airways. Environmental advocacy. Award-winning service". As for the case against Air France, there was no evidence showing that the airline could actually offer consumers total peace of mind about the environmental impact. Etihad Airways decided to remove the phrase "Environmental Advocacy" from future ads.²²

2024

Germany, March 2024 (carbon offsetting claims): Environmental organisation Deutsche Umwelthilfe won in court against Eurowings. The airline was accused of using misleading claims suggesting certain products or services were climate neutral, such as: "Travel CO2-Neutral. Together we make flying more sustainable: offset CO2 emissions and take off". The Cologne Regional Court prohibited advertising flights where emissions are offset with a payment as "CO2-neutral" in the form that occurred at the time of the lawsuit with their "Travel CO2-neutral" mechanism.²³

Netherlands, March 2024 (climate-related claims): The **Amsterdam District Court** ruled that several environmental claims used by **KLM** were misleading, both on social media, through physical advertising, website and radio. KLM argued that they should be free to communicate to passengers about their sustainability efforts, while the Court ruled that the statements relied on vague and general information about environmental benefits, thereby misleading consumers. The Court judged that 15 out of 19 claims were misleading. However, the Court did not order a

¹⁹ Reuters, 'UK bans airline adverts over 'misleading' environmental claims', 6 December 2023, www.reuters.com/business/aerospace-defense/uk-bans-airline-adverts-over-misleading-environmental-claims-2023-12-06/, (accessed 6 June 2025).

²⁰ The Advertising Standards Authority, 'ASA Ruling on Deutsche Lufthansa AG t/a Lufthansa, 6 December 2023, A23-1206007', www.asa.org.uk/rulings/deutsche-lufthansa-ag-a23-1206007-deutsche-lufthansa-ag.html, (accessed 6 June).

²¹ The Advertising Standards Authority, 'ASA Ruling on Air France-KLM, 6 December 2023, A23-1206006', https://www.asa.org.uk/rulings/air-france-klm-a23-1206006-air-france-klm.html, (accessed 6 June 2025).

²² The Advertising Standards Authority, 'ASA Ruling on Etihad Airways, 12 April 2023, A23-1206008', www.asa.org.uk/rulings/etihad-airways-a23-1206008-etihad-airways.html, (accessed 6 June 2025).

²³ Deutsche Umwelthilfe, 'Erfolgreiche Klimaklage der Deutschen Umwelthilfe gegen Fluggesellschaft Eurowings, OLG Köln, Judgment of 13 December 2024 – 6 U 45/24' (Deutsche Umwelthilfe v. Eurowings), www.duh.de/presse/pressemitteilungen/pressemitteilung/erfolgreiche-klimaklage-der-deutschen-umwelthilfegegen-fluggesellschaft-eurowings-landgericht-koeln/, (accessed 5 June 2025).

ban for similar misleading claims, meaning that KLM can remove the specific 15 claims, but other comparable claims can still be used. ²⁴

Netherlands, June 2024 (climate-related claims): Following the judgement against KLM by the Amsterdam District Court, the environmental organisations **ClientEarth, Fossielvrij NL and Reclame Fossielvrij** sent a formal warning letter to **71 airlines** operating out of Amsterdam's Schiphol Airport. The letter warned the airlines and highlighted the court ruling, arguing that airlines should not promote common industry claims about "sustainable aviation fuels", "offsetting" and "net zero by 2050" as they are likely to be unlawful.²⁵

UK, August 2024 (SAF): The **UK Advertising Standard Authority** (ASA) ruled that the claim "100% sustainable aviation fuel" used **by Virgin Atlantic Airways** was misleading. After receiving information about the complaint, Virgin conducted a survey to see what people understood from the radio ad using the claim. According to the airline, the survey result showed that the respondents thought that the ad was easy to understand and a majority understood the SAF was better for the environment than traditional fuel, though not without negative consequences. However, ASA pointed out that around 30% wrongly trusted the claim stating that SAF had "zero impact on the environment".²⁶

2025

Denmark, January 2025 (climate-related claims): The **Danish Consumer Ombudsman** filed a complaint against **KLM** for misleading radio advertisement. The advertisement, airing in 2023, included statements such as "(...) now we at KLM are taking a big step towards travelling a little more sustainably." The Danish Consumer Ombudsman takes the view that this type of statement gives consumers the impression that flying with KLM equals better environmental benefits than actually entailed.²⁷

Germany, March 2025 (carbon 'offsetting' claims): The **Cologne Regional Court** banned **Lufthansa** from advertising that passengers could compensate their emissions by financing projects that would "either reduce carbon emissions in the future or remove them from the atmosphere." Because Lufthansa falsely gave the impression that a payment could make a flight carbon-neutral, the court decided that the claims were misleading. ²⁸ The court also prohibited Lufthansa from using the phrase "With our offers for more sustainable flying, you can reduce your

²⁴ ClientEarth, 'District Court of Amsterdam, first instance, 20 March 2024, ECLI: NL:RBAMS:2024:1512' (Fossielvrij v. KLM), www.clientearth.org/media/cx4po41h/klm-judgment-20-march-2024.pdf, (accessed 6 June 2025).

²⁵ClientEarth, 'Ryanair, Delta, Lufthansa, Easyjet among 71 airlines warned over potential greenwashing', 18 July 2024, www.clientearth.org/latest/press-office/press-releases/ryanair-delta-lufthansa-easyjet-among-71-airlines-warned-over-potential-greenwashing/, (accessed 6 June 2025).

²⁶ The Advertising Standards Authority, 'ASA Virgin Atlantic Airways, 7 August 2024, G23-1224417', www.asa.org.uk/rulings/virgin-atlantic-airways-ltd-g23-1224417-virgin-atlantic-airways-ltd.html, (accessed 6 June 2025).

²⁷Forbrugerombudsmanden, 'Forbrugerombudsmanden politianmelder flyselskabet KLM for vildledende udsagn om bæredygtighed', 22 January 2025,

https://forbrugerombudsmanden.dk/nyheder/forbrugerombudsmanden/pressemeddelelser/2025/20250122-forbrugerombudsmanden-politianmelder-flyselskabet-klm-for-vildledende-udsagn-om-baeredygtighed, (accessed 6 June 2025).

²⁸ Brand Equity, 'German court bans Lufthansa's alleged 'greenwashing' ads', Cologne Regional Court, 21 March 2025, 84 O 29/24 (Deutsche Umwelthilfe v. Lufthansa),

https://brandequity.economictimes.indiatimes.com/news/advertising/german-court-bans-lufthansas-alleged-greenwashing-ads/119460084, (accessed 6 June 2025).

flight-related CO2 emissions directly during booking through the use of sustainable aviation fuels (SAF)."²⁹

Denmark, March 2025 (generic green claims): BEUC's Danish member **Forbrugerrådet Tænk** filed a complaint against **SAS** for their "SAS Conscious Traveller" initiative. By taking ten environmentally conscious steps, consumers can obtain the "Conscious Traveler" title which gives them for instance 5,000 bonus points which can be used as a discount on future flights. Forbrugerrådet Tænk believes that this initiative is misleading consumers into believing that small acts such as buying environmentally conscious products in a shop can compensate for the massive CO2 emissions that flying entails.³⁰

Germany, April 2025 (generic green claims): The Berlin Regional Court ruled that statements used by **Air Baltic** in their advertisement was considered misleading, this after a complaint from BEUC's German member **Verbraucherzentrale Bundesverband (vzbv)**. Statements such as "think green, fly green", "opportunity to fly greener" and "green by nature" were used on the airline's website. Because a significant proportion of consumers interprets the term "green" as environmentally friendly and climate-neutral, the use of these terms was seen as misleading. Furthermore, the airline did not substantiate they were 'greener' than any other airline.³¹

Worldwide

International Consumer Protection and Enforcement Network (ICPEN), May 2025 (generic green claims): 17 members of ICPEN issued an open letter to the aviation industry, urging compliance with consumer protection laws when making environmental claims. The letter outlines common principles to help ensure that claims are not misleading, especially regarding carbon offsetting and alternative fuels, and do not give a false impression about the overall environmental impact of flying.³²

New Zealand, February 2024 (climate-related claims): The Christchurch Airport in New Zealand decided to stop using the phrase "climate positive" in its advertising, following a complaint that the claim was misleading. The complaint pointed out that the calculation underpinning the claim excluded carbon emissions from flight to and from the airport, which accounts for 90% of the airport's total climate impact.³³

Australia, October 2024 (net-zero by 2050): The Australian advocacy group Climate Integrity and Environmental Defenders Office filed a complaint against **Qantas Airways** for presenting themselves as a sustainability leader on the path to net zero by 2050, even though their claims are not substantiated.

²⁹ Legal Tribute Online, 'Geldzahlung macht Fliegen nicht automatisch klimaneutral', 24 March 2025, www.lto.de/recht/nachrichten/n/84o2924-lg-koeln-lufthansa-co-2-neutrale-werbung-unzulaessig, (accessed 6 June 2025).

³⁰ Forbrugerrådet Tænk, 'SAS anmeldt for grov greenwashing', https://taenk.dk/presse/sas-anmeldt-grov-greenwashing, (accessed 6 June 2025).

³¹ Vzbv, ,Urteil: Gericht verbietet Air Baltic Werbung für angeblich "grünes" Fliegen', Berlin Regional Court, 18 December 2024, Az. 15 O 437/23, www.vzbv.de/urteile/urteil-gericht-verbietet-air-baltic-werbung-fuer-angeblichgruenes-fliegen, (accessed 6 June 2025).

³² ICPEN, 'ICPEN members write open letter to the aviation sector', 22 May 2025, https://icpen.org/news/1420, (accessed 6 June).

³³ RNZ, 'Christchurch Airport stops saying it is 'climate positive', 13 February 2024, www.rnz.co.nz/news/business/509082/christchurch-airport-stops-saying-it-is-climate-positive, (accessed 6 June 2025).

Singapore, January 2025 (generic green claims): The Advertising Standards Authority of Singapore (ASAS) banned an advertisement from VietJet Air offering a "Green Friday" promotion. Passengers were offered flight tickets marked with the statement "contribute to a greener future". Furthermore, VietJet promoted one of their flights as "modern, fuel-efficient and environmentally friendly", but ASAS' investigation revealed that the environmental benefits claimed were misleading and unclear.³⁴

Results of new evidence-gathering and state of play after 2 years

Since the launch of the complaint to the CPC-Network in June 2023, consumer groups have been monitoring changes made by airlines. BEUC members collected evidence between February and April 2025 by scrutinizing the various booking processes of airlines. This work was complemented by evidence collected by students from Vrije Universiteit Amsterdam between April and May 2025. The results of this evidence-gathering exercise can be found in the <u>Annex</u>.

Overall, while some airlines have made efforts to tone down their climate-related claims, many continue to make misleading green claims, which still fall into five main categories:

Green fares

Airlines sell "green" flights purporting to offset the flight's emissions through contributions to alternative fuels, carbon credits or both. In 2024, it was reported that green fares offered by the Lufthansa Group were well received by passengers and that there is a continuous demand for it. In 2024, approximately 4% of passengers flying with Lufthansa Group were choosing the green fares.³⁵

- For example, Lufthansa Group (except for Eurowings) claim that choosing its Economy Green and Business Green fares cuts flight-related CO2 emissions by 20% through sustainable aviation fuels (SAF) and offsets the remaining 80% via contributions to climate protection projects.
- Interestingly, one of the few modifications made by Lufthansa, Swiss, Brussels Airlines and Austrian Airlines regards colour changes from green to orange or red when choosing Economy Green or Business Green classes.
- It should be noted that, in the case of the Lufthansa Group, the 'green' fare includes extra miles as a reward, which is an incentive for future air travelling that ultimately leads to additional greenhouse gas emissions.

Carbon 'offsetting' services

Airlines offer supplementary services which are claimed to reduce or offset CO2 emissions (but not the non-CO2 warming effects), usually through offset credits. This is now among the most used approaches in the aviation sector to falsely suggest to consumers that the flight has less or no impact because the emissions have been "addressed". Despite a few slight improvements, the practice is still rife:

³⁴ Sustanability Magazine, 'Inside VietJet's Controversial 'Greenwashing' Campaign', 10 January 2025, https://sustainabilitymag.com/articles/the-story-of-vietjets-controversial-greenwashing-campaign, (accessed 6 June).

³⁵ TTGA Asia, 'Lufthansa Group's green fares continue to rise in demand', 21 March 2024, www.ttgasia.com/2024/03/21/lufthansa-groups-green-fares-continue-to-rise-in-demand/, (accessed 6 June 2025). ³⁶ S. Truxal and T. Aras, 'Charting a 'Green' Flight Path for European Consumer?' (2025), EuCML, 1/2025, p. 17.

- Eurowings offer an option called "Your contribution to a more sustainable future" instead of the previous claim "Fly more sustainably".³⁷
- Ryanair no longer offer this option anymore during the booking process.³⁸
- Volotea have replaced the heading "Working Together for Cleaner Travel" into "Working Together Towards a Decarbonized Aviation". While it does no longer offer the option to offset CO2 emissions, it offers passengers the possibility to purchase sustainable aviation fuel (SAF) for €2 and help reduce CO2 emissions.
- TAP still offer passengers to "offset your carbon emissions by supporting certified sustainability project", for example by paying €2,85 per booking.

Contributions to sustainable aviation fuels (SAF)

Airlines often sell passengers a contribution to the costs of alternative fuels, often as a way to 'reduce' or 'offset' the impact of their flights. Examples include:

- Eurowings offer consumers to pay between €14 and €95 under the slogan "Your contributions to a more sustainable future" for a flight between Hamburg and Palma. Passengers can choose between PlanetBlu Light, PlanetBlu Plus and PlanetBlu Pro, reducing by up to 5, 10 or 50% through the use of "sustainable" fuels, as well as offset up to 95, 90 or 50% by contributing to "high-quality" climate conservative projects. When choosing the most expensive option, passengers are offered a hot drink on board. This is a new practice that we did not observe two years ago.
- SAS also still offer to "add biofuel to reduce CO2 emissions", for example by paying €10.
- Air France, Air Baltic and Volotea still give consumers the possibility to contribute to the purchase of SAF.
- KLM has replaced the option "CO2 Impact Programme Reduce your footprint and gain XP" during the booking process to "SAF (alternative aviation fuel) Help reduce our CO2 impact and gain XP", offering to pay an extra €30 for a flight between Amsterdam and Helsinki.
- In 2023, SAS launched tickets with biofuel included. Today, SAS still offers passengers to buy biofuel³⁹. SAS says it will "reduce your CO2 emissions" and passengers will earn 500 SAS bonus points per block bought. However, offering bonus points is problematic because it encourages more flying, which equals more emissions.

Comparing emissions to a benchmark

Airlines claim that emissions from a specific flight are relatively lower than those of a selected benchmark. However, these comparisons are typically only made within the aviation sector and do not include a comparison with lower-emission alternatives such as rail travel. Examples include:

 Air Baltic offers an "emissions calculator" where passengers can calculate how much CO2 a specific trip generates.

³⁷ Read more under point 3.

³⁸ The Irish Times, 'Ryanair quietly drops carbon offset option for passengers on its flights', Ryanair claims there was very little interest or uptake from passengers, www.irishtimes.com/environment/2025/05/25/ryanair-quietly-drops-carbon-offset-option-for-passengers-on-its-flights/, (accessed 6 June 2025).

³⁹ During the booking process: "10,00 EUR equals about 20 minutes of biofueled flight time for one traveller on an average SAS flight" (see <u>Annex</u> p. 70).

- Norwegian and Wizz Air do not use this practice anymore.
- For Norwegian, the booking process no longer contains claims regarding offsetting CO2 emissions nor does it give the option of paying extra to compensate the estimated CO2 emissions. Passengers also no longer have the option to view the CO2 emission calculator during the booking process. However, Norwegian still have general climate-related marketing claims on their website.
- The same goes for Wizz Air which have removed these types of claims but still have a lot of information on their environmental work under the heading "Wizz Cares". Amongst other things, they state "Wizz Air, with one of the youngest aircraft fleets and one of the lowest CO2 emissions per passenger kilometre is already ahead of the industry".

Future goals/net-zero emissions by 2050

Airlines promote their goals of reaching net-zero greenhouse gas emissions. These targets exclude the larger non-CO2 warming effects of aviation – such as nitrogen oxides, soot and water – which represent 66% of the total warming effect of aviation.⁴⁰ Long-term promises are used by many airlines as a way to appeal to environmentally conscious travellers.⁴¹ Examples include:

- Austrian Airlines still claim "a carbon-neutral footprint by 2050" despite scientific evidence suggesting aviation emissions could triple by 2050 even with efficiency improvements.⁴²
- Lufthansa Group, specifically Lufthansa, Swiss and Brussels Airlines also use the same message on their websites.
- Groupe Air France/KLM claim they are committed to achieving net zero CO2 emissions by 2050.
- One of Vueling's sustainability goals are "net-zero emissions by 2050".⁴³
- Finnair say they" need to act to promote achieving net-zero emissions by 2050".44
- Norwegian Air promise 45% less CO2 by 2030. However, this likely refers to emissions per passenger/mile, meaning that total emissions could still rise if flight volume increases.⁴⁵
- Wizz Air commits to further reducing their CO2 emissions by 25% until 2030.⁴⁶

⁴⁰ Aviation also causes significant non-CO2 emissions such as nitrogen oxides, sulphur dioxide, soot and water vapour. Soot and water vapour trigger the formation of contrails, which have a significant warming effect. The total warming effect of aviation is three times that of its CO2 emissions alone. From: www.beuc.eu/sites/default/files/publications/BEUC-X-2023-084_Green_F-Lying_full_report.pdf, (accessed 6 June).

⁴¹ S. Truxal and T Aras, 'Charting a 'Green' Flight Path for European Consumer?' (2025), EuCML, 1/2025, p. 17).

⁴² See p. 11 of the Annex.

 $^{^{43}}$ See p. 43 of the <u>Annex</u>.

⁴⁴ See p. 88 of the <u>Annex</u>.

⁴⁵ See p. 48 of the Annex.

⁴⁶ See p. 96 of the Annex.

Read more

BEUC, Green (F)lying action

The legality of climate-related marketing claims by the aviation sector under EU Directive 2005/29/EC, Dr. C. Kaupa, (study commissioned by BEUC, June 2023)

Launch of a coordinated action by CPC authorities against suspected greenwashing practices by airlines, BEUC and ClientEarth Briefing, (September 2024).

Flying away from greenwashing, BEUC event recording, (September 2024).

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