

Appendix A – British Airways

Table of the Relevant Statements and alleged breaches

Statement	OECD Guideline and/or other codes breached
Misleading claims about reducing emissions	
<p><i>“we care about the impact of every flight”; “we’re driving urgent action towards net zero emissions. We have a long history of managing and reducing our carbon emissions and a clear roadmap to achieving net zero carbon emissions by 2050”.</i>¹</p> <p>The ‘Sustainability at British Airways 2023’ page (“the Sustainability 2023 page”) within the ‘mediacentre’ section of BA’s website claims that the airline is “reducing our emissions”.²</p> <p>BA’s “<i>fuel saving initiatives</i>” on its Sustainability 2023 page as part of its “<i>short term initiatives</i>” to get its emissions into alignment with net-zero.</p>	<p>OECD Chapter VI, para 1(d) OECD Chapter VI, para 5(c) OECD Chapter VIII, para 2 OECD Chapter VIII, para 4</p> <p>CAP Code Rule 11.7 CMA Guidance paragraph 3.41 ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11</p>
Misleading claims about efficiency	
<p>BA’s claim to be improving the fuel efficiency of its fleet by retiring older, less efficient aircraft and replacing them with newer, more efficient models. The airline has said that it has “<i>invested in new</i></p>	<p>OECD Chapter VI, para 1(d) OECD Chapter VI, para 5(c) OECD Chapter VIII, para 2, read with para 97</p>

¹ www.britishairways.com/en-ba/information/about-ba/ba-better-world/planet

² <https://mediacentre.britishairways.com/factsheets/details/86/Factsheets-3/217?category=1>

<p><i>aircraft which are up to 40% more fuel-efficient than those they replace”³</i></p> <p><i>“many of our older aircraft have been retired and we continue to take delivery of the most modern, fuel-efficient aircraft, such as the Airbus A350 that are up to 40% more fuel-efficient per seat than the aircraft they replace.”⁴</i></p> <p>Ba’s claim on its Sustainability 2023 webpage that <i>“we have said goodbye to our entire fleet of Boeing 747s, years earlier than planned”</i>, set out under a section headline <i>“Short-term initiatives”</i> and <i>“Changing how we fly”</i>.⁵</p>	<p>OECD Chapter VIII, para 4</p> <p>CAP Code Rule 11.7</p> <p>CMA Guidance paragraph 3.41</p> <p>ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11</p>
<p>Misleading claims about carbon credits</p>	
<p>BA’s claim on its Sustainability 2023 page that its use of offsets allows customers to <i>“Fly carbon neutral”</i>.</p> <p>BA’s claim on its Sustainability 2023 webpage that customers are able to <i>“address their emissions”</i>, and its claim on its Planet page that invites passengers to <i>“act on”</i> their carbon emissions.</p> <p>BA’s claims on its ‘CO2llaborate’ page that: <i>“Our carbon solutions are verified by comprehensive certification standards to ensure that your contribution <u>creates a positive climate impact</u>”</i> and its related claim on its Sustainability 2023 webpage that <i>“we are empowering</i></p>	<p>OECD Chapter VI, Paragraph 1(d)</p> <p>OECD Chapter VI, para 5(c)</p> <p>OECD Chapter VIII, para 2, read with para 97</p> <p>OECD Chapter VIII, para 4</p> <p>CAP Code Rule 11.7</p> <p>CMA Guidance paragraph 3.41</p> <p>ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11</p>

³ www.energylivenews.com/2021/03/30/is-british-airways-the-second-biggest-airline-polluter-in-europe/

⁴ www.britishairways.com/cms/global/pdfs/information/ba-sustainability-performance-report.pdf

⁵ <https://mediacentre.britishairways.com/factsheets/details/86/Factsheets-3/217?category=1>

customers to make more sustainable travel choices by introducing the new, upgraded climate software solution, CO2llaborate”.

Misleading claims about carbon credits

BA’s offering on its ‘CO2llaborate’ page of the purchase of credits from carbon ‘removal’ projects⁶, including the claim that purchasing one biochar ‘removal’ credit eliminates the impact of a plane emitting one tonne of CO2

“Given that the relative scale of impact is uncertain and subject to ongoing research, we are using a radiative forcing index of 1. This will be reviewed when further information becomes available.”⁷

BA’s invitation on its “Co2llaborate” page to customers to “Act on your carbon footprint”, and its explanation of ‘carbon footprint’ under FAQs on the same page:

“Your carbon footprint is a simple way of showing how your lifestyle leads to carbon emissions. It’s your impression on the planet.

By carbon emissions, we mean greenhouse gases – mostly carbon dioxide, methane and nitrous oxide. Humans produce these gases in vast quantities by doing things like burning coal, oil and gas for energy and cutting down forests and through agriculture. Your individual emissions are built up from your

OECD Chapter VI, para 5(c)
OECD Chapter VIII, para 2, read with para 97
OECD Chapter VIII, para 4

CAP Code Rule 11.7
CMA Guidance paragraph 3.41
ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11

⁶ <https://ba.choose.today>

⁷ https://www.pureleapfrog.org/ba/carbon_neutral-faqs/

personal consumption of e.g. electricity and travel, as well as the energy that's required to produce your food and all the other stuff you buy, whether it's made in the UK or elsewhere in the world.

We convert all the different greenhouse gases into an equivalent impact from carbon dioxide, the most common human-caused greenhouse gas. Your footprint value is an annual figure in "tonnes of carbon dioxide equivalent – or tCO2e."

"IAG [BA's parent company, International Airlines Group] has announced a Climate Change strategy to meet target of net zero carbon emissions by 2050 and is implementing plans to meet this goal, including investment in sustainable fuels and participation in the Carbon Offsetting and Reduction Scheme for International Aviation."⁸

Misleading claims about alternative fuels

"Projects British Airways has invested in include turning household waste and wood waste into sustainable aviation fuel and capturing carbon from the atmosphere and form part of the airline's plans to achieve net zero carbon emissions by 2050."⁹

BA's owner IAG's statement that "it plans to purchase one million tonnes of sustainable jet fuel each year by 2030, which will be the

⁸ www.iairgroup.com/~media/Files/I/IAG/annual-reports/ba/en/british-airways-plc-annual-report-and-accounts-2020.pdf

⁹ <https://mediacentre.britishairways.com/news/26072021/british-airways-and-partners-shortlisted-for-government-funding-for-four-ground-breaking-projects-to-decarbonise-aviation?ref=News>

equivalent of removing one million cars from Europe's roads each year.”¹⁰

“SAF is also available as an option for fliers who wish to go that extra mile. Selecting this option will allow customers to part fuel their journey with fuel made from captured and recycled carbon such as food waste”.¹¹

“converting household waste into jet fuel by 2025 [results in] avoiding landfill and reducing life cycle CO2 emissions by up to 100% compared to fossil-based jet fuel.”¹²

“Whilst only available in small supply globally, the SAF we use can reduce lifecycle emissions by 80% or more compared to traditional jet fuel”.¹³

BA’s claim that SAF “generally [produce] up to 70% less carbon than fossil fuels.”¹⁴

BA’s claim that it has a net zero by 2050 strategy, i.e. that it is able to bring its business model into alignment with the world’s vital climate target while continuing to operate very large numbers of flights

BA’s claim that alternative fuel company Velocys’ US project, from which it plans to buy fuels, will include technology to “capture CO2

¹⁰ www.reuters.com/business/sustainable-business/british-airways-owner-iag-makes-sustainable-fuel-commitment-2021-04-22/

¹¹ <https://www.pureleapfrog.org/ba/carbon-offset-projects/>

¹² <https://www.britishairways.com/en-ba/information/about-ba/ba-better-world/planet>

¹³ <https://ba.chooosetoday/#scrollTo=sk04zb7j4eerb9fh7xmrhy>. We note here also that BA was previously (and may still be) partnered with ‘pureleapfrog’, on whose website it is stated: “SAF has been shown to provide significant reductions in overall CO2 lifecycle emissions compared to fossil fuels, and for waste-derived fuels these can be more than 90%” (https://www.pureleapfrog.org/ba/carbon_neutral-faqs/)

¹⁴ www.reuters.com/business/sustainable-business/british-airways-owner-iag-makes-sustainable-fuel-commitment-2021-04-22/

from the manufacturing process to permanently remove it from the atmosphere".¹⁵

¹⁵ <https://mediacentre.britishairways.com/factsheets/details/86/Factsheets-3/217?category=1>