



BT4Europe



# Position Paper on Sustainability in Business Travel

# Businesses want to travel sustainably

Knowledge & Self-understanding are the Keys to Change

CO<sub>2</sub> Footprint of business travel services to become equally important as price

CO<sub>2</sub> Reports for business travel services to become a customer right

Standard mechanism to calculate the emissions of business travel in a generic way



## Introduction

### Executive Summary

**Business travel buyers across Europe accept their responsibility to reduce greenhouse gas emissions. It is our clear intention to contribute to 'Fit for 55'.** Should business travel stand a chance of contributing its fair share to the EU's target of reducing net greenhouse gas emissions by at least 55% by 2030, known as the "Fit for 55 package"<sup>1</sup>, and the goal of climate neutrality by 2050, in line with the European Green Deal<sup>2</sup>, significant steps in improving the access to streamlined, accurate and comparable data on travel services' CO<sub>2</sub> emissions is urgently needed. Therefore, the European business travel industry as a whole and the European business travel manager communities (represented in BT4Europe) in particular, have identified a set of common data challenges, which if not addressed and legislated for where necessary, will compromise and slow down the CO<sub>2</sub> reduction capabilities of the business travel ecosystem, prejudice the green transformation of the sector, and ultimately jeopardize the EU's 2030 and 2050 targets. Awareness of the carbon impact of business travel is the key to change.

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<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0550>  
[https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en)

# Executive Summary

We make the following recommendations for action to enable the business to make fact-based decisions on their environmental impact and invite the entire travel sector to support these recommendations and the European Union (EU) to implement them:

- We urge the EU to ensure rail transportation options are fully integrated into all booking and reservation systems for business travel, without any cross-border ticketing restrictions.
- We urge the EU governing bodies to put pressure on travel service providers and if necessary, legislate upon, making the delivery of CO<sub>2</sub> emission data reports for purchased travel services obligatory, provided free of charge for all corporate customers.
- We urge the EU to ensure sufficient financial support is provided to the business travel industry, which is essential to realize the necessary investments in the digital solutions, required to provide the CO<sub>2</sub> data.
- We urge the EU to continue expanding the scope of companies under corporate sustainability reporting (CSRD) obligations, on sustainability practices, CO<sub>2</sub> footprint, and environmental targets.
- We urge the EU to adopt a reporting standard for the environmental data on employee commuting and require its inclusion in Non-Financial Reporting, which is freely accessible to the public.
- We urge the EU to widen the scope of the 'CountEmissions' EU initiative with the objective to explicitly include business travel to travel services. Together with the availability of CO<sub>2</sub> data, a reliable comparison is also essential. Therefore, we urge the EU to:
  - Create a standard for CO<sub>2</sub> emissions calculation methodology for business travel services (air, rail, hotel<sup>3</sup>, ground transportation, etc.) and start immediately with a concise standard on CO<sub>2</sub> emission reporting for air and rail traffic. A solution for a standard in the hotel area delivers the Sustainable Hospitality Alliance.
  - Develop a uniform standard for recording the CO<sub>2</sub> values according to GHG Protocol Scope 3<sup>4</sup> in Europe.
  - Make digital recording/determination of the footprint as a basis for compensation.
  - Determine uniform rules and legislation on a framework for the EU which obliges all travel service suppliers to provide free of charge standardized CO<sub>2</sub> calculation basis and the respective CO<sub>2</sub> emissions in digital form for companies of all sizes. Such a baseline will be a starting point for adopting strategic initiatives for CO<sub>2</sub> reductions and supporting corporate environmentalism.

3. Sustainable Hospitality Alliance - <https://sustainablehospitalityalliance.org/> (2022)

4. Greenhouse Gas Protocol - <https://ghgprotocol.org/standards/scope-3-standard>, 2022

## Introduction

Transport and travel make up a significant part of European CO<sub>2</sub> emissions. As the European Commission have stated *'Given its high proportion of total EU greenhouse gas emissions, the EU's goal of at least -55% greenhouse gas reduction target by 2030 and of climate neutrality by 2050 will be reached, only by introducing more ambitious policies to reduce transport's reliance on fossil fuels without delay and in synergy with zero pollution efforts. The success of the European Green Deal depends on our ability to make the transport system sustainable.'*<sup>5</sup>

Business travel makes up a significant share of the total EU greenhouse gas emissions; however, no one knows quite how much. There is no reliable data on the exact amount. It is currently not available at macro nor at micro level. The scarce micro level data is often inconsistent, hard to find and lacks comparability.

We believe that to properly tackle the challenge of the greening of business travel we first need to fully measure and assess the amount of CO<sub>2</sub> emissions caused by business travel. To do so, it is paramount that travel service providers provide streamlined, accurate and comparable data on travel services' CO<sub>2</sub> emissions

In this Position Paper we set out these data challenges, assess how they should be addressed and make recommendations for action. We invite the entire travel sector to support these recommendations and the EU to take action to implement them.



5. Communication from the European Commission - Sustainable and Smart Mobility Strategy – putting European transport on track for the future, 2022

# 1. CO2 Footprint in Travel to become equally important as Price

Historically, cost and pricing have been one of the cornerstones that business travel programs have been designed to optimize for. Therefore, it is no surprise that today still a large portion of corporate trips are purchased primarily based on their financial value. Organizations and business travelers need to factor the CO2 footprint of a given travel service (be that accommodation or any type of transportation) in the decision-making process, at the point of sale.

## Visibility of travel services' differentiated CO2 footprint at the point of sale

The incumbent technological platforms for the online booking of business travel (known as online booking tools) lack the capability to show either differentiated nor non-differentiated CO2 emission for a given travel service and thus do not allow any comparison of CO2 footprint and choice of more sustainable options at the point of sale. This is a challenge that business travelers, travel managers, and travel agents face at present.

## Without the right visibility for CO2 emission

Travel Managers have little to no levers to implement in the Online Booking Tools' policy compliance elements related to emissions reduction. Further to that, the application of nudging and behavioral change techniques toward business travelers is strongly diminished to become almost non-existent. We need global data formats, equal to the EU formats, implemented in the Online Booking Tools on the market.

Corporate Travelers, on the other hand, have difficulties evaluating the real CO2 footprint for different travel options as the data it is either missing (e.g. hotels) or a standardized value (as averages or reference values) based on average numbers (rail, air), which does not take into account transport attributes that can greatly impact CO2 (i.e. fleet specifications, load factors, fuel type, fuel efficiency, etc.).

Travel agents cannot offer more environmentally friendly travel options, as either the CO2 footprint is unknown (accommodation, certain mobility services) or in the case of flights and rail, CO2 average reference values apply for a given route irrespective of carrier and any additional attributes that may influence the emissions for given service.

It is of utmost importance that a European and ideally global standard for differentiated CO2 emission calculation for different transportation and accommodation services, covering the full door-to-door trip is agreed upon and adopted in the shortest possible timeframes. Until such standards fall into place, there is a need for enforcement of CO2 footprint and CO2 calculation methodology visibility in travel agents' quotes as well as during individual trip searches in Online Booking Tools.

As an immediate remedy air and rail traffic should be given reporting priority. Coherent reporting standards need to be enforced across industry service providers (airlines and rail companies) in Europe. A first step is CO2 reporting subsequently followed by more elaborate reporting solution on environmental footprint.

## **Travel distribution and booking systems shall include all means of transportation**

To make business travel more sustainable, the environmental impact of each travel booking shall be visible at the point of sale. Referring to the proposal to revise the TEN-T guidelines, and the Action Plan to boost rail, there is a clear EU objective of seeking to boost long-distance and cross-border passenger rail services and the necessary infrastructure. In addition, action must be taken to provide information on the available rail routes, also the reservation possibility of the train tickets requires a comprehensive integration of the rail fares in Online Booking Tools. In many European countries, rail connection and tickets are only accessible on proprietary rail platforms.

Business travelers can significantly contribute to and benefit from the achievement of more sustainable mobility across Europe by making greater use of the developing network of long-distance and cross-border railways, but not until they are fully available and integrated into the Online Booking Tools.

The booking tools available on the market primarily allow for air travel, accommodation and rental car reservations but very seldom include rail as an alternative, and if they do, the rail operators often do not allow for cross-border ticketing, limiting the rail booking capability only to travelers from the rail operator's domestic market.

Bearing in mind, that the comparison of ways of transportation, connections/schedules, price and CO2 emissions is currently extremely time consuming and, in some cases, impossible to perform in the travel tools, the much-needed awareness, access and practicability around the choice of sustainable transportation options at the point of sale will fail.

We urge the EU to ensure rail transportation options are fully integrated into all reservation systems for business travel, without any cross-border ticketing restrictions. The initiative for Multimodal Digital Mobility Services<sup>8</sup> would significantly support the greening of business travel, making the European terrain connections (all type of ground transportation) better accessible.

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6. European Commission 2021 - <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2021%3A812%3AFIN>

7. European Commission 2021 - Communication from the Commission to the European Parliament and the Council: Action plan to boost long distance and cross-border passenger rail (COM(2021) 810)

8. EUR LEX 2021 - Initiative Multimodal Digital Mobility Services (EUR-Lex - Ares(2021)6062336 - EN - EUR-Lex (europa.eu))

## 2. CO2 Reports for travel services to become a customer right

### **CO2 emissions reports – obligatory for all travel service providers and free of charge for corporate clients**

Data for CO2 emissions from corporate travel is a prerequisite for the transformation effort to build more sustainable business travel practices. However, obtaining CO2 emissions data for the purchased travel services is not as straightforward as it should be for corporate clients. While some travel service providers and travel agencies offer CO2 emissions data for flights as a standard value and free-of-charge emission reports to their corporate clients, other travel service providers treat this as a chargeable service of a consultancy character. The differences in practice vary largely across Europe and service providers.

We urge the EU to put pressure on travel service providers and if necessary, legislate, making the delivery of CO2 emission data reports for purchased travel services obligatory and free of charge for all corporate customers. Given that the recovery from COVID19 is still ongoing, and the financial power of the travel industry is still weak, we urge the European Union to ensure sufficient financial support is provided, which is essential to realize the necessary investments in the digital solutions, required to provide accurate and timely CO2 data.

### **Non-Financial Reporting for all companies**

Whilst the European Commission proposal for a revised corporate sustainability reporting Directive (CSRD)<sup>9</sup> from April last year shows a strong commitment to extending the scope of companies to the Non-financial Reporting Directive<sup>10</sup> applies, it is still insufficient to incentivize organizations of all sizes to uniformly report on sustainability practices, CO2 footprint, and environmental targets, particularly regarding business travel emissions. Access to reliable detailed and quality CO2 emissions data from business travel service providers is urgently needed.



This will greatly facilitate travel managers in their efforts to outline and document the emissions generated by business travel activities across the entire value chain of travel services providers.

We commend the EU for expanding the scope of companies under CSRD obligations, on sustainability practices, CO<sub>2</sub> footprint, and environmental targets from large undertakings to also include small and medium undertakings<sup>11</sup>. The expanded CSRD obligations are to be enforced through a phased implementation and simplified reporting approach for small and medium undertakings. However, we believe that the reporting obligations for small and medium undertakings should progressively transition from simplified reporting to a sustainability reporting threshold of obligations expandable to that applied to large undertakings. When it comes to the information requirements for sustainability reporting within the scope of the CSRD, we commend the inclusion of actual and potential impacts connected with the undertaking's supply chain<sup>12</sup>, but call for specific requirements to report on business travel CO<sub>2</sub> information.

## Commuting in Non-Financial Reporting

About the EU's Sustainability Reporting Standards, the question of employee commuting in the context of business travel needs to be addressed. Currently, business travel CO<sub>2</sub> emissions data (as outlined above) is difficult to obtain from the travel service providers (agencies, transportation, and accommodation actors) in sufficient quality and without a surcharge. In particular, the companies rarely have any information on how their employees travel from home to their workplace, as this is often counted as commuting work-related, and not seen as part of a business trip. In some countries, work-related commuting is covered by tax legislation aligned to labor conditions, and therefore seen as part of the labor agreement. Data protection questions also arise, as to whether companies are allowed to ask, or if employees can be obliged to declare, how they travel to the workplace. However, it is clear that from an environmental perspective, the employee's declaration should be obligatory because it is likely to constitute a sizeable proportion of business travel.

We urge the EU to require the reporting of employee commuting data in Non-Financial Reporting, in a free, accessible, and comparable standard.

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9. European Commission 2021: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0188>

10. 'On 21 April 2021, the Commission presented its proposal for a Corporate Sustainability Reporting Directive (CSRD), which aims to revise and strengthen the existing rules introduced by the Non-Financial Reporting Directive (NFRD). On 21 June 2022, following the negotiations in the trilogues, the Parliament and the Council reached a provisional political agreement. The CSRD will extend the current sustainability reporting requirements in the EU (namely those under the Non-Financial Reporting Directive (NFRD), to include more companies and topics and to require more detailed disclosures. Under the terms of the agreed text, the Commission will adopt delegated acts in accordance with Article 49 to provide for the detailed sustainability reporting standards proportionate and relevant to the scale and complexity of the activities, and to the capacities and characteristics of small and medium-sized undertakings at the latest by 30 June 2024

11. As defined in Article 3, Directive 2013/34/EU. European Commission 2021: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32013L0034&qid=1661776920077>

12. As defined in Article 19a(2) e of the CSRD Directive

### 3. Standard mechanism to calculate the emissions in a generic way

The business and tourism industry is and always has been a complex, isolated and fragmented sector. Many actors with different interests are involved and the mix of business and leisure makes the issue of standardization of emissions data measurement challenging, as the CO<sub>2</sub> reporting, sustainability and environmental obligations of corporations traveling for business are not the same as those in place on individual leisure travelers.

In the absence of any European or international standards and methodologies, several organizations, private and NGO organizations, have taken up this lack of standardization and started to develop their methodologies. As a result, there are numerous company-, project- and country-specific initiatives, but on closer inspection, as of June 2022, we have multiple methodologies and no standards. Given the lack of uniformity an EU or global 'standard' is needed to enable transparency and improve the quality of CO<sub>2</sub> data for business travel in Non-Financial Reports.

Following the example of the European Commission initiative "CountEmissions EU" to set a European standard for calculating and reporting transport emissions<sup>13</sup>, a calculation standard for all types of travel services is equally required. The actual proposal is expected to be published in the fourth quarter of Q4 2022.

The initiative is designed to encourage the transport sector to track and reduce its emissions by creating a common framework for calculating GHG emissions of transport operations in both freight and passenger applications. More specifically, the initiative aims to improve the environmental impact of transport through the following objectives:

<p>Providing a single EU framework for calculating GHG emissions data of transport operations.</p>	<p>Making available and comparable information on the GHG information on the GHG intensity of individual transport services.</p>	<p>Facilitating the uptake of GHG emissions accounting business practices.</p>
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As a part of the consultation, the Commission is considering the design of future methodology, namely the scope, reliability, consistency, acceptability, applicability, level of detail with regards to emissions data, calculation boundaries, and the geographical scope (EU vs globally recognized standards). To implement this initiative, the European Commission is considering a range of possible approaches from non-binding guidelines to binding legislative measures.

We urge the EU to widen the scope of the 'CountEmissions' EU initiative to include all types of travel services, explicitly including **business travel**.

Together with the availability of CO2 data, a reliable comparison is also essential. Therefore, we urge the EU to:

Create a standard for CO2 emissions calculation methodology for business travel services (air, rail, hotel<sup>14</sup>, ground transportation, etc.) and start immediately with a concise standard on CO2 emission reporting for air and rail traffic. A solution for a standard in hotel area delivers the Sustainable Hospitality Alliance.

Make digital recording/determination of the footprint as a basis for compensation.

Develop a uniform standard for recording the CO2 values according to GHG Protocol Scope 3<sup>15</sup> in Europe.

Determine uniform rules and legislation on a framework for the EU which obliges all travel service suppliers to provide free-of-charge standardized CO2 calculation basis and the respective CO2 emissions in digital form for companies of all sizes. Such a baseline will be a starting point for adopting strategic initiatives for CO2 reductions and supporting corporate environmentalism.

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13. EU Commission - [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13217-Count-your-transport-emissions-CountEmissions-EU\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13217-Count-your-transport-emissions-CountEmissions-EU_en), 2022

14. Sustainable Hospitality Alliance - <https://sustainablehospitalityalliance.org/> (2022)

15. Greenhouse Gas Protocol - <https://ghgprotocol.org/standards/scope-3-standard>, 2022

# About Us

We are the European Network of Business Travel Associations, and we call ourselves

## BT4Europe Business Travel for Europe for short.

Across Europe business travel is of vital importance to businesses, public institutions, and NGOs. We are the voice of those who buy business travel services and those who travel. The European Network of Business Travel Associations is registered in Belgium as a non-profit association.

The Executive Board is elected by the Annual General Meeting and consists of a Chair, a Treasurer and a Secretary.

Chair

**Patrick Diemer**  
VDR

Treasurer

**Dominic Short**  
ASTM

Secretary

**Lotten Fowler**  
SBTA

BT4Europe has formed 4 working groups initially. These focus on Facts & Figures, Restart from Covid-19, Sustainability and Digital Transformation.

### Participants:

 <b>ABTA</b> Austrian Business Travel Association Angela Lille Austria, ABTA	 <b>BATM</b> Belgian Association of Travel Management Pascal Struve Belgium, BATM	 <b>DBTA</b> Danish Business Travel Association Anne Mette Berg Denmark, DBTA	 <b>fbta</b> Finnish Business Travel Association Sari Vijamaa Finland, FBTA	 <b>AFTM</b> Association of French Travel Managers Claude Lelièvre France, AFTM	 <b>VDR</b> Verband Deutsche ReiseManagement e.V. Hans-Ingo Biehl Germany, VDR	 <b>AITMM</b> Associazione Italiana Travel Management Rosemarie Caglia Italy, AITMM
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