InfluenceMap

Corporate Capture and the UN International Civil Aviation Organization

How corporate interests influence global climate policy at the UN agency for aviation

October 2022

Table of Contents

It is noted that logos of industry associations and the UN International Civil Aviation Organization are occasionally utilized in the graphics associated with the analysis in this report, as is common practice in public facing releases of this kind. This in no way implies agreement and/or endorsement by the entities concerned with the report's content.

Executive Summary

- This research highlights the limited transparency practices and significant opportunities for industry engagement with climate negotiations at the UN agency for aviation, the International Civil Aviation Organization (ICAO). It demonstrates the aviation industry's likely influence on the direction and development of global climate policy for the sector to date, which appears to remain a key blockage to meaningful action to reduce global aviation emissions.
- As aviation was not explicitly referenced in the United Nations Framework Convention on Climate Change (UNFCCC)'s Paris Agreement, the responsibility for addressing international aviation emissions has since largely remained with *ICAO.* ICAO has prioritized the carbon offsetting scheme - CORSIA - which the UN's climate science body, the *Intergovernmental Panel on Climate Change (IPCC)*, confirmed "does not lead to a reduction in in-sector emissions" from aviation. Consequently, aviation's global CO_2 emissions are *forecast to grow by 190-277%* between 2015-2050.

Table 1: Comparing transparency and industry influence over UN climate negotiations

UN CLIMATE GOVERNANCE BODY	UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)	INTERNATIONAL MARITIME ORGANIZATION (IMO)	INTERNATIONAL CIVIL AVIATION ORGANIZATION (ICAO)
SECTORS COVERED BY UN BODY	ALL SECTORS	SHIPPING	AVIATION
ARE INDUSTRY ASSOCIATIONS EXCLUDED FROM CLIMATE NEGOTIATIONS?	NO	NO	NO
ARE CORPORATIONS EXCLUDED FROM STATE DELEGATIONS DURING CLIMATE NEGOTIATIONS?	NO	NO	NO
ARE DELEGATES PERMITTED TO SHARE CLIMATE NEGOTIATION DETAILS WITH EXTERNAL GROUPS SUCH AS THE MEDIA?	YES	PARTLY	NO
CAN ALL DELEGATES PARTICIPATE IN CLIMATE NEGOTIATIONS WITHOUT SIGNING NON-DISCLOSURE AGREEMENTS?	YES	YES	NO
ARE ALL KEY CLIMATE NEGOTIATION DOCUMENTS AND REPORTS MADE PUBLIC?	YES	PARTLY	NO
ARE ALL CLIMATE POLICY PAPERS FROM STATES & INDUSTRY MADE PUBLIC?	YES	YES	NO
ARE THE MEDIA ABLE TO ATTEND AND FREELY REPORT ON CLIMATE NEGOTIATIONS?	YES	PARTLY	NO
ARE NGOS ALLOWED TO ATTEND KEY CLIMATE NEGOTIATION MEETINGS?	PARTLY	PARTLY	PARTLY
ARE JOB AFFILIATIONS OF CLIMATE NEGOTIATORS DISCLOSED IN DELEGATE LISTS?	YES	YES	NO
% OF DELEGATES REPRESENTING INDUSTRY AT RECENT CLIMATE NEGOTIATIONS	1%	25%	31%

Graph comparing transparency rules and practices and industry influence at ICAO with other key UN climate negotiation bodies: the United Nations Framework Convention on Climate Change (UNFCCC) and International Maritime Organization (IMO).

- Strong transparency and accountability in policy decision making have been highlighted by the *OECD* as necessary for avoiding 'policy capture' by vested interests. This report analyzes the transparency mechanisms at ICAO's key climate negotiation body, the Committee on Aviation Environmental Protection (CAEP), and identifies several practices that are not replicated in other major UN climate negotiation forums. For example, climate negotiators in CAEP are required to sign non-disclosure agreements to participate, and face *"unlimited financial liability"* if they break internal rules. Key climate negotiation documents, including position papers, are not publicly available, and the media is *prohibited* from attending CAEP negotiations.
- The study finds that the aviation industry has had a significant opportunity to influence ICAO climate negotiations, with over 30% of the UN bodies' climate CAEP meeting delegates coming from the aviation or fossil fuel industries since the Paris Agreement. At these meetings, industry outnumbered environmental delegates by more than seven to one, and one industry group, the International Coordinating Council of Aerospace Industries Association (ICCAIA), had more delegates than even the largest state delegation. Only *a single environmental group*, the International Coalition for Sustainable Aviation (ICSA), is permitted to attend CAEP meetings, compared with seven industry groups.
- The aviation industry's efforts to influence global climate policy appear to have been highly successful. For example, the International Air Transport Association (IATA) appears to have first *proposed* a global market-based measure for aviation to achieve carbon neutral growth from 2020, and subsequently helped *develop* ICAO's main climate rule - the CORSIA offsetting scheme. After its adoption, IATA successfully led 2020 advocacy efforts to *weaken* the policy by changing the baseline year, a measure *supported* by ICAO a few months later, using language that appeared to reflect key positions supported by IATA. IATA also appears to have been instrumental in *promoting the CORSIA* scheme to *counter* the development of more stringent climate regulations at national and regional levels.
- An IATA paper in August 2022 appeared to *urge* the upcoming ICAO Assembly to further weaken its climate ambition, including extending a weaker baseline to CORSIA until 2035, likely further reducing CORSIA's longer-term offsetting requirements. The paper also called on ICAO to take a stronger position *against the need for national and regional level policy* on aviation emissions. It is not clear how influential these positions have been, and IATA appears to have *withdrawn* the paper during the ICAO Assembly.
- At the 41st ICAO Assembly member states will have the opportunity to adopt a long term aspirational goal (LTAG) of net zero CO_2 emissions from international aviation by 2050. Industry, led by IATA, has *championed* this goal. This is despite IATA's *broad opposition* to near-term policies that might help achieve this target, and multiple *IATA key members* - including the CEO of Etihad - raising doubts about its feasibility. InfluenceMap's analysis suggests that the global aviation industry has used its support for net-zero in PR campaigns to help *promote* 'sustainable' flying and at the same time distract attention away from policy efforts that would otherwise reduce in-sector aviation emissions, particularly at national and regional levels.

Glossary

CAEP - The Committee on Aviation Environmental Protection (CAEP) is a technical committee at ICAO that develops global aviation climate rules.

CORSIA - The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is an offsetting scheme first agreed upon in 2016 by ICAO, and the primary global climate rule for aviation.

IATA - The International Air Transport Association is an industry association operating at ICAO that represents the global airline industry and 83% of total air traffic.

ICCAIA - The International Coordinating Council of Aerospace Industries Associations is an industry association operating at ICAO that represents global aerospace industry manufacturers.

ICAO - The International Civil Aviation Organization is the United Nations body for aviation where global climate governance for aviation primarily occurs.

ICSA - The International Coalition for Sustainable Aviation (ICSA) is a civil society group operating at ICAO that represents environmental non-governmental organizations.

IMO - The International Maritime Organization is the United Nations body for shipping where global climate governance for shipping primarily occurs.

IPCC - The Intergovernmental Panel on Climate Change is a United Nations body responsible for advancing knowledge on human-induced climate change.

LTAG - A long-term aspirational goal set by ICAO, which would create a non-binding, long-term emissions reduction goal for international aviation emissions.

Policy capture - Defined based on the OECD definition of policy capture as "encompassing any situation where the decisions taken in a policy cycle mainly reflect the interests of a narrow interest group".

Policy Engagement – Defined based on the 2013 UN Global Compact Guide for Responsible Corporate Engagement in Climate Policy to mean a range of activities that inform or influence climate policy, including direct lobbying of policymakers, marketing and advertising, financial contributions, and expert input into policy working groups.

SAFs - Sustainable aviation fuels, which are defined by ICAO as "renewable or waste-derived aviation fuels that meets sustainability criteria".

UNFCCC - The United Nations Framework Convention on Climate Change (UNFCCC) is a UN climate body that oversees the Paris Agreement.

Background

Addressing the Climate Impacts of Aviation

Aviation's climate impacts have risen rapidly over the last two decades, reaching *2.8%* of global CO2 emissions in 2019, with flights over 1,500km generating around *80%* of global aviation emissions. Academic research has shown that this growth in commercial aviation emissions is largely linked to a small proportion of frequent fliers, with just 1% of the world's population responsible for 50% of commercial aviation emissions and only 2-4% of the global population flying internationally in 2018[1].

The impacts of COVID-19 temporarily reversed this growth, as emissions from international aviation fell by *approximately 50%* in 2020 compared to 2019 levels. However, *the International Air Transport Association (IATA) June 2022 Global Outlook Report* forecasted that global aviation demand will return to 2019 levels of *4.5 billion* passengers a year by 2024 and rise to 7.8 billion in 2040, with total air traffic in July 2022 at *74.6% of pre-COVID-19 levels*. In 2022, *Climate Action Tracker* forecast that without significant policy intervention, aviation's CO2 emissions will grow by 190-277% between 2015-2050. Aviation's warming impact is likely to be exacerbated by non-CO2 impacts, which the *Intergovernmental Panel on Climate Change (IPCC) AR6 WG3 report* estimated may contribute 66% of its overall impact, while noting such warming effects remain uncertain (10-59, 20-24).

The 2022 *IPCC AR6 WG3* report describes aviation as a "hard-to-decarbonize" sector due to its dependency on fossil fuels (10-58, 12-14), with decarbonization reliant on technologies including hydrogen, biofuels, and synthetic fuels (10-5, 14-45). It noted that liquid hydrogen may be feasible to decarbonize short and medium-haul flights (10-61-62, 34-5) while only small planes of up to 50 passengers, accounting for less than 12% of aviation's current CO2 emissions, could likely be electrified (10-60, 23-27). Biofuels and synthetic fuels are also described as "viable options" for decarbonizing aviation (10-5 14-16). Bio-based fuels were found to achieve 2-70% emissions reductions (10-61, 4-6), while the IPPC notes concern around their impacts on biodiversity, food availability and water resources (10-60-61, 18-4) and high costs, at 3 times the price of kerosene (10-61, 13-15). While synthetic fuels produced using low-carbon electricity overcome the land and water issues of biofuels (10-61, 27-33), they are limited by low-carbon energy supply and high costs at 4 to 6 times the price of kerosene (10-61, 30-33).

About this Report

This report analyses the extent to which industry influence has impacted global policy progress on climate for aviation at the UN by analyzing ICAO's climate governance and transparency practices, the level of industry representation, and industry engagement with aviation climate policy.

In August 2021, the UN climate science body, the IPCC released its report '*Climate change 2021: the Physical Science Basis*'. UN Secretary-General António Guterres described the findings as *"a code red for humanity."* Following this the IPCC *AR6 WG3 Report* in 2022 highlighted how ambitious government policy is crucial to reaching net zero emissions, yet "big gaps remain in policy coverage, and the stringency of many policies falls short of what is needed to achieve strong mitigation outcomes" (Technical Summary-109, 19-24).

1 *S. Gössling, A. Humpe, The global scale, distribution and growth of aviation: Implications for climate change, Global Environmental Change, 2020, Vol 65*

International recognition of the role lobbying has played in blocking and delaying climate policy is rapidly growing. The IPCC's *AR6 WG3 report* identified "opposition from status quo interests" (TS-11) and "incumbent" fossil fuel interests "exerting political influence" over the policymaking process as a key reason for the lack of progress on climate policy globally (13-32-33, 38-15). Furthermore, the 2021 OECD report *Lobbying in the 21st Century: Transparency, Integrity and Access*, highlighted that "lobbying by companies in the fossil fuel value chain [...] has been a key contributing factor in blocking action by governments globally to implement regulations on climate change, in line with the 2015 Paris Agreement."

A *2017 OECD study* on regulatory capture further found that transparency in policymaking correlates with the level of perceived undue influence at an institution. InfluenceMap's *2017 'Corporate Capture of the International Maritime Organization [IMO]'* report on ICAO's 'sister' UN agency, the IMO, highlighted how weak transparency and regulatory rules and processes enabled significant industry influence over global climate policy for shipping. It found that 31% of states were represented directly by corporate interests at recent climate negotiations and identified highly negative climate policy engagement from key shipping industry associations. In a follow-up report, *Transparency International* found "governance flaws" within the IMO, including the "disproportionate influence of industry, and lack of delegate accountability."

Using a similar methodology to assess ICAO, this report finds that the aviation industry has lobbied to stall meaningful action to reduce the sector's direct emissions, and that many industry positions have been reflected in ICAO decision-making. This is likely aided by weak transparency and climate governance rules and practices at ICAO that may promote undue influence. As a consequence, there has been very little meaningful action at global, regional, and national levels to address international aviation emissions.

Methodology Summarized

This analysis highlights how the aviation industry has influenced global climate rules for aviation at the UN aviation agency ICAO. The report presents and compares two key analyses which are detailed below.

- Governance and Transparency on Climate at ICAO: The first section analyzes transparency rules and practices over climate governance at ICAO. To achieve this, it studies publicly-available UN documents and external reports and articles from reputable media, and academic and civil society organizations to contrast the rules and practices around transparency and industry influence at ICAO with two other key UN global climate governance forums, the UNFCCC and International Maritime Organization (IMO)
- Industry representation at ICAO: The second section analyzes the representation of industry at key ICAO climate committee meetings. To understand industry representation at ICAO, publicly available delegate lists from ICAO climate meetings since the Paris Agreement have been analyzed, with manual searches on google and social media platforms conducted to find official job titles and affiliations of state delegates.
- Climate Policy and Industry at ICAO: The final section assesses the real-world influence of the aviation industry over climate rules at ICAO. It utilizes InfluenceMap's world-leading platform tracking and scoring companies and industry associations on their climate policy engagement, a platform that has been operational since 2015. Alongside studying the climate policy engagement of key industry entities, the section further analyzes key PR campaigns and high-level messaging from the aviation industry, linking such narratives to their real-world policy engagement.

This report uses the broad *OECD definition of policy capture* as "encompassing any situation where the decisions taken in a policy cycle mainly reflect the interests of a narrow interest group" as a foundation for the analysis. More broadly, this report relies on InfluenceMap's recognized *process for scoring and ranking companies* and industry associations on their activities influencing climate change policy. Using this methodology, InfluenceMap's platform assesses over 400 of the largest companies globally, along with over 200 industry associations that represent these companies in climate policy debates. Listed below are some of its key features and resulting outputs:

- InfluenceMap's system adheres to key features of sound corporate assessment metrics: objectivity, transparency, ease of comprehension, and includes like-for-like comparisons across and within sectors.
- InfluenceMap's system does not judge climate policy itself but instead measures corporate positions against Paris Agreement-aligned benchmarks of government policy, and Science-Based Policy benchmarks based on IPCC statements.
- InfluenceMap defines "policy engagement" based on the *UN Guide for Responsible Corporate Engagement in Climate Policy (2013)*, which defines a range of corporate activities as engagement, such as advertising, social media, public relations, and direct contact with regulators and elected officials.
- InfluenceMap relies on numerous publicly accessible data sources that are reliable representations of corporate policy engagement. These include organizational websites, senior management statements, regulatory consultation comments, financial disclosures, and reports from reliable media outlets.
- Although the system does not require the cooperation of the organizations being assessed, InfluenceMap has engaged with over 100 large corporations, industry associations, and other stakeholders on our methodology and results.

InfluenceMap's system is updated continuously as new information becomes available, which is assessed and added to the InfluenceMap.org database. These results are freely available and in the public domain. The results are provided in the form of metrics and analysis on individual organizations, alongside in company tables produced by *Climate Action 100+* (a globally leading investor initiative, which incorporates InfluenceMap's assessments on climate policy engagement, to benchmark the world's largest corporate GHG emitters on their net-zero transition). A company's relationships with industry associations can be viewed on InfluenceMap's company profiles.

Governance and Transparency on Climate at ICAO

Aviation Climate Governance

Background

The 1997 Kyoto Protocol, the first binding UN climate agreement, excluded international aviation emissions from its rules, instead designating International Civil Aviation Organization (ICAO) to govern greenhouse gas emissions reductions for the sector. Since then, global climate governance for aviation has primarily occurred at the ICAO, rather than through the United Nations Framework Convention on Climate Change (UNFCCC) which oversees the Paris Agreement. The Paris Agreement does not explicitly refer to domestic or international aviation emissions, with the responsibility for action on international aviation emissions assumed to remain with ICAO[2]. However, states like the UK have recently begun to *include international aviation emissions* in their national emission reduction plans under the Paris Agreement for the first time, with the *IPCC's AR6 WG3 report* noting that "some literature suggests that explicitly including international shipping and aviation under the governance of the Paris Agreement could spur stronger decarbonization efforts in these segments" (10-6, 6-14).

Decision-making on Climate at ICAO

The three primary decision-making bodies at ICAO on climate are the Committee on Aviation Environmental Protection (CAEP), the ICAO Council, and the ICAO Assembly. CAEP is a technical committee that develops global aviation climate rules, with meetings occurring once *every three years*, consisting of *31 member states and 9 non-governmental observer organizations*. CAEP "holds its deliberations under a confidentiality agreement and results are only made public when approved by the ICAO Council"[3]. Multiple working groups operate within CAEP, including the 'Emissions' and 'Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)' working groups. CAEP assists the ICAO Council, *consisting of 36 member states,* on climate, with the Council *reviewing and adopting* CAEP recommendations, which meets three times per year[4]. In turn,

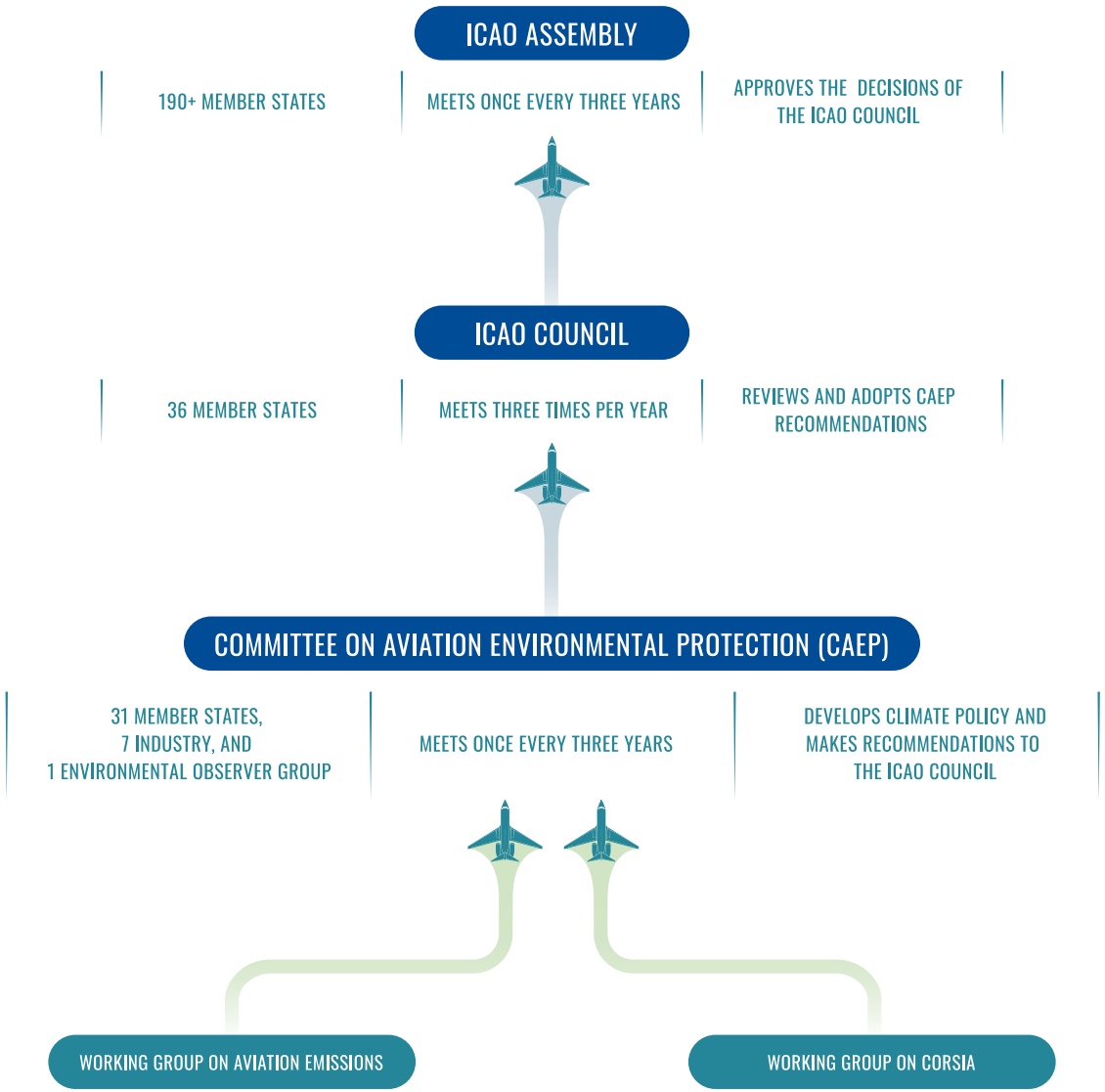
This chapter analyzes transparency rules and industry representation over climate governance at ICAO. It finds that ICAO has significantly weaker transparency practices and higher levels of industry influence than other key UN climate governance institutions.

2 *D. S. Lee, International aviation and the Paris Agreement temperature goals, December 2018, Department of Transport, pg. 6*

3 *U. Ziegler, R. Dupont, T. K. Han, ICAO Committee on Aviation Environmental Protection, ICAO Envionrmental Report, 2022*

4 *UN Joint Inspection Unit, Review of Management and Administration In the International Civil Aviation Organization, 2019, p. 7*

Diagram 1: Key Climate Decision-Making Bodies At ICAO



the Council reports to the ICAO Assembly, the ultimate decision-making authority, which is made up of all *190+ member states* and meets once every three years to approve ICAO Council decisions and to *elect* the Member States *represented on the Council*.

There is some ambiguity around ICAO's ability to set and implement policy to reduce aviation's climate-impacting emissions. ICAO's website explains that through ICAO states *establish* global climate rules for the international aviation sector, governing international flights between states. Yet elsewhere on its website, ICAO claims that it is *"not a global regulator"*, noting that "contrary to many dramatic and media portrayals of UN agencies, they do not have any authority over national governments in the areas of international priority they are established for. Critiques of the UN are often rooted in allegations founded on fantastical capabilities and authorities which sovereign states would never assign to a multilateral organization." Despite this, ICAO appears to repeatedly reassert it has the primary authority to govern aviation's international emissions externally, for example noting in a *COP26 UNFCCC submission* paper that "CO_2 emissions from international aviation are addressed through ICAO and not covered by the Nationally Determined Contributions (NDCs) under the Paris Agreement."

Criticism

ICAO has faced criticism for its failure to introduce Paris-aligned climate rules for aviation by scientific other UN bodies. The *2022 IPCC AR6 report* notes regarding ICAO, "that new accountability and governance structures will be needed to support decarbonization of the aviation sector" (10-67, 27-28) suggesting a greater future role for nation states and the UNFCCC in decarbonizing aviation. An independent scientific analysis, updated in May 2022 by Climate Action Tracker (CAT) found that ICAO's aviation climate strategy overall is *"critically insufficient"* in meeting Paris Agreement goals, with aviation's fair share of GHG emissions leading to a higher than 4°C world. A September 2022 International Energy Agency analysis also found that aviation is *"not on track"* to meet a net-zero emissions pathway under current ICAO rules.

Before COP26 in 2021, the UN Secretary-General Antonio Guterres *publicly criticized* ICAO's climate strategy, stating that "while member states have made some initial steps through the International Civil Aviation Organization and the International Maritime Organization to address emissions from shipping and aviation, current commitments are not aligned with the 1.5-degree goal of the Paris Agreement. In fact, they are more consistent with warming way above 3 degrees", urging the aviation sector to commit to emissions per passenger reductions of 65% by 2050.

Transparency at ICAO

This section analyzes ICAO's transparency practices in climate governance, comparing similar practices at key UN climate governance bodies - the UNFCCC and International Maritime Organization (IMO).

The Committee on Aviation Environmental Protection (CAEP)

CAEP environmental committee meetings are not open to the public or the media. Moreover, key CAEP meeting documents such as agendas and full meeting summaries, some official negotiating documents, and all position papers from member states and observer organizations (including industry) are *not publicly released*. In contrast, at the *IMO* and *UNFCCC*, key meeting documents such as position papers from states and industries are publicly available even before meetings take place. While at the IMO position papers from states and industry are available after key climate meetings, before such meetings not all submissions appear to be publicly available and delegates are unable to share them externally[5]. Unlike with key IMO and UNFCCC climate committees, publicly available delegate lists for CAEP do not disclose participating delegates' current employment or affiliations.

Some key ICAO policy documents that are disclosed also require hundreds of dollars for purchasing. For example, accessing the 2019 CAEP report on the ICAO website is priced at *$428*, while a document explaining the CORSIA offsetting document costs *$95*. This appears to create a price barrier for the media and researchers studying ICAO policymaking.

5 *Hayer, S, Decision-making processes of ICAO and IMO in respect of environmental regulations, Directorate-General for Internal Policies of the Union, European Parliament, 2017, p.22-23*

The ICAO Council and Assembly

At ICAO, the Council appears more transparent, with the agenda of Council meetings published beforehand and post-Council decision papers *published* summarizing country positions on working papers. However, like at CAEP, Council working papers, such as industry position papers, are not automatically disclosed. In addition, civil society groups are *not typically invited* to observe ICAO Council meetings, unlike industry groups. In contrast, the UNFCCC allows industry and civil society groups with "observer" status to attend non-closed COP committee meetings. Any NGO can acquire approval to attend UNFCCC meetings, with all meeting information and submitted documents publicly available online, and NGOs are only excluded from negotiations at the end of sessions[6]. At the ICAO Assembly, some working papers (indicating member state positions) are made publicly available, with the media typically permitted to attend the ICAO Assembly, but not ICAO Council or CAEP meetings[7]. Additionally, while NGOs at the IMO have access to key climate meetings, a *2020 media report* suggests they had been excluded from some more informal recent private meetings on climate.

Non-disclosure Agreements

Many delegates at CAEP negotiations (including civil society groups) are required to sign a non-disclosure agreement to participate, as CAEP "holds its deliberations under a confidentiality agreement"[8]. This non-disclosure agreement prohibits delegates from sharing any documents or disseminating non-public information about CAEP negotiations to external parties including member states, the media, and civil society, with delegates exposed to *unlimited financial liability* if found to break these conditions. Requiring delegates during climate negotiations to sign non-disclosure agreements is *not followed* at either the UNFCCC or IMO.

Media and Communications

CAEP meetings are not open to the media, with the media unable to *attend CAEP committees or working group negotiations*. Delegates are also restricted from sharing negotiation documents and state and industry positions with the media and external government officials due to *non-disclosure agreements.* In contrast, the media is accredited to attend open climate committee meetings at the *UNFCCC*, such as at COP26. At the International Maritime Organization, the media is *accredited to attend* climate negotiation committee meetings, but not working group discussions, with *new 2019 rules* permitting journalists to also quote delegations during IMO meetings with some restrictions.

ICAO's secretariat also appears to push back against external criticism on climate. Media reports have highlighted that ICAO's official Twitter account has *blocked numerous journalists and climate scientists on social media* for spreading "fake news" over aviation's climate impacts. For example, Kevin Anderson, a UK-based climate scientist, stated he *was blocked on Twitter by ICAO* in 2019, as *previously reported*. Following this, ICAO *posted a poem* to Twitter criticizing #fake news and in 2020 ICAO continued to criticize environmental NGOs such as the *World Resources Institute,* which highlighted ICAO's record on climate change.

Criticism

ICAO has faced recent criticism from civil society, journalists and key ICAO member states over being an outlier in the UN climate system for its low transparency levels. In 2019, a Transparency International *spokesperson noted* regarding ICAO that "Agencies which set common global standards for large,

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6 *Hayer, S, Decision-making processes of ICAO and IMO in respect of environmental regulations, Directorate-General for Internal Policies of the Union, European Parliament, 2017, p.36*

7 *Hayer, S, Decision-making processes of ICAO and IMO in respect of environmental regulations, Directorate-General for Internal Policies of the Union, European Parliament, 2017, p.36*

8 *U. Ziegler, R. Dupont, T. K. Han, ICAO Committee on Aviation Environmental Protection, ICAO Envionrmental Report, 2022*

international industries have to be transparent in order to prevent capture by corporate interests, or even the appearance of undue influence", noting that "ICAO currently meets behind closed doors, including for discussion about emissions, which affect the entire planet. We've seen similar situations at other UN agencies ... we strongly believe that all UN bodies need to commit to transparent ways of working in order to gain the public's trust." Similarly, a *Centre for Aviation 2021 report* noted that "apart, arguably, from its triennial Assembly sessions, ICAO essentially works behind closed doors in its decision-making processes."

Broadly, ICAO's weak transparency practices may stop delegates from openly engaging with the media, civil society, and governments around ICAO climate negotiations, preventing the public from being accurately informed of negotiation decisions, outcomes, and the degree of industry influence over climate policy decisions. The private withholding of key climate documents may obscure the data behind technically complex climate decisions, and what final decisions are, establishing barriers to the influence scientific research can have on measures to address aviation's climate impacts. Weak transparency provide cover for industry to unduly influence climate negotiations, reducing public legitimacy over ICAO's climate governance process. In short, the limited transparency at ICAO appears to reflect key conditions that the OECD has highlighted[9] as presenting a significant risk of corporate capture over policy processes.

Following such criticism, in advance of the February 2022 CAEP meeting, the United States pledged to make its ICAO position papers *publicly available*, urging other countries to do the same. The US paper stated that CAEP "should seek to increase the transparency of its decision-making processes to improve its accountability to the public it seeks to serve". However, industry representatives appear to support lower transparency levels suggesting ICAO's practices benefit industry advocacy. In 2019, an *IATA spokesperson stated* that "we do not believe it is necessary for all information and CAEP working papers to be made public, but we agree that the availability of final reports and recommendations is important. [...] If the information used in CAEP work was not protected by a non-disclosure agreement, stakeholders would be much more reluctant to share such information and the quality of CAEP's work would suffer from it."

Industry Participation at ICAO, IMO & UNFCCC

Following concerns around corporate capture, some UN agencies have introduced or are considering rules to limit corporate influence during negotiations. For example, in 2003 the World Health Organization (WHO) agreed to *exclude tobacco industry groups* from the policymaking process due to their historical obstruction of tobacco control legislation, leaving the industry *not represented on related WHO committees*, and unable to submit policy papers. In 2016 it also agreed on the *"Framework for Engagement with Non-State Actors"*, setting out rules of conduct to prevent undue influence from external interests.

Like at the UNFCCC and IMO, ICAO does not appear to impose formal institutional rules regulating corporate lobbying and influence or industry's inclusion in member state delegations. However, the IMO recently introduced *limited reforms* to improve its transparency and reduce industry influence. Similarly, the UNFCCC has recently *discussed introducing a "conflict of interest" policy* to limit fossil-fuel capture, such as at *COP26*, yet negotiations *appear to have stalled*.

A summary comparing rules over climate policymaking between the three UN institutions follows.

9 *OECD, Preventing Policy Capture: Integrity in Public Decision Making, OECD Public Governance Reviews, OECD Publishing, Paris, 2017*

Table 2: Comparing transparency and industry influence over UN climate negotiations

UN CLIMATE GOVERNANCE BODY	UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE (UNFCCC)	INTERNATIONAL MARITIME ORGANIZATION (IMO)	INTERNATIONAL CIVIL AVIATION ORGANIZATION (ICAO)
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ARE CORPORATIONS EXCLUDED FROM STATE DELEGATIONS DURING CLIMATE NEGOTIATIONS?	NO	NO	NO
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CAN ALL DELEGATES PARTICIPATE IN CLIMATE NEGOTIATIONS WITHOUT SIGNING NON-DISCLOSURE AGREEMENTS?	YES	YES	NO
ARE ALL KEY CLIMATE NEGOTIATION DOCUMENTS AND REPORTS MADE PUBLIC?	YES	PARTLY	NO
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Graph comparing transparency rules and practices and industry influence at ICAO with other key UN climate negotiation bodies: the United Nations Framework Convention on Climate Change (UNFCCC) and International Maritime Organization (IMO).

Industry Representation at ICAO

Corporations participate in ICAO environmental negotiations both as part of industry associations and as formal members of state delegations. InfluenceMap has analyzed delegate lists for the last three CAEP meetings since the Paris Agreement[10] and found that out of over 850 attending delegates, 31% directly represented corporate interests, compared to 4% representing environmental NGOs[11]. Overall, industry representatives outnumber civil society delegates by more than seven to one at ICAO climate negotiations. Only *a single environment group*, the International Coalition for Sustainable Aviation (ICSA), is permitted to attend ICAO environmental meetings, compared to seven industry organizations. In contrast, *hundreds of environmental NGOs are granted observer status at UNFCCC* climate negotiations, while *5+ environmental NGOs* have been granted "consultative" status with the IMO.

10 *CAEP/10 in 2016, CAEP/11 In 2019 and CAEP/12 in 2022. CAEP/12 was held virtually in 2022, due to the COVID-19 pandemic, with attendance significantly higher than other recent in-person CAEP negotiations.*

11 *Note: state delegates include 'observer' states and overall calculations exclude ICAO secretariat delegates.*

Table 3: Industry delegates at ICAO climate negotiations since the Paris Agreement

TYPE OF DELEGATE	CAEP/12 (2022)	CAEP/11 (2019)	CAEP/10 (2016)	% OF ALL DELEGATES POST-PARIS CAEP MEETINGS OVERALL
CORPORATE REPRESENTATIVES IN INDUSTRY ASSOCIATION DELEGATIONS	25%	30%	34%	28%
CORPORATE REPRESENTATIVES IN STATE DELEGATIONS [1]	4%	2%	0% [2]	3%
COMBINED INDUSTRY DELEGATES	29%	32%	34%	31%
ENVIRONMENTAL NGO DELEGATES	3%	4%	6%	4%

1 *Based on manual searching of delegate names as ICAO does not disclose direct affiliations of delegates at CAEP*

2 *N/A as full delegate names from CAEP/10 not disclosed, figure therefore likely to be an underestimate*

Amongst the industry groups that attend ICAO meetings, the International Coordinating Council of Aerospace Industries Associations (ICCAIA), representing global aerospace manufacturers, has the largest attending delegation, which is greater than any state delegations at all three CAEP meetings since the Paris Agreement.

Through manual social media and search engine analysis, InfluenceMap has identified over 20 state delegates that appear to have been employed by the aviation or fossil fuel industries. This includes airlines such as Emirates, Etihad, and Japan Airlines, aerospace companies like Safran, and oil companies such as Saudi Aramco, with the majority of Saudi Arabia's 2022 CAEP delegation appearing to work for Saudi Aramco, according to LinkedIn records.

At the UNFCCC's COP26 negotiations in 2021, an analysis by *UK-based NGO Global Witness* found that there were 503 attending delegates representing industry interests associated with the fossil fuel value chain. However, this represents around just 1% of all the 30,000+ provisional delegates participating at COP26, excluding media and UN secretariat officials. In comparison, around 25% of delegates at a 2021 IMO climate negotiation meeting represented industry, according to a previous *New York Times & InfluenceMap analysis*, while 31% of delegates at post-Paris ICAO negotiations represented industry, the highest proportion of all three UN bodies.

A larger number of industry delegates at CAEP meetings were also directly employed by industry associations (28%) compared to identified industry figures in state delegations (3%). This suggests corporate influence over the development of ICAO climate policy is primarily exerted from within such associations. However, InfluenceMap analysis also finds that some industry delegates have represented both states and industry associations at recent CAEP meetings.

Climate Policy and Industry Influence at ICAO

How the Aviation Industry has Sought to Influence Global Climate Policy

To help assess industry influence at ICAO, InfluenceMap has analyzed the climate policy engagement of 2 key industry associations and 9 aviation sector companies globally and at ICAO. These are the International Air Transport Association, representing the global airline industry and the International Coordinating Council of Aerospace Industries, representing the aerospace industries & manufacturers. Alongside these, InfluenceMap has assessed the climate policy engagement of the world's largest five airlines based on *January 2020 revenue* (Delta Air Lines, American Airlines Group, Lufthansa, United Airlines Holdings, and Air France-KLM), the *Climate Action 100+ focus company* Qantas Airways, the former airline group IATA Director-General, Willie Walsh, was CEO of, International Airlines Group (IAG), and the world's two primary plane manufacturers (Airbus and Boeing).

To assess which corporations and industry associations are the most influential on climate issues, InfluenceMap's method produces four metrics:

- The **Organization Score** (0-100) expresses how supportive or obstructive the organization is towards climate policy aligned with the Paris Agreement, with 100 being fully supportive and 0 being fully opposed.
- The **Engagement Intensity** (0-100) expresses this activity's intensity, whether positive or negative.
- The **Relationship Score** (0-100) expresses how supportive or obstructive the company's industry associations are towards climate policy aligned with the Paris Agreement, with 0 being fully opposed and 100 being fully supportive (aggregated).
- The **Performance Band** expresses a full measure of a company's climate policy engagement, including both its own and its industry groups' activity on an A+ through to F scale (A = support, F = opposition).

This chapter analyses first summarizes the global climate policy engagement of key industry groups and aerospace companies. Subsequently, the chapter highlights corporate engagement with three key global climate policies for aviation negotiated at ICAO, primarily in the Committee on Aviation Environmental Protection (CAEP).

Overall, this assessment finds that in 2021-22, while airlines and aircraft manufacturers have widely stated top-line support for a net-zero 2050 CO_2 emissions target, the sector appears to oppose specific near-term policies to align aviation with a 2050 net-zero target. Performance scores for the assessed industry associations and companies averaged D, indicating negative to mixed climate engagement with policy aligned with the Paris Agreement, with all scoring a C or below.

Of the industry associations and airlines analyzed, *IATA (D-)* has the most active, and most negative, engagement with climate-related policy, opposing key climate policies for aviation at global, regional (EU), and national (UK) levels. In contrast, the entities with the least engagement scored between C and C-, including *Qantas (C-)* and *ICCAIA (C)*, indicating mixed climate engagement policy. However, due to these entities' low disclosure on key climate policy positions, these scores can be predominantly attributed to positive top-line statements on a net-zero 2050 goal, rather than engagements on specific climate-related regulations. This global analysis also found that the two international industry associations assessed appear to take the lead on engaging with ICAO's climate rules, while individual airlines are primarily directly engaged with national and regional-level climate regulations.

Table 4: Global Climate Policy Engagement Scores for Aviation Companies and Industry Associations

Industry Association	Engagement intensity		Organization score	Performance Band
International Air Transport Association (IATA)	45%		40%	D-
International Coordinating Council of Aerospace Industries Associations (ICCAIA)	13%		63%	C
Airline	**Engagement intensity**	**Relationship score**	**Organization score**	**Performance Band**
Air France-KLM	40%	47%	45%	D
International Airlines Group (IAG)	34%	42%	50%	D
Lufthansa	34%	44%	43%	D-
Delta Air Lines	19%	36%	50%	D
United Airlines	22%	36%	58%	D+
Qantas Airways	8%	53%	58%	C-
American Airlines Group	20%	41%	61%	C-
Aircraft Manufacturer	**Engagement intensity**	**Relationship score**	**Organization score**	**Performance band**
Airbus	34%	52%	58%	C-
Boeing	19%	40%	48%	D

Corporate and Industry Climate Policy Engagement at ICAO

CORSIA

The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is an offsetting scheme *first agreed upon in 2016* by ICAO. CORSIA, a market-based mechanism, requires airlines to purchase offsets or deploy lower-carbon fuels to compensate for aviation GHG emissions above a 2019 baseline. It does not reduce absolute emissions from aviation as the program is primarily focused on offsetting. The policy remains *voluntary* for all member states until 2027 and *does not account* for aviation's non-CO_2 climate effects. Transparency concerns were also raised in a 2017 Sabin Center for Climate Change Law paper around low access to key documents and limited public participation in the CAEP environmental committee where CORSIA was developed[12].

A pilot phase of CORSIA is operating from 2021-23 that represents around three-quarters of international flights, including *all EU member states and the US*. The first phase (2024-26) will also remain voluntary, with the second phase (2027-35) *applying to all ICAO member states* unless exempt, with a special review taking place in 2032 to determine the scheme's future. The *41st ICAO Assembly* in September 2022 will also likely decide on a baseline date to adopt for CORSIA's future phases.

The *IPCC's 2022 AR6 Report* notes that due to CORSIA's reliance on offsetting "by its nature, CORSIA does not lead to a reduction in in-sector emissions from aviation", particularly as most approved offsets are 'avoided emissions' rather than using fuels with reduced life-cycle emissions due to their higher cost over offsets, as these fuels are more expensive. "At its best, CORSIA is a transition arrangement to allow aviation to reduce its impact in a more meaningful way later." (10-63, 14-26).

This section analyzes the climate policy engagement of industry groups at ICAO. The September 2022 ICAO Assembly will likely decide on key rules around a long-term aspirational goal (LTAG) and over CORSIA's future phases, with no major decisions around a CO_2 standard expected.

12 *Aoife O'Leary, Transparency and ICAO's Aviation Offsetting Scheme: Two Separate Concepts?, Columbia Law School, Sabin Center for Climate Change Law, November 2017, p. ii*

Similarly, an independent scientific analysis, updated in May 2022 by *Climate Action Tracker (CAT) found that* CORSIA and ICAO's aviation climate strategy overall is *"critically insufficient"* in meeting Paris Agreement goals, with aviation's fair share of GHG emissions leading to a higher than 4°C world. It describes CORSIA as having "significant shortcomings", and highly unlikely to deliver the reductions needed even to achieve ICAO's aspirational goal of post-2020 carbon-neutral growth. CAT's analysis points to the voluntary coverage of CORSIA, estimated "to cover less than 50% of International aviation CO_2 emissions" over 2021-2035, alongside the low quality of CORSIA carbon offsetting credits, with low prices failing to trigger investments to reduce In-sector CO_2 emissions. It also suggests that CORSIA-eligible fuels may not deliver sufficient CO_2 emission reductions, as they only require a 10% emissions reduction compared to standard aviation fuels.

Moreover, some airlines CEO have recently criticized the industry's focus on offsetting to decarbonize the sector. Etihad CEO Tony Douglas *stated* in 2021 that offsetting is "a short-term stop-gap if you haven't got a more sustainable alternative, but it's cheating", while United Airlines CEO Scott Kirby in 2021 *noted* that "the truth is that carbon offsets, most of them aren't even real."

IATA and the CORSIA Offsetting Scheme

The International Air Transport Association (IATA) represents the global airline industry and 83% of total air traffic. InfluenceMap's 2021 *Corporate Climate Policy Footprint Report* found that IATA is the world's tenth most obstructive industry association on climate policy globally. Headquartered next to ICAO in Montreal, ICAO appears to draw on IATA's input to craft legislation[13]. IATA appears to have first promoted 'carbon neutral' aviation growth from 2020, advocated for ICAO to adopt the CORSIA offsetting scheme in 2016 to offset growing aviation emissions from 2020, and then in 2020 led efforts to weaken its ambition. Over this period, ICAO decision making appears to have reflected IATA's policy demands.

In 2007, IATA was the first to announce support for *"carbon-neutral" aviation growth*, later committing to *"carbon neutral growth from 2020"* in 2009 at Annual General Meeting (AGM). Next year, at the September 2010 ICAO Assembly, ICAO directly adopted a resolution "to achieve carbon neutral growth from 2020"[14]. Following this at IATA's 69th General Assembly in 2013, it *urged ICAO* "to adopt at the 38th ICAO General Assembly, a commonly agreed, single global MBM [Market-Based Mechanism] mechanism to be applied to offsetting the industry's growth in emissions post 2020", going on to say that it "STRONGLY ENDORSES the continuing efforts of its member airlines and States within ICAO to develop a comprehensive proposal towards a single, global MBM mechanism to address CO_2 emissions from aviation under ICAO, as opposed to a patchwork of unilateral national and/or regional policy measures".

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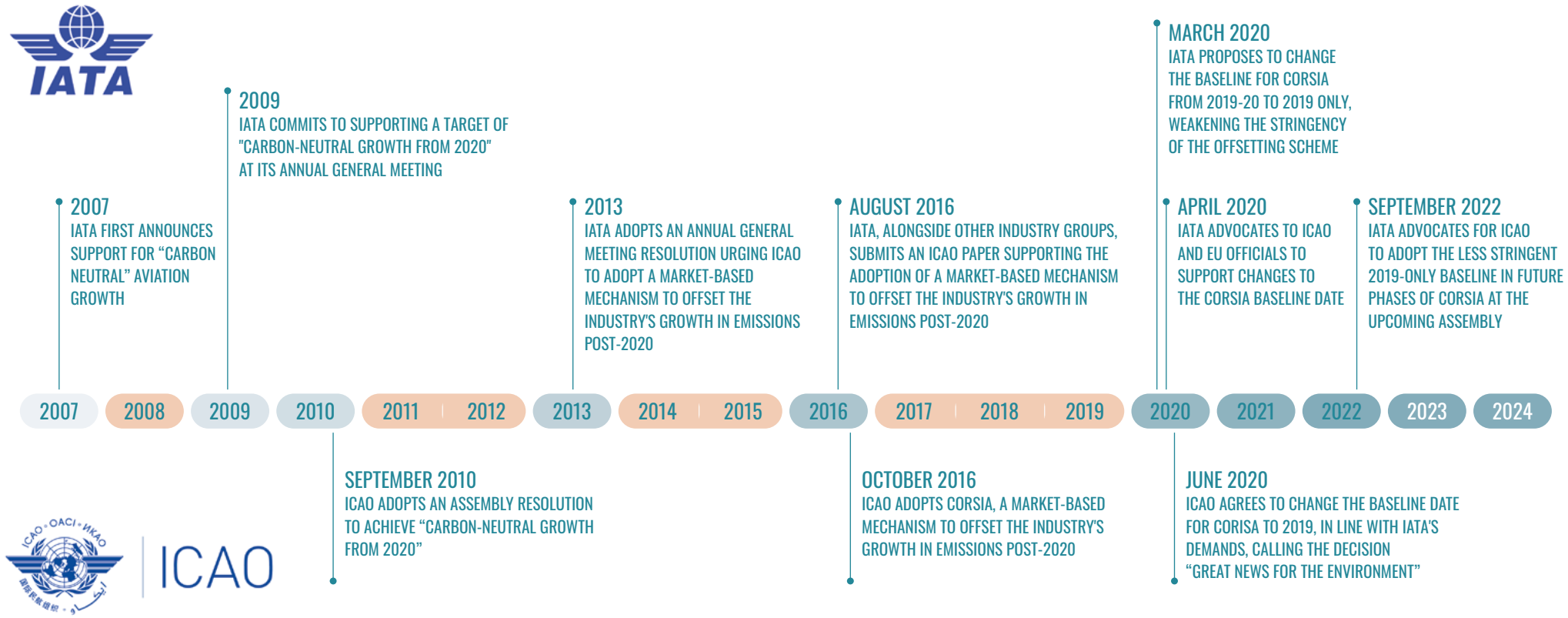
13 *Hayer, S, Decision-making processes of ICAO and IMO in respect of environmental regulations, Directorate-General for Internal Policies of the Union, European Parliament, 2017, p.34*

14 *ICAO Assembly Resolution A37-19: Consolidated statement of continuing ICAO policies and practices related to environmental protection - Climate Change, October 2010*

Diagram 2: Timeline of IATA's influence over CORSIA



In August 2016, IATA, alongside other industry groups, submitted an *ICAO Assembly working paper* supporting ICAO to "adopt a single GMBM [Global Market Based Mechanism] for international aviation" to stabilize "net emissions through carbon neutral growth for the sector from 2020 onwards", with the measure the "sole, global mechanism to address CO_2 emissions from international aviation, obviating the need for any duplicative regional or national measures."

This proposal appears highly similar to the finalized ICAO Assembly Resolution document outlining the CORSIA offsetting scheme in 2016[15]. Regarding CORSIA, this document states that ICAO "Decides to implement a GMBM scheme in the form of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) to address any annual increase in total CO_2 emissions from international civil aviation [...] above the 2020 levels" while also "noting the support of the aviation industry for a single global carbon offsetting scheme, as opposed to a patchwork of State and regional MBMs, as a cost effective measure." Such wording suggests CORSIA has been strategically designed to counter additional climate ambition from states or regions[16].

Following CORSIA's adoption, during the COVID-19 crisis, the International Air Transport Association (IATA) *led efforts* at ICAO to change CORSIA's baseline year from the average emissions of 2019-20 to just 2019. The change was first proposed in a *March 2020 IATA position paper*, with IATA advocating that "CORSIA's baseline must be adjusted to [...] avoid an inappropriate economic burden on the sector." Alongside *advocating to a senior ICAO official* in April 2020 to support the baseline change, evidence uncovered in a freedom of information (FOI) request by InfluenceMap revealed IATA *lobbied* EU officials in a private April 2020 meeting for their support. FOI documents also highlighted how IATA member Qantas Airways emailed the IATA position paper to the Australian government in April 2020 to urge them to *"support"* the baseline adjustment in the ICAO Council. In June 2020, the *ICAO Council agreed to change* the baseline date for CORSIA to 2019, matching IATA's proposals. ICAO's press office on Twitter praised the decision as *"great news for the environment"*, and explained the change of policy in a press release by using the phrasing *"avoid inappropriate economic burden"* in reference to the aviation industry.

The baseline change date significantly reduced CORSIA's emissions offsetting potential, ensuring that offsetting is not required until aviation's CO_2 emissions increase above 2019 records, which IATA forecasts will not be *until 2024,* due to a worldwide air traffic decline during the COVID-19 crisis. In 2022 there will likely be very limited offsetting requirements for airlines due to this baseline change. For example, American Airlines, notes in their *2021 annual report* that "we do not expect to be required to purchase carbon offset credits to comply with CORSIA through 2023, unless the recovery in demand for international travel is unexpectedly strong and exceeds that of 2019 in those years."

15 *ICAO Assembly Resolution A39-3: Consolidated statement of continuing ICAO policies and practices related to environmental protection – Global Market-based Measure (MBM) scheme, 2016*

16 *Chris Lyle, Beyond the icao's corsia: Towards a More Climatically Effective Strategy for Mitigation of Civil-Aviation Emissions, Climate Law, 2018, p. 113*

Diagram 3: Similarities between IATA and ICAO's CORSIA baseline change proposals

IATA Position Paper (March 2020)

As the current CORSIA provisions call for 2020 emissions to be used in determining the baseline for CORSIA, this reduction in traffic will **significantly lower the baseline** compared to what was projected as a basis for adopting CORSIA, resulting in **significantly higher offsetting requirements** and costs for operators further down the line. CORSIA's baseline must be adjusted to ensure the sustainable development of international aviation and avoid **an inappropriate economic burden** on the sector. [...] Instead of using the average of 2019 and 2020 emissions to determine the CORSIA baseline, **IATA recommends that 2019 emissions be used for the determination of CORSIA's baseline emissions**.

ICAO Press Release (June 2020)

The impact of the COVID-19, significantly lowering international aviation operations, traffic and emissions in 2020, would lead to a **consequential reduction in the CORSIA baseline**, calculated as the average of 2019 and 2020 emissions from the sector. This, in turn, would create an **inappropriate economic burden** to aeroplane operators, due to the **need to offset more emissions** although they are flying less and generating less emissions. [...] **the Council determined that the value of 2019 emissions shall be used for 2020 emissions** to avoid **inappropriate economic burden** on the aviation industry, for the CORSIA implementation during the pilot phase from 2021 to 2023.

IATA itself estimated that a weaker baseline date would save airlines *$15 billion in offsetting costs*, with the International Council on Clean Transportation (ICCT) finding the change would *leave around 81 million tons of emissions* no longer required to be offset. An *Environmental Defense Fund analysis* also found that under most scenarios the baseline change "would eliminate all offset requirements for three to five years." Such a change also appears to have been publicly supported by *International Airlines Group (IAG)*.

The September 2022 ICAO Assembly, ICAO's ultimate decision-making body, is likely to decide whether it will keep the *weaker 2019-only baseline for CORSIA* or revert to the more stringent 2019-20 baseline for the next two CORSIA phases, which would require airlines to purchase more offsets. An IATA working paper from August 2022 appeared to urge the ICAO Assembly to *extend the weaker 2019-only baseline for CORSIA until 2035*, rather than applying it only to the CORSIA pilot phase in 2021-23, likely further reducing the long-term offsetting requirements of CORSIA. Media reports suggest IATA eventually *withdrew* the working paper during Assembly negotiations.

ICAO has also faced public scrutiny for a revolving door between industry and the UN body. In July 2021, ICAO was criticized *for hiring* the *former Executive Director of the Air Transport Action Group (ATAG) (a cross-industry aviation group at ICAO)*, and *Director for Aviation & Environment at the International Air Transport Association (IATA),* Michael Gill, as Director of Legal Affairs and External Relations. Previously, when working for IATA, S&P Global reported that Michael Gill had *advocated to ICAO* in 2020 to weaken the CORSIA offsetting scheme by changing the baseline date from 2019-20 to 2019 only. Michael Gill was also directly quoted in a *March 2021 FT article* arguing that IATA's focus was on "making CORSIA a success" while advocating against more stringent EU climate policy for aviation.

The aviation industry has strategically used its support for the CORSIA offsetting scheme to push back against more ambitious regional and national climate policies (see *InfluenceMap's Aviation Industry and European Climate Policy* report), by arguing such policies will 'endanger' global action at ICAO. IATA also leveraged its support for CORSIA in a May 2022 blog, which *argued* that more stringent EU climate measures "undermines the international consensus for climate action that has been delicately forged at ICAO." This position appears to reflect that of ICAO itself. A 2019 ICAO Assembly Resolution notes that "CORSIA is the only global market-based measure applying to CO_2 emissions from international aviation so as to avoid a possible patchwork of duplicative State or regional MBMs, thus ensuring that international aviation CO_2 emissions should be accounted for only once"[17].

Moreover, in an *August 2022 working paper*, IATA urged the ICAO Assembly to "reinforce that CORSIA is the only measure for addressing international aviation emissions". The paper further advocated to change the ICAO resolution's language on CORSIA from "avoid a possible patchwork of duplicative State or regional MBMs, thus ensuring that international aviation should be accounted for only once" to "preclude duplicative State or regional MBMs, understanding duplicative MBMs include those that would apply to international emissions already covered by CORSIA through exemptions and/or offsetting requirements, thus ensuring that international aviation should be accounted for only once".

17 *ICAO Resolution A40-19, Consolidated statement of continuing ICAO policies and practices related to environmental protection – CORSIA, Clause 18, 2019*

CO_2 Standards

In 2016, ICAO finalized a binding CO_2 emissions standard requiring an average *4% reduction in new aircraft's cruise fuel consumption* in 2028 from a 2015 baseline, the first global industry sector to adopt a CO_2 emissions standard. However, the policy did not mandate efficiency improvements beyond current technologies. A 2020 International Council on Clean Transportation (ICCT) study found that the UN's CO_2 standard *lags technology by more than a decade*, with the average new aircraft delivered in 2019 already meeting the ICAO 2028 CO_2 standard by 6%, suggesting the measure fails to promote fuel efficiencies above and beyond business as usual.

Aerospace Manufacturers and CO_2 standards

In 2016, *emails released by FOI* appeared to show Airbus influencing the EU's negotiating position on ICAO CO_2 standards for aircraft. Before a 2016 CAEP meeting, the EU Transport directorate sent Airbus a draft paper on its CO_2 standard position. This was followed by multiple meetings, emails, and exchanges between the Commission and Airbus to determine an acceptable position from Airbus' perspective, with Airbus able to accept the track changes in the EU's position by email. Before submission, Airbus made final suggestions to change the EU's positioning, responding "Yes, we can live with this" to the EU's final proposal. Additionally, on the first day of the CAEP meeting, Airbus *sent a letter to the EU Commission* entitled 'Airbus redlines', which ended with Airbus writing "please confirm that the Commission and Europe will support Airbus and respect those red lines." The EU then was reported to take a *weaker climate position* on CO_2 standards than the US during negotiations.

Industry also appears to have advocated for states to adopt even less stringent CO_2 standards for airplanes when certifying CO_2 rules into national law, promoting the ICAO standards as a ceiling, rather than a floor for higher national ambitions. For example, in July 2020 the *New York Times reported* that the Trump administration sought to adopt ICAO standards into national law, with *support* from Boeing. Yet a September 2020 Boeing US consultation response appeared to urge the US government to *weaken the standard when adopting ICAO's rule*, urging a delay to regulate in-production mid-size widebody purpose-built freighter aircraft from 2028 to 2038 in the ruling. Moreover, in responses to the same September 2020 consultation, both *Boeing* and *Airbus* appeared to oppose CO_2 standards more stringent than ICAO's. Later, in December 2020 the Trump administration *adopted ICAO's global* CO_2 *standard for aircraft* into US law. Reuters reported in February 2021 that Boeing had sought to *intervene* against US environmental groups that had bought a legal case against the EPA on the basis that the Trump-era rule "would result in no GHG reductions at all compared to business-as-usual." Following this intervention, in 2021, the EPA formally decided *not to re-write the Trump-era* CO_2 *standards*.

Supersonic Aircraft, Climate Impacts, and ICAO

Since the Concorde was *retired* in 2003 there have been no commercial supersonic flights, yet interest in supersonic aircraft has resurged following new commercial projects under development from aerospace companies like Boom Technology. New supersonic aircraft are expected to burn *7 to 9 times* more fuel than subsonic aircraft per seat-km flown, likely resulting in significant climate impacts. The huge volume of fuel burned also likely restricts the real-world possibility of using sustainable aviation fuels (SAFs) and e-fuels for supersonic aircraft, particularly at a *feasible cost*.

InfluenceMap's analysis finds that 3 Boom Supersonic representatives appeared to participate in the CAEP 12 2022 Working Group as part of ICCAIA. Furthermore, over a series of tweets, Boom Supersonics' former lobbyist revealed that *during* the Trump administration *Boom Supersonic* had "worked out a contract to pay FAA [Federal Aviation Administration] salaries so they could attend" an ICAO meeting to prevent them from being "steamrolled."

During the 40th ICAO assembly in 2019, a US Working Paper *expressed commitment* to "advancing the development of supersonic aircraft." It also appeared to support new supersonic engine emissions standards in CAEP, requesting states do not "stand in the way of innovation" and urged for "timely" policy decisions as delays "have the potential to negatively impact these manufacturers and their supersonic programs."

In a 2022 US consultation response, the Aerospace Industries Association (AIA), a key member of ICCAIA, and a CAEP industry observer *disclosed* that "AIA supports updated supersonic LTO [landing and take-off] emissions standards through the ICAO CAEP process" and "supports the inclusion of the current US supersonic engine emissions standards in the revised rule including harmonization with the ICAO provisions for these engines."

ICAO itself appears to have completed an exploratory study on "noise, emissions, and fuel burn for notional supersonic aeroplanes" in 2022, according to an *IBAC press release.* However, ICAO does not appear to have publicly released the results of the study.

The Global Aviation Industry and a Net-Zero 2050 CO2 Aspirational Goal

Since 2010, ICAO has researched the feasibility of a long-term aspirational goal for international aviation, which would set a non-binding, long-term emissions reduction goal for the sector. At COP26, over 20 states formed the International Aviation Climate Ambition Coalition, *signing an aviation climate declaration* committing the states to work together "both through ICAO and other complementary cooperative initiatives, to advance ambitious actions to reduce aviation CO2 emissions at a rate consistent with efforts to limit the global average temperature increase to 1.5°C." It further included support for the adoption of an "ambitious long-term aspirational goal" at ICAO consistent with a 1.5°C temperature limit and "in view of the industry's commitments towards net zero CO2 emissions by 2050" alongside "ensuring the maximum effectiveness of CORSIA" and promoting sustainable aviation fuels (SAFs). Yet the declaration did not support *binding* aviation emission reductions or commit to stringent policies to meet a 1.5°C goal.

In February 2022, ICAO's triennial CAEP meeting concluded having *agreed to amendments* on a long-term aspirational goal (LTAG) for international aviation emissions. In March 2022, following input from 280 experts, a CAEP working group published a *major report* covering long-term trends, the potential of new technologies and fuels, and the cost implications of an LTAG. The LTAG was further discussed in a *July 2022 high-level ICAO meeting*. Following this, media reports offered *"cautious optimism"* that member states would reach a collective agreement at the 41st ICAO Assembly to adopt an LTAG of net zero carbon emissions from international aviation by 2050 in September 2022.

Long-term Aspirational Goal (LTAG)

In 2009, the air transport industry, following IATA, set a sector-wide goal to decrease emissions by *50%* by 2050. IATA continued to promote this target until October 2021, when it agreed to increase its ambition by supporting a *global net-zero 2050 target*, following similar commitments by key airline industry associations in the US (*Airlines for America*), and in the EU (*Airlines for Europe*). Since this commitment, IATA appears to have frequently *advocated* for ICAO to set a long-term aspirational goal (LTAG) for aviation of net-zero carbon emissions by 2050. In alignment, many airlines, manufacturers, and industry associations in 2021-22 have supported a goal of net-zero CO2 emissions from global aviation by 2050, including *ICCAIA*, *Air France-KLM*, *Airbus*, *Boeing, International Airlines Group (IAG)* and *Lufthansa*.

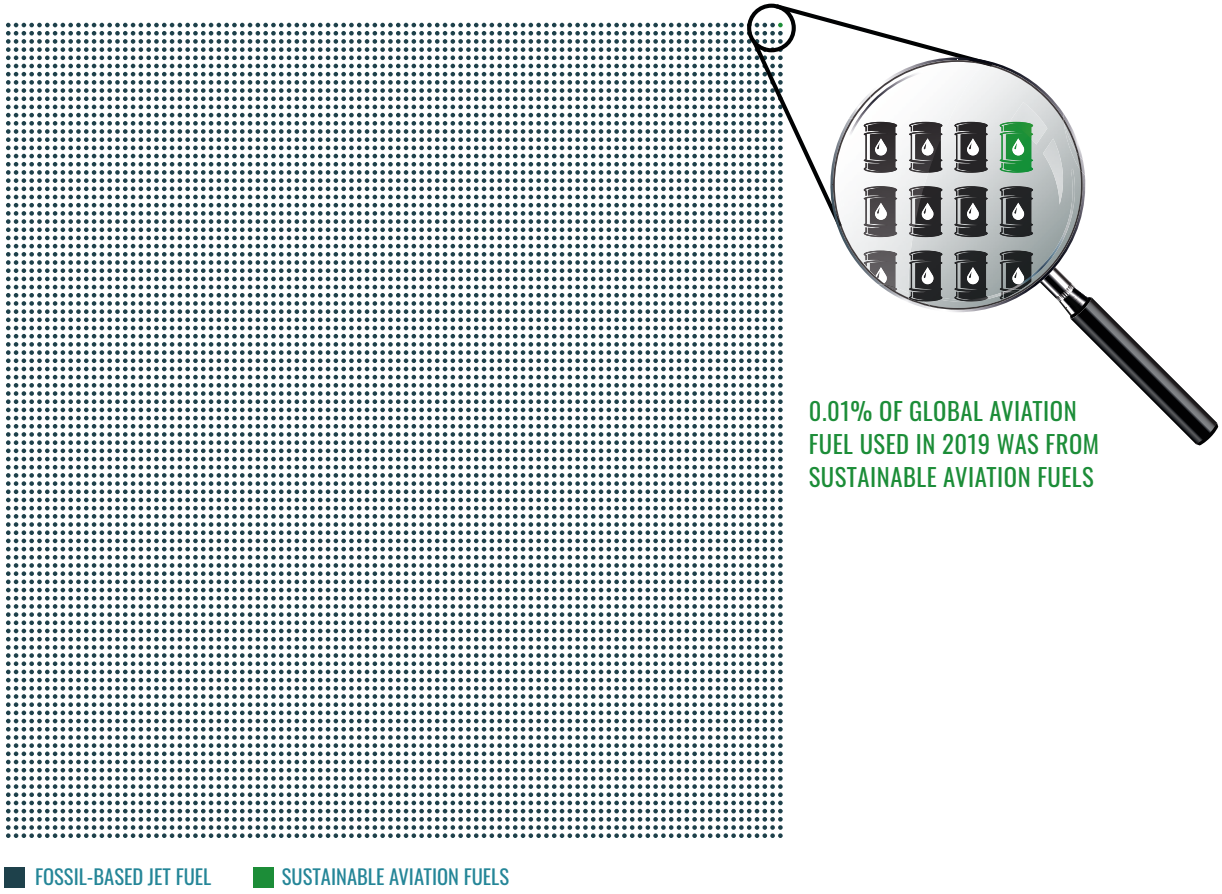
Yet in June 2022, the *Financial Times* reported that key IATA members had doubts about meeting the 2050 net-zero target. This includes Qatar Airways CEO Akbar Al Baker, who stated the target would be "very challenging", and the CEO of Etihad, Tony Douglas, who the FT reported "has suggested that some executives have signed up to the 2050 goal knowing they would be gone when the target was missed." Similarly Delta Airlines CEO, Ed Bastian, also *noted in a July 2022 national post article* that "We're not on a path to deliver" the 2050 goal, advocating for governments to help energy firms invest in more sustainable fuels. IATA's net-zero plan itself *relies on* new technologies (e.g. SAFs) and efficiency improvements to abate 81% of emissions while offsetting and carbon capture and storage are used to make up the shortfall.

Historically championed voluntary climate targets for the sector that it has failed to meet. A 2022 *Possible study* analyzed every public climate target the international aviation industry set itself since 2000, finding that all but one

of over 50 climate targets had been missed, abandoned, or forgotten about. For example, IATA itself failed to meet the four global SAF targets it had set in 2007 (10% by 2017%), 2011 (6% by 2020), 2012 (4.5% by 2020), and 2014 (3% by 2020), with each target becoming progressively weaker over time. Instead, actual SAF usage globally remains at *around 0.01%* of all jet fuel used, with aviation effectively fossil-fuel captive.

This analysis therefire suggests that the global aviation industry has used its support for net-zero, and other voluntary targets, in PR campaigns to help promote 'sustainable' flying and at the same time distract attention away from policy efforts that would directly address in-sector aviation emissions, particularly at national and regional levels. This reflects lobbying tactics highlighted by previous InfluenceMap research on the *European aviation industry*.

Diagram 4: Global aviation fuels usage for the airline industry in 2019



ICAO, Aviation Demand and Demand Management Policies

The 2022 *IPCC AR6* report recognized that "Fundamental shifts in technology, fuel types or changes of behavior or demand" are needed to reach a 1.5°C goal (10-59, 8-12). 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 (10-64, 10-30). In June 2022, an *ICCT report* also found that to meet Paris Agreement goals, aviation emissions must peak by 2030 at the latest, and public policies, such as SAF mandates, carbon taxes, and demand management will be needed to bridge price gaps between alternative and fossil jet fuels. As aviation is likely to remain heavily fossil-fuel dependent in the near future, reducing traffic demand is therefore crucial to meeting global climate targets.

However, IATA and its member airlines appear to have opposed specific demand management policies and promoted unrestricted aviation growth. FOI documents from a June UK 2021 consultation show that *International Airlines Group (IAG)* and *American Airlines* opposed a UK frequent flyer levy, while IATA in the same consultation appeared to *advocate to abolish* the UK Air Passenger Duty, the UK's primary de-facto aviation climate policy, noting that "IATA believes that higher taxation will dampen demand." Similarly, an April 2021 Euractiv report found that IATA board member Air France-KLM *lobbied* to weaken France's ban on domestic flights from journeys where an alternative train journey of fewer than four hours existed, to two and a half hours. The 2019 Aviation Benefits report, *published jointly* by the Industry High-Level Group (consisting of ICAO and key industry groups including IATA), also promoted the long-term benefits of aviation expansion, stating that "both air passenger traffic and air freight traffic are expected to more than double in the next two decades" and that "this growth holds tremendous economic potential." An IATA cross-industry ICAO Assembly 2016 working paper supported a global market-based measure for aviation *with the exception* that "it should not be designed or used to raise general revenues or to suppress demand for air travel."

ICAO itself has not promoted any measures to curb aviation growth in line with global climate targets and instead appears to prioritize expanding international aviation traffic in line with industry positions. *ICAO's original 1944 mandate* included to "insure the safe and orderly growth of international civil aviation throughout the world", a mandate seemingly in competition with its role to reduce GHG emissions, with ICAO's current complete *vision statement* to "achieve the sustainable growth of the global civil aviation system." Yet reducing short, medium, and long-term aviation demand remains a key part of meeting Paris Agreement targets, with efficiency improvements alone too small to offset growing emissions from future travel demand. For example, leading up to the COVID-19 pandemic, ICCT analysis found that traffic increased almost *four times faster* than fuel efficiency improved for global aviation. The *IPCC AR6* report also found that "the literature does not support the idea that there are large improvements to be made in the energy efficiency of aviation that keep pace with the projected growth in air transport" (10-60, 4-6).

PR Campaigns and High-level Messaging

Despite leading lobbying efforts to weaken and delay Paris-aligned climate regulation, and failing to meet its own voluntary climate targets, the aviation industry has employed numerous PR campaigns to give the impression of positive climate action in recent years.

- In 2019, IATA coordinated the Fly Aware campaign, to counter the 'flight shaming' movement, weakening demand for air travel in Europe. 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." However, the FlyAware campaign appears to have been pulled, as of 2022.

- At a global level, ATAG now coordinates the *'Aviation Benefits Beyond Borders' PR campaign,* which is supported by IATA and global aviation industry groups. The campaign intends "to provide clear information" on the environmental initiatives employed by the industry and inform people about the "important role aviation plays in the economy and society." *The Waypoint 2050 report*, published by ATAG in September 2021, aims to reach 10 billion passengers/year (*more than double* the number of passengers flown in 2019), while simultaneously reaching net-zero emissions by 2050 through SAFs, zero-emissions aircraft, infrastructure, and operations improvements, and a heavy reliance on offsetting. The report predicts that by 2050 international aviation will require 410-555 billion liters of SAF per year to decarbonize, compared to *around 100 million liters* of global SAF production in 2021.

- ATAG has further coordinated the *#FlyNetZero* campaign which uses videos of young aviation industry professionals on the *'We Are Aviation'* Twitter account to promote the industry's commitment to net-zero emissions by 2050. Each video opens reading 'Fly Net Zero: A Sustainable Future for Flight'. However, considering the sector's *dependence* on a limited supply of SAFs and unrealiable high-quality offsets, alongside emerging technologies that are yet to be commercialized, the aviation industry's projected 'future' of over *50% growth* by 2050 is extremely *unlikely* to adhere to a 1.5-degree temperature goal. Such campaigns appear similar to those promoted by IATA member KLM in the Netherlands, where in April 2022, the Dutch advertising regulator ruled that KLM was *misleading its customers* by using terms such as 'fly CO_2 zero'. Following this, in July 2022 *a lawsuit was filed against KLM* after the airline refused to stop advertising misleading claims that it is making flying sustainable.

Appendices

Appendix 1: Corporate Membership of IATA

Airline	Relationship
Air France-KLM	
American Airlines	
Delta Airlines	
International Airlines Group (IAG)	
Lufthansa	
Qantas Airways	
United Airlines	
Aircraft Manufacturer	
Airbus	
Boeing	

Note: the primary members of ICCAIA are national and regional industry associations, rather than individual companies.

Table Key

Member of IATA | Board Member of IATA | Not a member of IATA