

EU Aviation Non-CO2 MRV - Safe Landing's Consultation Response

Safe Landing is an international community of aviation workers who care about flying and the planet. We advocate for honest reporting of the full climate impact of our industry. As such, we welcome the introduction of the EU Monitoring, Reporting and Verifying (MRV) framework to mitigate the non-CO₂ effects of aviation.

It is critical though, that the full geographical scope is retained and all flights entering or leaving the European Economic Area (EEA) are included. Long-haul extra-EU flights, particularly those over the North Atlantic, form a significant portion of the globe's contrail-induced warming. In comparison with the short-haul intra-EU flights, these flights are more likely to operate at night time, cruise for longer periods and often at higher altitudes. In the case of flights in the 'North Atlantic Corridor', aircraft fly where the formation of warming contrails is likely to be 2 times higher than the global average. To exclude these flights from the MRV would mean not only a significant missed opportunity, but would also limit the full understanding that could be gained from the MRV.

Targeting the critical areas for warming contrails is vital, otherwise the majority of the flights which contribute to aviation's non-CO₂ warming will not be part of the framework. By having a more complete monitoring, reporting and verification framework, this will help to reduce the uncertainty in the non-CO₂ effects and support work to understand and act as appropriate on aviation climate impacts.

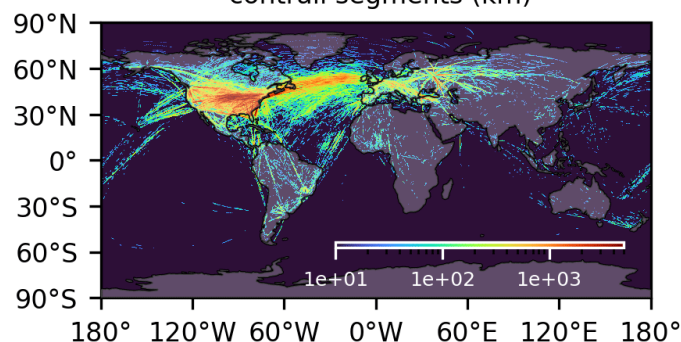
We therefore dismiss the lobbying tactics of [some in our industry](#), and advocate for the EU aviation non-CO2 emissions 'MRV' to remain **full-scope**.

Proposed option: Trans-Atlantic Agreement

Our organisation suggests that the EU should **only** consider exempting extra-EU flights on the precondition that there is first a Trans-Atlantic agreement in place first between North America and Europe to monitor, report and verify non-CO2 emissions/warming. We make this suggestion for the following reasons:

- North America and Europe have a strong pedigree in aviation. They have a history of leading the cutting-edge in aviation research and are home to the majority of leading aerospace companies.
- The populations of N America and Europe fly more than any other continent, they are also relatively wealthy and can thus afford (the relatively low costs) of any measures.
- As a happy coincidence, [most warming contrails occur](#) in the Northern Hemisphere, across North America, Europe, and the North Atlantic:

(a) Location of strongly warming contrail segments (km)



Rather than creating some sort of 'competitive disadvantage' for Europe (or North America), leading the research, development and implementation of non-CO2 measures would be advantageous for the industry, the economy and workers. The expertise gained in terms of technology, processes and other intellectual property could then be exported to the rest of the world. Additional aviation worker jobs would be created in research, development, testing and operations - and this is why we are in favour of as wide a scope as possible.