

Air France-KLM's Climate Policy Engagement

An InfluenceMap Investor Note

Introduction

The document overviews InfluenceMap's assessment of the EU airline sector, including Air-France-KLM's direct and indirect climate policy engagement. It summarises several [InfluenceMap reports on the aviation sector](#), as well as Air-France KLM's full [company profile](#). The latter can be found live on the InfluenceMap website and contains access to all the underlying scored evidence used for the assessment.

Key points;

- European airlines are some of the most active and negative companies when it comes to engaging with European climate legislation. This negative advocacy is led by legacy airlines, including Air France-KLM, Lufthansa, and International Airlines Group, while low-cost airlines, including easyJet, Ryanair and Wizz Air are increasingly positive on climate policy.
- Air France-KLM is strategically engaged with climate policy for aviation. Air France-KLM has opposed many strands of EU climate policy, including a stringent EU Emissions Trading Scheme, EU jet fuel tax, ticket taxes and a proposed flight cap at Schiphol airport.
- Air France-KLM is a member of Airlines for Europe (A4E) and the International Air Transport Association (IATA), both of which are actively and negatively engaged on EU climate policy.

Engagement with companies over their climate policy engagement is now firmly on the investor agenda on climate change. It is an integral part of the Climate Action 100+ (CA100+) investor-engagement process, which now has over 700 investor signatories with a total of \$68 trillion in assets under management. As a research partner to CA100+, InfluenceMap maintains a global system for tracking, assessing, and scoring companies on their engagement with climate change policy against Paris-aligned benchmarks.

This system currently covers around 500 companies along with 250 of their key industry associations. InfluenceMap refers to the UN's Guide for Responsible Corporate Engagement in Climate Policy as a guide for what constitutes engagement. This can include advertising, social media, public relations, sponsoring research, direct contact with regulators and policymakers, campaign funding and political parties, and participation in policy advisory committees. An explanation of InfluenceMap's methodology [is found here](#).

Overview of Climate Policy Engagement of EU Airlines

This section overviews key EU climate-related policies affecting the airline sector, InfluenceMap's recent reports on the climate policy engagement of EU airlines, and the climate policy engagement of Air France-KLM. InfluenceMap tracks and assesses the engagement of EU airlines with four key policies under the Fit for 55 package.

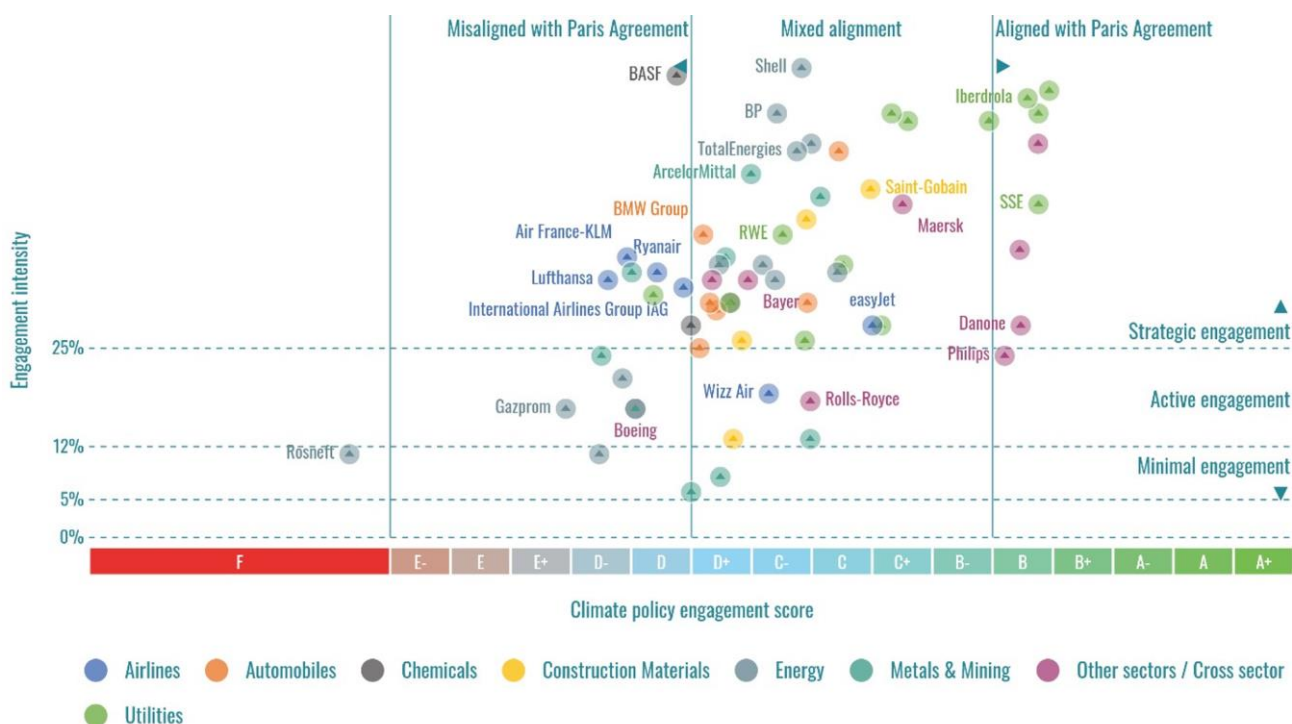
Regulation	Region	Description of Policy
EU Emissions Trading System (EU ETS)	EU	While the EU ETS was originally designed to apply to all flights to and from the EU, since 2012, it has only applied to intra-EEA flights. Limiting the scope to only intra-EEA flights severely limits the scheme's emissions reduction potential. In 2022, the EU Commission and EU Council proposed to maintain an intra-EEA scope while accelerating the phase-out of free EU ETS emissions allowances to 2027. In June 2022 the EU parliament voted to include all flights departing the EEA, phase-out free emissions allowances by 2025, and allocate SAF-based allowances until 2030. The policy passed in April 2023, and maintained the scope to intra-EEA flights until 2027 while free emissions allowances will be phased out by 2026, and 20 million SAF-allowances are to be allocated.
Jet fuel taxation	EU and national	Fossil-based jet fuel is currently exempt from tax in the EU, unlike fossil-based fuel for cars and some rail services. The EU Commission's proposal for the Revision of the Energy Taxation Directive proposed a phase-in of jet fuel tax over 10 years. The draft EU Parliamentary position supported the taxation of jet fuel and advocated for a zero tax rate on sustainable aviation fuels and electricity. However, some EU member states have historically opposed a jet fuel tax, and removing the tax exemption requires unanimity among member states in the Council.
Ticket taxes	National	In the absence of other climate-related regulations or taxes for aviation, many European states have introduced national ticket taxes for flights, citing environmental concerns. A 2019 European Commission study found that only six member states (including the UK) levied ticket taxes on flights averaging EUR11 per ticket, with most European states applying no flight ticket taxes at all. The IEA's 2023 Net Zero Scenario integrates frequent flyer levies to reduce aviation demand equitably. No frequent flyer levies currently exist at the national or regional level. In April 2022 the Belgian Embarkation Tax came into effect. In October 2021, the UK Government decreased domestic Air Passenger Duty while increasing rates for flights over 5,500 miles. The Netherlands proposed an increase to passenger ticket taxes from January 2023, and in September 2023 proposed a tax on transferring passengers . In 2021, Portugal introduced a flight ticket tax .
SAF mandate	EU	The ReFuelEU Aviation Initiative , 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 proposal increased the quotas to 27% by 2040 and 85% by 2050. In June 2022, the EU Council proposed to increase the 2030 target for SAFs from 5% to 6%. The policy passed in September 2023. The agreement increased the ambition of the Commission's mandated targets for SAF, settling on targets of 2% in 2025 and 70% in 2050.

In June 2022, InfluenceMap released its 'Airlines and European Climate Policy' [report](#), which concluded that European airlines remain leading opponents of European climate legislation. The analysis updated InfluenceMap's 2021 'The Aviation Industry and European Climate Policy' [report](#) and drew upon 350 items of evidence of climate policy engagement by the aviation industry since June 2021. The 2022 report identified a growing divide between legacy

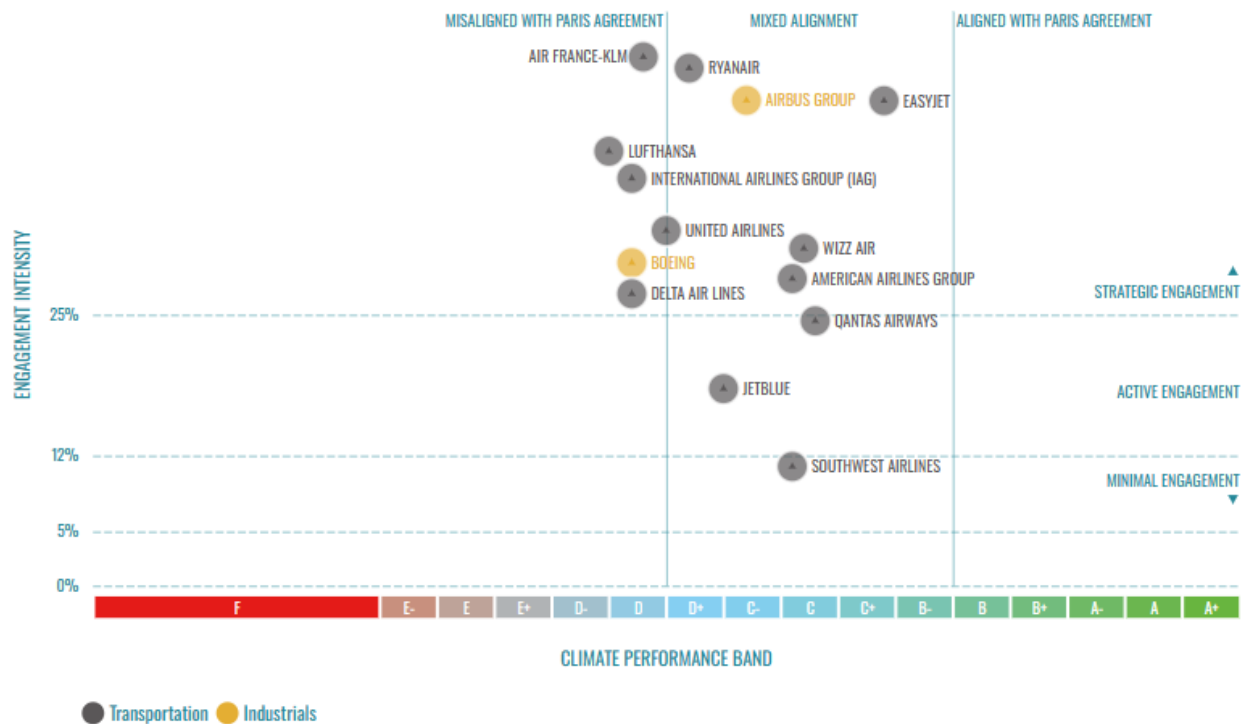
airlines like Air-France KLM, International Airlines Group (IAG), and Lufthansa, leading negative advocacy on European climate regulation, and low-cost airlines - easyJet, Ryanair and Wizz Air - increasingly supportive of applying climate policy to all international flights in the EU. Other key findings from the report are:

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-). The figure below shows that the airline sector (blue) remains clustered on the left-hand side of the graph, with more unified misalignment to the Paris-aligned policy than other analyzed sectors. The second figure shows the November 2023 performance scores of the airlines assessed by InfluenceMap. It shows that Air France-KLM is the most strategically engaged airline, and one of the most negatively engaged airlines.

The European Corporate Climate Policy Engagement Landscape

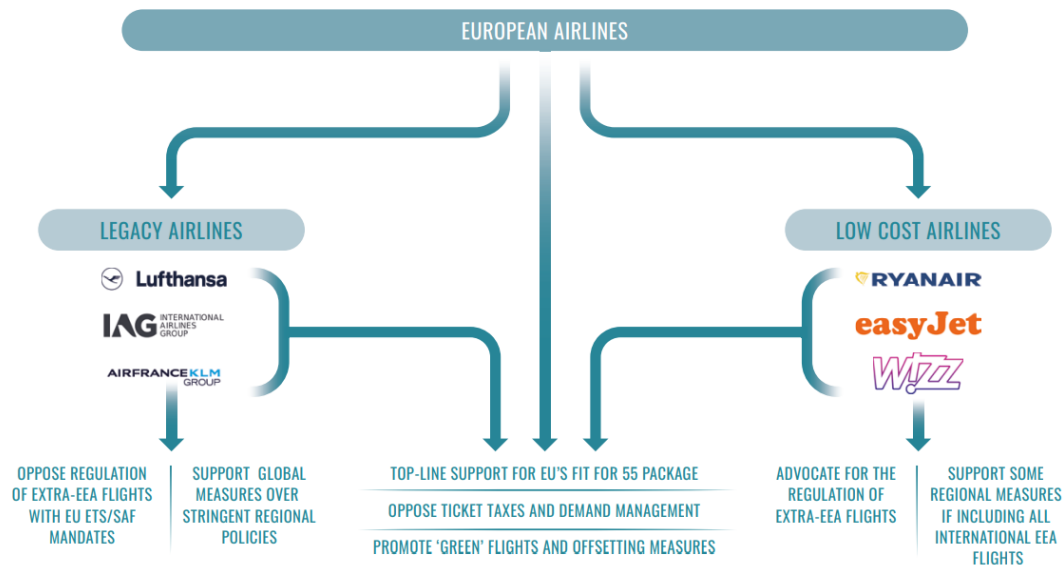


Aviation Companies Climate Policy Engagement Compared



- 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. 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 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. However, the European aviation sector appears to be united in opposition to national ticket taxes and demand management policies.
- 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. 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.

EUROPEAN AIRLINES CLIMATE POLICY STRATEGY EXPLAINED



- InfluenceMap's analysis suggests there are multiple, significant gaps between the aviation industry's communications on climate policy and the conclusions from the IPCC's *Working Group III report*, particularly on the need for demand management policies, and a modal shift from aviation to rail.
- The IPCC's WG III report states: "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).
- 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.

Since the 2022 analysis, InfluenceMap has continued to track and assess the engagement of the aviation industry on key EU climate policies for aviation. The table below outlines Air France-KLM, and its industry associations', engagement with the four policies highlighted above, based on evidence up to November 2023, on a traffic light scale, from red (negative engagement) to green (positive engagement).

Assessment of Air-France KLM and its industry group's positioning on key EU climate rules for aviation					
Entity Name	Performance Band	EU ETS	EU SAF mandate	EU jet fuel tax	Ticket taxes
Air France-KLM	D				
A4E	D				
IATA	D-				

Table Key		
Negative positioning and engagement	Mixed/unclear positioning and engagement	Positive positioning and engagement

Air France-KLM's Direct Engagement (Organization Score)

This section outlines Air France-KLM's direct climate policy engagement on key policies.

Company Name	Performance Band	Organization Score	Relationship Score	Engagement Intensity
<i>Air France-KLM</i>	D	48%	49%	48%

Top-line Messaging on the Fit for 55 package and net-zero CO2 emissions:

Air France-KLM have expressed support for the EU's Fit for 55 package, including in a November 2022 [email](#) to the Executive Vice President of the Green Deal, Frans Timmermans' cabinet. Air France-KLM's 2021 [Sustainability report](#), published in June 2022, also stated support for the EU's Green Deal and a 2050 target for net-zero emissions from EU aviation. However, a January 2022 [position paper](#) appeared to emphasize carbon leakage, competitiveness and connectivity concerns with the Fit for 55 package.

EU Emissions Trading Scheme (EU ETS):

In a January 2021 [EU Consultation Response](#), Air France-KLM appeared to support the replacement of the EU ETS, for both intra-EEA and international flights, by the global Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA). The CORSIA scheme remains voluntary until 2027 and 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 baseline. The response further appeared unsupportive of a reduction in free emissions allowances for aviation. Similarly, in a document entitled 'Key messages' [sent to the EU Commission](#) in March 2021, Air France-KLM appeared unsupportive of a reduction in free EU ETS emissions allowances for aviation, while appearing only to support the EU ETS for emissions "not mitigated by CORSIA". A January 2022 [position paper](#) from Air France-KLM seemed to oppose the application of the EU ETS for international flights, appeared to support a CORSIA-EU ETS hybrid scheme, and supported free allowances until 2030-2035 or through "fair competition allowances", that would likely weaken the stringency of the policy. Additionally, in an April 2021 [presentation to DG Clima](#), Air France-KLM appeared to support continued free emissions allowances for intra-EU flights, allocated based on a carrier's proportion of feeder flights.

Sustainable Aviation Fuel (SAF) mandate:

Air France-KLM's position on a SAF mandate appears to have become increasingly positive. In an April 2021 [presentation to DG Clima](#), Air France-KLM appeared unsupportive of an EU SAF mandate and emphasized risks of fuel tankering. However, a November 2022 [email to Executive Vice President of the Green Deal, Frans Timmermans' cabinet](#) supported an EU SAF mandate. KLM's 2023 [Climate Action Plan](#) supported the EU SAF mandate and disclosed positive lobbying for more stringent criteria for SAF feedstocks. A February 2022 [joint statement](#) positively advocated for higher EU e-kerosene sub-mandates and an earlier start for the sub-mandate.

Jet fuel tax:

In an October 2021 [email to the EU Commission Department DG Move](#), Air France-KLM opposed a kerosene tax, stating it “does not help to make our sector more sustainable”. Similarly, KLM’s former CEO, Pieter Elbers stated in an October 2021 [NRC](#) article that the kerosene tax doesn’t help sustainability but “only costs us money”. Furthermore, the [Aviation Alliance](#), signed by Air France-KLM CEO, Benjamin Smith in January 2022, stated the EU kerosene tax is “not in fact a decarbonizing solution and it would have negative impact on Europe’s air transport sector”. A July 2021 [KLM Press Release](#) further appeared to argue that a kerosene tax could lead airlines to fly longer routes to avoid the tax.

Ticket taxes:

Air France-KLM’s [2021 sustainability report](#), published in July 2022, appeared unsupportive of the French and Dutch ticket taxes. The report further stated that to be an economic player, air transport must rely on an “incentive-based regulatory and fiscal framework”. Air France-KLM’s [2022 CDP response](#) further appeared opposed to national ticket taxes, stating they have “no positive environmental impact”.

Modal shift to rail:

Air France’s [corporate webpage](#), accessed July 2023, appeared to support a low-carbon modal shift from air to low-carbon alternatives for short distances alongside more-efficient flights for longer journeys. KLM CEO, Marjan Rintel, also appeared supportive of a shift to rail for short-haul journeys in a December 2022 [Financial Times article](#). However, in a March 2023 [de Volkskrant](#) article, Rintel appeared not to support a low-carbon modal shift to rail.

Taxonomy:

In its [2021 sustainability report](#), published in July 2022, Air France-KLM appeared to advocate that renewing fleets with new-generation, more efficient aircraft should be recognised as a sustainable activity under the EU Taxonomy, which sets a framework to label ‘green’ activities to guide future investments.

Schiphol airport flight cap:

Air France-KLM has actively and negatively engaged on the Dutch government’s proposed flight cap at Schiphol airport. KLM’s [2023 Climate Action Plan](#) appeared to assert that there are better ways to achieve the targets than cutting capacity and states that “this reduction would limit KLM’s capacity to invest in our transition to a more sustainable airline”. In a September 2023 [press release](#) KLM CEO, Marjan Rintel, appeared to assert that KLM’s own plans can accomplish the targets. Furthermore, Rintel appeared to argue that the measure would encourage airlines to fly larger, polluting aircraft, in a March 2023 [de Volkskrant](#) article, however she stated that KLM would not. In a March 2023 [press release](#), Rintel disclosed that KLM are taking legal action against the Dutch government’s proposal to cap flights from Schiphol airport. The press release argued that the measure violates national, European, and international legislation.

Other engagements to note:

- A December 2022 [Politico](#) article reported that Air France-KLM advocated to weaken France's ban on short haul flights. Similarly an April 2021 [Euractiv](#) article disclosed that the short-haul flight ban was reduced to 2 and a half hours following "strong objections" by Air France-KLM.
- KLM's 2023 [Climate Action Plan](#) disclosed that it had "lobbied to make the CORSIA baseline more ambitious and managed to have ICAO agree to change the benchmark to 85% of the 2019 level".
- KLM's [2022 Annual report](#), published in April 2023, appeared to assert that reducing emissions will be achieved by "continuing to use kerosene in more fuel-efficient aircraft". In a May 2023 [NL Times](#) article, Air France-KLM CEO, Benjamin Smith, reportedly argued that not flying at all is "out of the question", stating that it would be "negative for all our stakeholders; that would not benefit anyone", despite acknowledging that steps must be taken to reduce climate impacts.
- In a July 2022 [statement](#), Air France-KLM appeared to urge increased research on non-CO2 effects before regulation to reduce such effects is enacted.

Indirect Engagement via Industry Associations (Relationship Score)

This section assesses the climate policy engagement of key Air-France KLM industry associations.

Industry Association	Performance Band	Membership
<i>Airlines for Europe</i>	D	Air France-KLM is a member of Airlines for Europe
<i>IATA</i>	D-	The CEO of Air France-KLM, Benjamin Smith, is on the Board of Governors

IATA

Top-line messaging on the Fit for 55 package and net-zero CO2 emissions:

In a June 2023 [Fact Sheet](#) IATA supported net-zero emissions from international aviation by 2050. Similarly, in a January 2023 [Tweet](#), IATA expressed support for the long-term aspirational goal of net-zero emissions from global aviation by 2050, agreed at ICAO. However, in a May 2022 [Blog](#), IATA appeared to oppose measures under the Fit for 55 package, appearing to assert that the package could damage the competitiveness of EU airlines for a “marginal reduction” in CO₂, may increase emissions on some routes, and may undermine the international consensus for climate action forged at ICAO.

EU Emissions Trading Scheme (EU ETS):

In a May 2022 [blog](#), IATA appeared to oppose the application of the EU ETS for aviation, including for intra-EEA flights, stating that “the Commission should propose to implement CORSIA in the EU”. Similarly, an April 2023 [blog](#) appeared to oppose the extension of the EU ETS to international flights, stating it “hijacks” CORSIA and creates potential competitive distortions in the market. A June 2022 [press release](#) also opposed the extension of the EU ETS to international flights, stating it “will threaten the prospects for major global decarbonization efforts” and emphasized competitiveness concerns. A second May 2022 [blog](#) appeared to support the repeal of the EU ETS and its replacement with CORSIA.

Sustainable Aviation Fuel (SAF) mandate:

In a June 2023 [Reuters](#) article, IATA CEO, Willie Walsh, appeared to oppose an EU SAF mandate, stating that the EU is “being anti-aviation”. Similarly, a May 2023 [blog](#) described mandates as an “inefficient” mechanism and appeared to support the US incentive-based approach. A May 2022 [blog](#) appeared unsupportive of extending the EU SAF mandate to international flights and stated a preference for an incentive based approach. A second May 2022 [blog](#) appeared to

oppose the EU SAF mandate and [IATA's January 2022 paper recommending amendments to the ReFuelEU legislation](#) called for the removal of the e-fuel sub-mandate and to limit the scope of the policy to intra-EU flights.

Jet fuel tax:

In a May 2023 [blog](#), IATA urged the tax to be rejected stating it is a “cash-grab on travel”. In a May 2022 [blog](#) IATA further appeared to oppose an EU jet fuel tax and described it as “greenwash”. A December 2021 [blog](#) appeared to assert the tax will not make the industry greener, and in a July 2021 [press release](#), IATA CEO, Willie Walsh, seemed to argue that a kerosene tax siphons money from the industry that could support emissions reduction investments. In a June 2023, [Reuters](#) article, Walsh appeared to oppose an EU jet fuel tax, stating it defies the Chicago Convention.

Ticket taxes:

In a June 2023 [Fact Sheet](#), IATA appeared to oppose ticket taxes for flights, stating that they don't reduce CO₂ emissions and are contrary to international commitments. IATA's September 2022 [working paper presented to ICAO's 41st Assembly](#) also appeared to oppose national ticket taxes. In a March 2022 [Tweet](#), IATA described Belgium's ticket tax as “ineffective greenwash” and IATA's June 2021 [UK public consultation response](#) advocated for the abolishment of the UK's Air Passenger Duty.

Modal shift to rail:

In an August 2023 [Telegraph](#) article, IATA CEO, Willie Walsh, appeared to oppose a low-carbon modal shift to rail, emphasizing environmental concerns with diesel trains and the cost of rail.

Schiphol airport flight cap:

In an August 2023 [press release](#), IATA appeared opposed to the flight cap at Schiphol airport, and stated that it may cause “severe consequences”. In a September 2023 [press release](#), IATA CEO Willie Walsh further stated that IATA would “continue to fight this decision in the Courts”, asserting that by passing this measure, the caretaker government is “hurting the Dutch economy and aviation workers”. A March 2023 [press release](#) disclosed legal action against the Dutch government and IATA's CEO described the measure as a “dangerous precedent”.

Other engagements to note:

- In a June 2023 [Fact Sheet](#), IATA appeared to advocate for a weaker baseline of 85% of 2019-20 emissions under CORSIA, rather than the original, stronger baseline of 100% emissions. A September 2022 [working paper presented to ICAO's 41st Assembly](#) directly advocated to maintain the weakened CORSIA baseline of 2019 emissions until 2035, which would further reduce the ambition of the climate policy.
- IATA argued that France's flight ban is “ineffective from an environmental standpoint” in a January 2023 [Euractiv article](#). First announced in 2019, IATA coordinated the [FlyAware campaign](#) to counter the ‘flight shaming’ movement. An InfluenceMap FOI request from a 2020 International Airlines Group meeting with

the EU Commission revealed that the FlyAware website was developed by IATA to “inform the public on the environmental impact of aviation in a nuanced way, as they see the flygskam movement as potentially damaging and unfair to the sector”. The movement appears to shift the responsibility of GHG emissions reductions to consumers. However, in a September 2022 [‘Airlines’ article](#), IATA appeared to have relaunched the campaign stating it aims to enhance airlines’ understanding of environmental mitigation efforts so that they are better equipped to reach net zero. The original [FlyAware website](#) appears to have been removed. According to the Internet Archive, the page was still online in January 2022.

Airlines For Europe

Top-line messaging on the Fit for 55 package and net-zero CO2 emissions:

In a November 2022 [position paper](#) A4E expressed support for a 2050 net-zero target for the EU aviation sector, and in an October 2022 [press release](#) A4E supported a net-zero emissions goal for international aviation to be achieved at the International Civil Aviation Organization.

EU Emissions Trading System (EU ETS):

In a January 2021 [EU public consultation response](#), A4E appeared to oppose an extension of the EU ETS to international flights and advocated for an EU ETS-CORSIA mix for intra-EU flights. In a June 2021 [meeting](#) between A4E and DG MOVE, obtained by FOI, A4E appeared to support a slower reduction in free emissions allowances. Similarly, a December 2022 [position paper](#) by the association appeared to oppose a 2026 phase out date for free emissions allowances and advocated for an intra-EU scope, and a March 2022 [position paper](#) appeared to advocate for the phase-out of free emissions allowances to be delayed until 2030 and supported an EU ETS-CORSIA hybrid approach for intra-EU flights. Further, a [joint letter](#), signed by A4E in May 2022, supported free emissions allowances based on SAF usage under the EU ETS.

Sustainable Aviation Fuel (SAF) mandate:

In a November 2021 [EU public consultation response](#), A4E supported the SAF mandate and e-fuels sub-mandate, and in June 2023, Destination 2050, of which A4E is a member, released a [press release](#), reconfirming their support for the ReFuelEU Aviation initiative and stating that EU institutions cannot afford to delay decisions on the policy further. However, in a January 2022 [position paper](#), A4E supported an EU SAF mandate with exceptions, stating it should only be introduced in a ‘mature’ market, and a March 2022 [position paper](#) supported an EU SAF mandate while emphasizing cost concerns and stating that it should be introduced with incentives for SAFs.

Jet fuel tax:

A4E’s March 2022 [position paper](#) stated it is “categorically opposed” to ending the tax exemption, asserting that it would lead to more CO₂ emissions. In June 2021 [meeting notes](#) with the EU Commission Department DG MOVE, obtained by FOI, A4E directly advocated against an EU jet fuel tax, stating it would “deprive the sector of resources needed to invest in decarbonisation”. A November 2021 [EU consultation response](#) appeared to oppose an EU kerosene tax, emphasizing

cost concerns and stating it would have a “limited impact” on emissions, and a May 2023 [position paper](#) asserted it would impede decarbonization.

Taxonomy:

A July 2023 [position paper](#) supported the inclusion of aviation in the EU taxonomy as a “transitional activity”.

Modal shift:

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. The March 2022 [press release](#) by ACE, CANSO, ERAA states: “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.” In contrast, the International Energy Agency’s 2022 [Net Zero Roadmap](#) concluded that sustained investment in high-speed rail could shift approximately 70% of flights shorter than 800km by 2050.

Schiphol airport flight cap:

In a July 2023 [Tweet](#), A4E stated that it supports the appeal against the flight cap at Schiphol airport, and a July 2023 [KLM press release](#) disclosed that A4E support the causation proceedings against the judgement of the Amsterdam Court of Appeal on the implementation of the temporary experimentation rule. Additionally, in a September 2023 [CGTN](#) article, A4E Managing Director, Ourania Georgoutsakou, opposed the Netherlands’ flight cap stating it is “arbitrary, ill-thought out and undercuts procedures normally used”.

Other engagements to note:

- In a January 2022 [position paper](#), A4E appeared unsupportive of changing the CORSIA baseline from 2019 emissions to the average emissions of 2019–2020, which would have strengthened the ambition of the policy.
- A4E Acting Managing Director, Laurent Donceel, appeared to oppose France’s short haul flight ban, stating that “instead of pursuing tokenistic bans, governments need to throw their efforts into advancing these real, meaningful solutions” in a May 2023 [New York Times](#) article. In a January 2023 [Euractiv](#) article, A4E Managing Director, Thomas Reyneart, accused politicians of making a “political gesture” with France’s short-haul flight ban, arguing that it would not impact CO₂ emissions. He further argued that governments are greenwashing by implementing such policies.