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Director-General
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European Commission

In support of an effective non-CO₂ MRV framework in the EU ETS to mitigate non-CO₂ effects of aviation

Dear Minister,
Director Generals,

We are writing to draw attention to the efforts to limit the scope of the proposed non-CO₂ monitoring framework and the significant risk this poses in limiting both our understanding of the science and ability to mitigate the impact of non-CO₂ effects.

Non-CO₂ effects from aviation, including nitrous oxides emissions and contrail formation, are known to have an impact on the climate. While our knowledge of these effects today is not as extensive as that of CO₂, scientific consensus, gathered by EASA in its [2020 report](#), highlights that their warming effects could have a significant impact comparable to CO₂. Therefore, understanding and addressing these effects could be an effective way to help mitigate the climate impact of aviation in the coming decade, and should be a vital part of our efforts to combat climate change.

Acknowledging their environmental impact, the groundbreaking EU ETS agreement adopted in 2022 has paved the way for addressing non-CO₂ effects by requiring the development of a Monitoring, Reporting and Verification (MRV) framework. This represents a historic first step to understand and act as appropriate on non-CO₂ effects, as it can help boost research and inform policymakers and the aviation industry on the best set of policies and incentives for their effective mitigation.

The MRV framework, proposed by the European Commission under guidance from the research community and airlines, aims at monitoring, reporting and verifying the non-CO₂ impacts of flights by using available data and the most advanced models to quantify their effect. It is critical to

maturing research in the area, and its flexibility means that any relevant improvements on models or data availability can be quickly incorporated into the framework.

A key feature of the MRV framework is the full geographic scope of the reporting. It includes all flights entering or leaving the European Economic Area (EEA). This is consistent with the general scope of the EU ETS Directive for other transport modes and their non-CO₂ emissions. Shipping companies are required as of 2024 to monitor maritime non-CO₂ emissions (nitrous oxide (N₂O) and methane (CH₄)) for voyages to, from, and within the EU.

It is critical that the full geographic scope is retained, as it is the only scientifically sound basis to understand the impact of aircraft types and geographies, and allow a better understanding of the impacts of long-haul flights which research shows to [cause more warming](#) and present [larger mitigation opportunities](#). It is vital that activity in areas such as the [North-Atlantic region](#), with a high concentration of contrail formations, are monitored and understood.

Given the volume of their contribution to this issue, any deviation to exclude long-haul routes from the scope would be a significant missed opportunity which would empty the MRV of most of its meaning from a climate impact mitigation perspective, and undermine the scientific basis for future action. It would also go against the original agreement between the co-legislators.

There are pragmatic ways forward to avoid imposing unnecessary burdens on airlines, in particular non-EU airlines. It is also important that the proposed framework finds ways to automate reporting, while creating a simplified option for smaller airlines who may not have the resources to devote to the data collection. The MRV must remain cost-effective while achieving its goals.

Against this background, we support the Commission's proposal by noting the need to:

- Implement a non-CO₂ MRV framework with full geographical scope under the EU ETS, as agreed by co-legislators, and address any concerns with the MRV through measures that will not meaningfully limit the scientific value of data it creates.
- Ensure a flexible framework that can be improved with the integration of the latest available science.
- Use the retrieved data to boost scientific understanding of non-CO₂ effects and mitigation pathways.

Keeping these features of the MRV are essential to tackle aviation's full climate impact while strengthening European leadership on sustainable aviation.

Yours sincerely,



