

Brussels, 21 April 2026

**Subject: civil society and industry stakeholders calls upon the European Commission to extend the scope of the carbon market to all departing flights**

Dear Executive Vice-President Ribera, Commissioner Hoekstra, and Commissioner Tzitzikostas,

We, the undersigned NGOs, industry actors and associations, are joining forces to urge the European Commission to use the upcoming revision of the EU Emissions Trading System (EU ETS) to extend the scope of aviation ETS coverage to all departing flights from Europe.

The 2026 ETS review offers a critical opportunity to correct a longstanding gap in European climate policy and to ensure that aviation finally makes a fair contribution to Europe's climate objectives. While aviation has been included in the EU ETS since 2012, the system still excludes the vast majority of emissions: extra-EEA flights that rely on CORSIA. As a result, the carbon market is still failing to cover most aviation emissions linked to Europe. Around [70% of EU aviation CO<sub>2</sub> emissions](#) remained outside the European carbon market.

This severely weakens the carbon price signal for aviation. Despite the start of the phase-out of free allowances in 2024, the effective carbon price actually paid by airlines was only around €22 per tonne of CO<sub>2</sub> in 2025, compared with an average ETS carbon price of €73 across the system as a whole. Under these circumstances, European aviation growth remains unchecked and undermines the CO<sub>2</sub> emission reduction targets adopted by the European Union. Indeed, aviation emissions have risen by more than 30% since 2005 - the start of the ETS - while emissions from other sectors have declined.

This current framework is also producing damageable [distortions](#) between carriers. Third-country airlines such as Emirates and United Airlines, despite emitting at levels comparable to major European carriers, face lower carbon costs because a larger share of their operations falls outside the current ETS scope. Extending the ETS to all departing flights would help restore a level playing field while giving proper effect to the polluter pays principle.

Likewise, continued reliance on the international offsetting scheme CORSIA to address the majority of Europe's aviation emissions is deeply problematic:

- CORSIA is based on offsetting, including credits of questionable environmental integrity, and therefore does not guarantee real emissions reductions within the aviation sector;
- The scheme is projected to cover only around [26% of EU aviation CO<sub>2</sub> emissions](#) by 2035;
- Several key aviation markets, including Russia, China, Brazil, India, and the United States, have not implemented CORSIA into national law.

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In practice, CORSIA risks allowing airlines and governments to claim progress at low cost while delaying investment in the real decarbonisation measures the sector urgently needs. Moreover, at the latest ICAO General Assembly in September 2025, no measures were adopted to strengthen CORSIA. In addition, the 126 Member States that committed to participate in CORSIA from 2024 account for only [66% of global CO<sub>2</sub> emissions](#), below the threshold set in EU law. On both counts, the conditions for reliance on CORSIA have not been met.

The Commission should therefore act decisively in the upcoming ETS revision and propose the extension of the aviation ETS scope to all departing flights from Europe.

Extending the scope of the aviation ETS would also create a vital source of funding for the decarbonization of the economy, in particular transport, and to contribute to international climate finance. With extended scope, Member States could receive nearly €14 billion from aviation by 2030. This would also make aviation decarbonization technologies and low-carbon alternatives, such as rail, more competitive. In the context of intensifying international competition for clean technology investment and manufacturing capacity, this is not only a climate imperative but an industrial one.

The EU has rightly positioned itself as a global leader on climate action and on the implementation of the polluter pays principle. The 2026 ETS review is the moment to close this loophole and ensure that aviation contributes credibly and fairly to Europe's decarbonisation pathway.

Yours sincerely,

The logo for T&E, featuring a stylized 'E' symbol to the left of the letters 'T&E' in a bold, sans-serif font.The logo for CAN (Climate Action Network Europe), featuring a circular graphic with green and blue waves above the text 'CAN' and 'CLIMATE ACTION NETWORK Europe' below it.The logo for Carbon Market Watch, featuring a stylized eye graphic above the text 'CARBON MARKET WATCH' in a blue box.The logo for Bellona, featuring the word 'BELLONA' in a bold, serif font, framed by two horizontal black bars.The logo for Opportunity Green, featuring the words 'OPPORTUNITY GREEN' in a bold, sans-serif font, with a green circular graphic to the left.The logo for Climate Catalyst, featuring a stylized sunburst graphic to the left of the text 'Climate Catalyst'.The logo for Germanwatch, featuring a purple globe graphic above the text 'GERMANWATCH' in a purple, serif font.The logo for Natuur & Milieu, featuring the words 'NATUUR & MILIEU' in a bold, black, serif font.The logo for zero., featuring the word 'zero.' in a bold, blue, sans-serif font.

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