

Stakeholder Advisory Body

European Aviation Safety Agency

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To: Pekka Henttu, Chairman of EASA Management Board
CC: Luc Tytgat, Strategy & Safety Management Directorate, EASA
Julia Egerer, Strategy Development Officer – Stakeholder Management, EASA
Kai Bauer, Principal Advisor to the SM Director - Environment and Sustainability, EASA

Date: 23rd Sept 2019

SAB/0008

Subject: SAB Comments on the EASA Ecolabel initiative

Dear Pekka,

I am writing in my role as the Chairman of the EASA Stakeholder Advisory Body.

During the Stakeholder Advisory Body meeting on 26th June 2019 Kai Bauer presented the status of EASA's EcoLabel initiative. SAB members also had access to the Management Board presentation on the same topic. SAB members agree with EASA that the environmental impact of aviation is increasingly in the public spotlight, and that the public is not well informed about the changes already made and underway to reduce that environmental impact. The SAB therefore supports the consideration of initiatives for better communication in this area, communication that is both readily available to the general public and easily understood. Having said this, it is the SAB opinion that the scope, nature and timing of the Ecolabel scheme can be enhanced. This letter aims to suggest how the topic could be taken forward as a joint initiative with industry.

Subjects to be further investigated:

1. Clarity of desired outcome

The presentation noted that passengers typically believe that the adverse effects of aviation on the environment are higher than they are, and that the strong track record of the industry in improving the environmental performance of products and services and setting environmental standards is not well known. However, the proposed action of introducing Ecolabels, for an individual aircraft, airline or airport is not likely to address this in itself as it does not provide an overall perspective on the industry's efforts or improvements over time.

An environmental communications scheme could seek to

- Inform the public of the industry's track record and current activities
- Inform passengers of the environmental impact of their actions – for example choosing a particular flight

- Encourage industry to prioritise actions that will most benefit the environment

Defining actions that will achieve any of these outcomes, particularly without unintended consequences, is difficult and would be even more difficult without a clear vision and intent.

Ecolabeling may well be one of several initiatives which together could communicate the efforts and improvements of industry and raise awareness.

2. Potential for misleading or confusing the public with rebound on industry

The proposal is to have 3 ecolabels, one for aircraft performance, one for airline performance and one for airline performance at airport. However, it is proposed that initially only the aircraft performance label is rolled out, and that this could be provided either on the side of the aircraft or on a website, available at the time of booking. The proposal is to use certification data on the label. There are a number of ways that this could be confusing or misleading – a few that spring to mind without extensive consideration are:

- CO₂ data not provided, but CO₂ is the parameter most often used in discussion on environment effects (confusing)
- The aircraft type may be changed between booking and flight, particularly for operational or technical reasons (misleading)
- Environmental impact will vary with different operators even with the same aircraft for a number of reasons, including, for example, the use, or not, of sustainable aviation fuel (misleading).
- The certification data will not represent the environmental performance of that aircraft on that day, but with the proposed analogue scale that would be an obvious assumption. Typically labelling systems on other products use tiered system which would be less prone to this problem (misleading)
- An older aircraft might have poorer environmental certification performance, but that does not necessarily make it a poor environmental choice, taking all factors into consideration. For example, some aircraft have characteristics (capacity, belly cargo capacity, range, etc) which make them optimally suited and effective for specific missions (misleading)
- The intention is to introduce several labels over time. The differences between the labels, and how they could be used may not be clear for passengers (confusing)

Confused passengers, and certainly passengers feeling they have been misled, would be likely to lead to adverse publicity for all involved in aviation, with potential for misguided follow up actions being imposed.

3. Setting up and maintaining an Ecolabel system

The practical difficulties in setting up and managing an Ecolabel system should be anticipated. For example, how would an airline label work on a codeshare route or how would the communication material remain up to date and accurate given there might be aircraft and engines of different modification standards with variation in environmental performance, or the airline might adjust its operational practises or profiles. If there are no readily available measurements that would be appropriate for airlines, how would they be introduced, and their accuracy be checked to the public's satisfaction? The requirement to inform customers would also require changes to

distribution systems and it remains unclear to which customers the information should be made available (for example, what about tickets purchased outside of Europe or on foreign airlines).

4. ICAO certification standards are not designed to serve as a means to rank or label aircraft

ICAO's certification standards have been developed for certification purposes only and have never been agreed or designed as a means to "rank" or "label" aircraft. We are concerned that if there is a potential that future ICAO standards will be used to rank/label aircraft by EASA or any other organization, this will create a new bias in discussions and discourage manufacturers and buyers of aircraft from advocating the adoption of ambitious standards for fear that their aircraft would get a "negative" label. Instead of promoting sustainability, this could have the perverse effect of lowering ambition in future standard making. Of course, some organisations might push for ambitious standards so that their best in class status could be more publicly visible, and in general the standards might drive up overall performance. Overall this issue needs careful consideration.

5. Compatibility of a limited Ecolabel system with a holistic environmental approach

Introducing an Ecolabel for aircraft only initially, may put external pressure on aircraft environmental performance rather than the whole aviation system environmental performance. Aircraft performance is an easy target, because aircraft environmental certification measurements are available. Defining the other proposed ecolabels, taking account of other environmental factors and the contributions of other parts of industry from airlines to ANSPs (since choice a trajectory for a given aeroplane may impact its global emissions), may prove more problematic, as may the circular economy measure. This has the potential for unbalanced environmental communication, leading to unbalanced improvement activity, for years.

6. Regional scope of the initiative

Aviation is a global industry, but the Ecolabel initiative is currently only a European initiative. A patchwork quilt of regulatory initiatives, that might result from different regulators going their own way, would almost certainly lead to additional work for industry and not maximise benefits to the environment. It would probably create confusion, rather than clarity, for the flying public.

7. Engagement with stakeholders

Given the initiative's aim is for wide public communication it is important that there is involvement – or at least the opportunity for involvement – for all stakeholders, including senior management. It is acknowledged that EASA have engaged a number of industry representatives on their Ecolabel task group, have made the SAB aware of the initiative through the presentation that led to this letter, and have stated that there will be further industry consultation. However, the level and scope of the additional stakeholder engagement proposed is not clear, and the timescale for an aircraft ecolabel must be compatible with the high level of stakeholder engagement needed. As well as engagement with individual organisations, and sector trade associations, it is proposed that the Air Transport Action Group (ATAG) is engaged.

8. Proposed timescale for implementation

It is the view of the SAB that the timescales for implementing Ecolabels should give sufficient time to address the various points raised above.

In order to support the flying public with appropriate information on the environmental effects of aviation in a timely manner, whilst addressing the different topics above, it is proposed that EASA significantly extends its stakeholder engagement, both through the SAB structure, and directly through ATAG, given the role ATAG plays on sustainable aviation. Both these approaches would ensure the involvement of industry from outside Europe. Engagement with other regulators, such as the FAA, would also be valuable. The first deliverable from the broader engagement could be a clarification of the objectives of the initiative. This would put the team in a good position to design the communication system in detail, ensuring it is fit for purpose and making sure all options that would achieve the objectives are evaluated, and then define the plan for full and successful implementation, so that even if implementation is in stages the content of each step and the transition between stages is understood from stage 1. Clearly the proposal would benefit from a full consultation.

I hope that you, and the EASA team, find these comments constructive. Industry remains committed to continuously improving the environmental performance of aviation, and of communicating clearly to all on that activity. I look forward to hearing from you on next steps that industry can play in this initiative, and of course I am ready to clarify any points in this letter if needed.

Yours sincerely,



Giancarlo Buono, Chairman – EASA Stakeholder Advisory Body (SAB)