

ERA's response to the EC consultation on CountEmissions EU



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Founded in 1980, European Regions Airline Association (ERA) is a non-profit trade association representing over 55 airlines plus around another 160 companies involved in the European air transport value chain. ERA is the only association that brings together the entire spectrum of companies involved in European aviation. The association supports and defends the airline industry, in particular in its mission of providing safe, efficient, and sustainable air connectivity to all regions of Europe.

ERA welcomes the opportunity to provide a response to the consultation on CountEmissions EU. We are completely in agreement with the goal of promoting a greener transport sector and to better informing passengers about their carbon footprint. We strongly believe that standardising one singular tool is the best solution to address this issue, both for consumers and for airlines. Naturally, any such tool must take into account the industry challenges and must be fair and equal in its method of calculation and implementation. However, we are concerned that the implementation of CountEmissions, as currently envisaged may unfairly disadvantage our members and fail to provide adequate clarity for consumers.

First, the calculation method for the transport industry's greenhouse gas emissions can be misleading and does not enable a comprehensive comparison of the emissions associated with each transport mode. The emissions measurement methodology chosen for CountEmissions is "well to wheel" which includes all emissions related to the production, processing, distribution, and use of fuel, but which ignores the very substantial emissions linked to the construction of transport infrastructure such as highways or railways.

Moreover, the method calculation based on ISO EN14083:2023 standards may be restrictive due to its rigidity and the data required, which are often onerous to calculate and compile. As an association representing the regional aviation industry, many of our members are small and medium sized businesses who do not have the resources to produce the requested data without incurring additional costs at a time when they already have to commit to significant additional investments to finance the green transition.

Our companies are already preparing to implement another tool whose aim is to better inform travellers about transport-related greenhouse gas emissions, namely the EASA Environmental Label. This will be available relatively soon. Our members do not have the bandwidth to manage the implementation of another tool in parallel, and we are concerned that the introduction of multiple tools with the same aim would create confusion for consumers as well as being a burden for companies, something which seems poorly aligned with the Better Regulation philosophy.

ERA would therefore strongly recommend that use of the CountEmissions tool as proposed by the Commission should be optional, avoiding duplication, sparing companies the additional administrative costs, and allowing them to better focus their resources on green investments.

As European airlines, our members are fully committed to the decarbonisation of air transport and to the EU's Fit For 55 agenda, and we have repeatedly reiterated this commitment. Indeed, ERA has been instrumental in developing the Destination 2050 roadmap to chart the European airline industry's course to net zero by 2050. We are nonetheless concerned that the CountEmissions tool, applying only to European airlines, would result in a distortion of competition to the detriment of European carriers. To better level the playing field between regions, it would be more equitable to apply the tool to all carriers serving the European Union, or indeed to target an implementation at global level, for example drawing on ICAO's existing tools.

