

## Appendix A - Virgin

### Table of the Relevant Statements and alleged breaches

Statement	OECD Guideline and/or other codes breached
<b>Misleading claims about reducing emissions</b>	
<p><i>“Because of new, more efficient aircraft, since 2007 we’ve reduced... our total emissions by 21%.”<sup>1</sup></i></p> <p><i>“over the last decade [...] our absolute carbon emissions have reduced from 4.75m metric tons (MT) of CO2 to just over 3m MT CO2 in 2022, an improvement of 35%”<sup>2</sup></i></p> <p>‘Mission to net zero’ timeline featured prominently on Virgin’s website<sup>3</sup> and in its 2022 Annual Report which provides misleading, incomplete and confusing information about its historical and future emissions reductions</p>	<p>OECD Chapter VI, para 1(d)            OECD Chapter VI, para 5(c)            OECD Chapter VIII, para 2            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>
<b>Misleading claims about efficiency</b>	
<p>‘Mission to net zero’ timeline featured prominently on Virgin’s website<sup>4</sup> and in its 2022 Annual Report which provides misleading, incomplete and confusing information about its efficiency achievements</p>	<p>OECD Chapter VI, para 1(d)            OECD Chapter VI, para 5(c)            OECD Chapter VIII, para 2, read with para 97            OECD Chapter VIII, para 4</p>

<sup>1</sup> [https://corporate.virginatlantic.com/content/dam/corporate/FINAL\\_Virgin\\_Sustainability\\_Report\\_2019%20LR.PDF](https://corporate.virginatlantic.com/content/dam/corporate/FINAL_Virgin_Sustainability_Report_2019%20LR.PDF)

<sup>2</sup> [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022\\_F.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022_F.pdf), p.42

<sup>3</sup> <https://corporate.virginatlantic.com/global/en/business-for-good/planet/carbon.html>

<sup>4</sup> <https://corporate.virginatlantic.com/global/en/business-for-good/planet/carbon.html>

*“Because of new, more efficient aircraft, since 2007 we’ve reduced our CO2 per revenue tonne-km (our efficiency metric) by 18.1%”<sup>5</sup>*

*“18% reduction in CO2 per revenue tonne kilometre vs 2007”<sup>6</sup>*

*“2022 performance representing a further 4% improvement against 2019”<sup>7</sup>*

*“our carbon efficiency (CO2/ASK) has improved by 20% over the last decade”<sup>8</sup>*

*“We operate one of the youngest and most fuel-efficient fleets in the sky with 70% next generation aircraft and an average age of less than seven years.”<sup>9</sup>*

*“We are already one of the most carbon efficient long-haul airlines. Operating one of the youngest and cleanest twin-engine fleets in the skies. At the end of 2021 our average aircraft age across the fleet was just under seven years and 68% next generation. This increases to 100% next generation by the beginning of 2027. This means our aircraft are equipped with the most efficient engines and state-of-the-art technology designed to save fuel and reduce emissions.”<sup>10</sup>*

CAP Code Rule 11.7

CMA Guidance paragraph 3.41

ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11

<sup>5</sup> [https://corporate.virginatlantic.com/content/dam/corporate/FINAL\\_Virgin\\_Sustainability\\_Report\\_2019%20LR.PDF](https://corporate.virginatlantic.com/content/dam/corporate/FINAL_Virgin_Sustainability_Report_2019%20LR.PDF)

<sup>6</sup> [https://corporate.virginatlantic.com/content/dam/corporate/2021%20AR\\_Sustainability%20pages.pdf](https://corporate.virginatlantic.com/content/dam/corporate/2021%20AR_Sustainability%20pages.pdf), p.3

<sup>7</sup> [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022\\_F.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022_F.pdf), p.72

<sup>8</sup> [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022\\_F.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022_F.pdf), p.42

<https://corporate.virginatlantic.com/gb/en/business-for-good/planet/carbon/fleet.html#:~:text=Fleet%20transformation&text=%F0%9F%8F%86%20We%20operate%20one%20of,50%25%20reduction%20in%20airp ort%20noise.>

<sup>10</sup> [https://corporate.virginatlantic.com/content/dam/corporate/2021%20AR\\_Sustainability%20pages.pdf](https://corporate.virginatlantic.com/content/dam/corporate/2021%20AR_Sustainability%20pages.pdf), p.40

*“we operate one of the youngest and most efficient fleets across the Atlantic. 70% next generation, with an average fleet age of seven years compared to a competitor average of 13. In the last decade, we have reduced our absolute carbon emissions by 35%. And by 2027, once all of our 16 A330neos arrive, we will be 100% next generation emitting 18% less CO2 per revenue tonne km than we did ten years ago, despite growing our capacity by 18%.”<sup>11</sup>*

*“the biggest difference we can make right now on our mission to net zero .... We’re continuing to grow our fleet with next generation aircraft that burn less fuel [and] produce lower CO2 emissions”.<sup>12</sup>*

**Misleading claims about alternative fuels**

‘Mission to net zero’ timeline featured prominently on Virgin’s website<sup>13</sup> and in its 2022 Annual Report which provides misleading, incomplete and confusing information about the impact of the use of alternatives fuels

*“2030: 10% of fuel consumption from sustainable aviation fuel”<sup>14</sup>*

*“These fuels are produced using a range of sustainable feedstocks - ranging from used cooking oil, non-food crops, biomass waste and industrial waste gasses from processes such as steel making.*

OECD Chapter VI, Paragraph 1(d)  
 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

<sup>11</sup> [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022\\_F.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022_F.pdf), p.12

<sup>12</sup> <https://www.youtube.com/watch?v=xdY7Uti-84U>

<sup>13</sup> <https://corporate.virginatlantic.com/global/en/business-for-good/planet/carbon.html>

<sup>14</sup> <https://corporate.virginatlantic.com/global/en/business-for-good/planet/carbon.html>

<p><i>“They’re proven to safely and effectively power aircraft, potentially reducing lifecycle carbon emissions by up to 70% or more, in comparison to fossil fuel-based typical aviation fuel.”<sup>15</sup></i></p> <p>Claims of reductions in emissions from use of alternative fuels, citing <i>“up to 80%”<sup>16</sup></i> and <i>“capable of reducing the lifecycle carbon impact of aviation fuel by more than 75%”<sup>17</sup></i></p> <p><i>“SAF includes alternative next generation fuels produced from sustainable feedstocks (ranging from waste fatty acids and oils, to recycled biomass, recycled plastic and captured carbon)”<sup>18</sup></i></p> <p><i>“sustainable feedstocks - ranging from used cooking oil, non-food crops, biomass waste and industrial waste gasses from processes such as steel making.”<sup>19</sup></i></p>	
<p><b>Misleading claims about net zero pathway</b></p>	
<p>‘Mission to net zero’ timeline featured prominently on Virgin’s website<sup>20</sup> and in its 2022 Annual Report which provides misleading, incomplete and confusing information about Virgin’s pathway to net zero in 2050, including as to whether it is achievable</p> <p><i>“The airline’s new targets set a clear pathway to net zero by 2050, to</i></p>	<p>OECD Chapter VI, para 5(c)  OECD Chapter VIII, para 2, read with para 97  OECD Chapter VIII, para 4</p> <p>CAP Code Rule 11.7  CMA Guidance paragraph 3.41</p>

<sup>15</sup> <https://corporate.virginatlantic.com/gb/en/business-for-good/planet/carbon/sustainable-aviation-fuel.html>

<sup>16</sup> <https://corporate.virginatlantic.com/gb/en/media/press-releases/virgin-atlantic-agrees-sustainable-aviation-fuel-supply.html>

<sup>17</sup> <https://corporate.virginatlantic.com/gb/en/media/press-releases/our-mission-to-net-zero-by-2050.html#:~:text=Building%20a%20strong%20domestic%20SAF,traditional%20jet%20fuel%5B1%5D.>

<sup>18</sup> [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202021\\_c\\_ompressed.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202021_c_ompressed.pdf)

<sup>19</sup> <https://corporate.virginatlantic.com/gb/en/business-for-good/planet/carbon/sustainable-aviation-fuel.html>

<sup>20</sup> <https://corporate.virginatlantic.com/global/en/business-for-good/planet/carbon.html>

<p>achieve:</p> <ul style="list-style-type: none"> <li>• <i>By 2026: 15% gross reduction in CO<sub>2</sub>/RTK achieved through continued fleet transformation and operational efficiency</i></li> <li>• <i>By 2030: 15% net reduction in total CO<sub>2</sub> emissions, including 10% of fuel sourced from sustainable aviation fuel</i></li> <li>• <i>By 2040: 40% net reduction in total CO<sub>2</sub> emissions”<sup>21</sup></i></li> </ul> <p><i>“Carbon offsets are a recognised and verifiable way to compensate for unavoidable emissions through the investment in carbon reduction and removal projects such as reforestation, renewable energy and carbon removal technology like Direct Air Capture. Offsets will play a supporting role in helping us to achieve our net zero by 2050 goal. We are committed to only investing in high quality and Gold Standard offsets to guarantee credible reductions.”<sup>22</sup></i></p> <p><i>“Working in partnership with industry pioneers Carbon Engineering”, stated in relation to the DAC facility without providing full explanation<sup>23</sup></i></p> <p><i>“responsible travel is a mindset. Begin by understanding that travel is intrinsically good... we shouldn’t stop travelling... we should all do a bit more to reduce our impact”.<sup>24</sup></i></p>	<p>ICC Framework for Responsible Environmental Marketing Communications 2019, p. 11</p>
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<sup>21</sup> <https://corporate.virginatlantic.com/gb/en/media/press-releases/our-mission-to-net-zero-by-2050.html> , with the timeline being repeated in Virgin’s 2022 Annual report at [https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022\\_F.pdf](https://corporate.virginatlantic.com/content/dam/corporate/Virgin%20Atlantic%20Annual%20Report%202022_F.pdf)

<sup>22</sup> <https://corporate.virginatlantic.com/gb/en/business-for-good/planet/carbon/offsetting-our-emissions.html>

<sup>23</sup> <https://corporate.virginatlantic.com/gb/en/business-for-good/planet/carbon/offsetting-our-emissions.html>

<sup>24</sup> [www.virginatlantic.com/gb/en/blog/OurFuture/responsibletravel.html#:~:text=If%20all%20our%20passengers%20reduced,of%20around%201%2C500%20average%20cars](http://www.virginatlantic.com/gb/en/blog/OurFuture/responsibletravel.html#:~:text=If%20all%20our%20passengers%20reduced,of%20around%201%2C500%20average%20cars)