

# A TOOLKIT TO STOP GREENWASHED AIRLINE ADVERTISING

HELP US TO STOP THE AVIATION INDUSTRY IN  
PROMOTING THEIR GREEN LIES

**Green Flying is an illusion!** And advertising that promotes “responsible” flying or so-called “sustainable” aviation fuels is misleading and **illegal** greenwashing

## ACTION 1:

Find  
Misleading  
ads

Watch out for misleading advertisements by aviation industry and take a picture!!

## ACTION 2:

Spread the  
word

Send us your picture of the misleading advertisement and your action, so we can promote it via our public channels (you can also do this via your own social media channels and tag us!

## ACTION 3:

Report to  
consumer  
regulations  
bodies

Write to your national consumer regulation body. Tell them you heard about their investigation and you want to report a case of an airline floating rules by continuing to promote misleading claims.

## ACTION 4:

Complaint to  
advertising  
watchdog

If you have a bit more time - hand in an official complaint to your national advertising watchdog, to get the advertisement banned.

Advertisements about “responsible” flying or so-called “sustainable” aviation fuels are one important way the aviation industry promotes the illusion of green flying and misleads the public about their (non-existent) contribution to CO2 reduction goals. But this practice is increasingly being challenged. In 2022 Reclame Fossilvrij (Fossil free Advertising) and Fossilvrij Netherlands, supported by ClientEarth, filed a lawsuit against KLM. KLM had launched [a new marketing campaign, claiming that](#) “with KLM, you’re on your way to a more sustainable future.” What’s more, KLM pretended you could offset your flight’s emissions by planting trees. After a [long process](#), on 20 March 2023 the judge ruled in their favour:

a [historic victory!](#)

In April, the European Commission, together with national consumer regulators, [sent letters](#) to 20 airlines over their own misleading green claims, giving them a 30-day deadline to end their misleading claims and respond. This deadline has long passed, but we still see many airlines greenwashing. We want to remind the national regulators to take action against this greenwashing and issue fines to the airlines.

We’re seeing wins! In the past few months and years we have witnessed a number of bans of misleading airline advertisements by national advertising watchdogs.

## ACTION 1: FIND MISLEADING ADS

Watch out for advertisements by airlines, airports or aircraft manufacturers, that include elements about the potential sustainability of flying using wording like “sustainable aviation fuels”, “green”, “responsibility” or pictures that suggest you can contribute to climate protection by using the promoted product. Also ads on offsetting, or promises around net zero

targets are clear indicators for greenwashing.

You can find a detailed description on which adverts and wordings are officially labelled as greenwashing by courts and advertising watchdogs under Step 4.

Take a picture of the advertisement and where it’s located.

## ACTION 2: SPREAD THE WORD

Send us your picture of the misleading advertisement and share it via Social Media. To spread the word about the misleading greenwashing of the aviation industry and make a strong case for a reduction of aviation to bring down emissions, we are calling on everyone to publicly report all the greenwashing they can find. You can send us your example of misleading ads via email ([hannah\[at\]stay-grounded.org](mailto:hannah[at]stay-grounded.org)) or via social media (@staygroundednet) and post it via your own channels.

Hashtags you can use for this are e.g.:

- #banfossilads
- #stopgreenwashing
- #staygrounded

If you have any questions or want to discuss the ads you found - please get in touch with us!

## ACTION 3: REPORT TO CONSUMER REGULATION BODIES

In April 2024, the European Commission, together with national consumer regulators, [sent letters](#) to 20 airlines over their own misleading green claims, giving them a 30-day deadline to end their misleading claims and respond. This deadline has long passed, but we still see many airlines greenwashing. We want to remind the national regulators to take action against this greenwashing and issue fines to the airlines. We also want to encourage the regulators to put strong rules on advertisements, ideally banning all fossil advertising as recently [done by the city of The Hague](#).

We expect to see high level lobbying by airlines to prevent stronger regulations against their advertising.

To put pressure on the regulators and remind them to take action, you can send a letter to your national regulator. The more remarks they get, the more difficult it will be to ignore the issue or give in to the industry's lobbying.

Find here a [list of national regulators](#) and below a template for a letter you can send.

You might not receive a direct answer, but you can share your action with us on social media or via email and we will spread the word about it and report to the international press. (See step 2).

## TEMPLATE LETTER TO REGULATOR:

Dear **[NAME]**,

I have seen that European regulators and the European Commission have warned airlines to remove misleading advertisements within 30 days of 30 April 2024. This is very important and I want to thank you for taking this important step.

However, I have noticed that **[NAME AIRLINE]** is still using misleading statements that amount to greenwashing in their advertisements. This is irresponsible and leaves consumers open to disinformation. I have attached those advertisements to this e-mail.

**[OPTIONAL]** The advertisements use the following text and images: **[ADD TEXT AND DESCRIPTION OF IMAGES]**. This is clearly misleading. **[ADD DETAIL ON WHY IF YOU CAN]**.

I urge you to take appropriate measures against these airlines. Flying is the most polluting mode of transport and there are no solutions to reduce emissions that would work at the scale of current flight levels, to present any as such is misleading and serves as greenwashing. Consumers deserve truthful information on the impact of aviation and on where and how they spend their money.

Kind regards,

## ACTION 4: COMPLAINT TO WATCHDOGS

Many countries have advertising watchdogs. These watchdogs are often created by the industry itself, and are self-regulatory. People can file a complaint when they see an advertisement that is misleading. While these advertising watchdogs cannot impose fines and sometimes lack transparency due to their relation to the industry, their decisions can be important in changing the norms in what is greenwashing.

Here is how you can file a complaint in 5 steps.

1. Find the Advertising Watchdog in your country [in this list](#), and check if/how you can file a complaint.
2. Write a letter to your advertising watchdog, where you
  - Describe the ad

3. Explain why you find this ad misleading
3. You can strengthen your letter by
  - Referring to international examples, where courts or watchdogs took similar decisions
  - Describing which laws or which advertising code was broken. Check out the background information below for help on this.
  - Make a post about it on social media. Your complaint can be an inspiration for other individuals or groups. (see step 2)
4. Reach out to media journalists and tell them that you have filed this complaint. You can keep them updated.

## Background Information on Greenwashing Practices

If you see an airline ad that you find misleading, it is worth filing a complaint at your national Advertising Watchdog. When you file a complaint it is much more likely to be taken up and actually result in a ban, if from the beginning you argue well and based on previous cases and scientific numbers. This document aims to clarify what to look out for and what other regulators, courts and advertising watchdogs have decided, to help you in your complaint.

It is important to know that countries have their own advertising laws, and it is worthwhile to look into these laws, to find out the rules companies should adhere to. These rules are based on a European directive that aims to protect consumers from unfair practices from

businesses, such as misleading advertisements. More information can be found in the [Unfair Commercial Practice Directive](#), and in [the European Commission's guidance on this directive](#). Each EU-country implemented this directive in their own consumer protection laws. [New EU-laws](#) on greenwashing will be implemented in the near future as well. In addition, each country has its own advertising watchdogs with their own codes, based on these laws. A list of advertising watchdogs can be found [here](#).

The following wordings and claims have previously been identified as misleading and therefore greenwashing.

### 1 A Promising Future

*Look out for claims in which an airline claims to be on a path to a sustainable future / to be Paris aligned / to be aiming for net zero by 2050 / or caring for the future*

Many airlines are making vague claims about being sustainable or becoming sustainable. Yet the solutions to decarbonise are not there yet, and all airlines still intend to grow. Their absolute emissions are constantly rising due to this growth. Hence, it is misleading when an airline brags about its climate plans, while its business and growth plans are still heating the planet.

[Look for more information at the greenwashing fact sheet on Net Zero](#)

*What should you look out for?*

Look out for texts and pictures, in which an airline presents itself as taking care of the environment. Often pictures of beautiful nature or children are used, and vague slogans like "protecting the future", "fly responsibly", "on our way to a sustainable future".

Also take a good look when an airline says that it is committed to the Paris Agreement, and suggests it has climate goals that are aligned with it. If an airline is truly committed to reaching the goals of the Paris Agreement, it should also reduce its absolute emissions rapidly. Some airlines say that their climate targets are approved by the Science Based Target Initiative, hence they are aligned with the Paris Agreement. However, the pathways for SBTi are flawed. See [this letter](#) for more information.

*Examples of advertisements that have been declared as misleading:*



*What do judges, regulators and advertising watch dogs say about these statements?*

[According to the District Court of Amsterdam \(Netherlands\)](#) in March 2024 it is misleading for KLM to say that consumers flying with them "are on their way to a more sustainable future", while it is "not clear whether, and if so how, flying with KLM contributes to that". The judge says this claim by KLM is too vague and general.

The Dutch judges also said that as KLM makes statements that it is committed to the targets of the Paris Climate Agreement, consumers can rightfully expect KLM's own targets to also be in line with Paris. In Court, KLM claimed that there is a clear difference between these two things: that they can be committed to Paris and not acting aligned accordingly. However, the judge rejected this reasoning: consumers will think that KLM is actually acting in line with the Paris target itself.

Also a Lufthansa advertisement, that used the slogan "Connecting the world. Protecting its future" was deemed misleading by the UK watchdog ASA in March 2023. According to ASA the [#MakeChangeFly](#) campaign was "likely to be understood by consumers to mean that Lufthansa had already taken significant mitigating steps to ensure that the net environmental impact of their business was not harmful."

[According to ASA:](#) "We understood that air travel produced high levels of both CO2 and non-CO2 emissions, which were making a substantial contribution to climate change. We noted the initiatives and targets Lufthansa said they were committed to delivering in pursuit of their stated goal, but many of these initiatives were targeted to deliver results only years or decades into the future."

We also understood that there were currently no environmental initiatives or commercially viable technologies in the aviation industry which would substantiate the absolute green claim "PROTECTING ITS FUTURE", as we considered consumers would interpret it."

Hence, ASA concluded this ad was misleading.

[Shell was also reprimanded](#) in the Netherlands by the Dutch Advertising Watchdog RCC in March 2024 for the slogan: "We are changing for a cleaner future". The committee also called statements that cannot be substantiated misleading and a prohibited form of business operation.

## 2 Planting Trees

*Look out for claims in which an airline or airport argues that emissions from a flight can be neutralised, reduced, compensated or offset through paying for carbon credits.*

Many airlines use and advertise carbon offsetting, thereby saying that the emissions of a flight can be undone. A carbon offset is a 'unit' of greenhouse gas (GHG) emissions that is (allegedly) reduced, avoided, or removed from the atmosphere by one entity and purchased by another entity to try and compensate for its own emissions. However, the damage from your flight cannot be undone or reduced if you plant a tree in return.

Claims of 'offsetting' based on these programs are inherently flawed. There is a fundamental difference between the certainty of greenhouse emissions from air

travel versus the uncertainty of a carbon credit project. There is no way to prove that an offset project is additional, permanent, not overestimated, exclusive, and causes no other societal harm. Greenhouse gases remain in the atmosphere for hundreds if not thousands of years, while a carbon credit project has a time span of just a few decades.

In addition to these theoretical flaws, recent studies also paint a worrying picture about the implementation of these programmes. For instance, [90 per cent of carbon credits validated by Verra do not lead to reductions, and in some cases even exacerbate climate change](#). There are also many examples where carbon credit projects lead to land grabbing and human rights violations.

[Look for more information at the greenwashing fact sheet on carbon offsetting](#)

## What should you look out for?

Look out for advertisements and pictures or offers that talk about CO<sub>2</sub>-neutral, carbon neutral, offsetting and all claims in which an airline pretends that the emissions from a flight can be neutralised, reduced, compensated or offset.

Examples of advertisements that have been declared as misleading:



*I'm co2-neutral on my way - you too?*



*Are you going for carbon offset gas?*

## What do judges, regulators and advertising watch dogs say about these statements?

[According to the judge in the KLM-case](#), it is misleading for KLM to imply a direct connection between customers' contributions to reforestation projects and the CO<sub>2</sub> impact of their flight. KLM implied that planting trees "reduced the impact of your flight".

The Court ruled that this cannot be asserted because, for example, it is not clear whether the trees will remain permanently. The court also put a firm red line through the term CO<sub>2</sub>ZERO, which KLM used for this method of CO<sub>2</sub> offsetting. This ruling is not only relevant for KLM but also for all airlines and all those major polluters who pretend that it is possible to "offset" your emissions.

Also Lufthansa [has been found](#) making misleading claims about CO2-neutral flights in Sweden.

In a comparable case, [the Dutch advertising watchdog RCC ruled](#) that Shell advertisements with the claim “CO2 neutral” were misleading. The Advertising Ethical Board said that Shell’s compensation measures will never wipe out the environmental damage of CO2. The damage of CO2 to the climate is certain, while the oil and gas multinational can never guarantee how much and how long forest conservation and planted trees retain CO2 from the air. The Advertising Ethical Board takes into account that Shell makes an absolute environmental claim without being able to substantiate this claim with verifiable and independent sources.

The UK watchdog ASA came to a similar decision.

Subsequently, Shell replaced the word CO2 neutral with the term ‘CO2 compensation’, [which the Dutch Advertising watchdog also deemed misleading](#). [In a third complaint](#), the RCC declared that also the term CO2-compensated gas is misleading.

Also dairy company Arla [has been reprimanded](#) for using the term “net-zero climate footprint” in the marketing of its products. The Patent and Market Court said that these terms give the impression that there is no climate footprint connected to the product, or that this impact has been fully compensated for, which is not true

### 3 Sustainable Aviation Fuel

*Look out for claims in which alternative fuels are presented as “sustainable” (e.g. sustainable aviation fuel), and as a promising climate solution*

Although airlines currently fill their tanks with mostly kerosene and a drop of alternative fuels, they are quite happy to advertise the small percentage of alternative fuels currently being used. The aviation industry markets these agrofuels and synthetic fuels under the label Sustainable Aviation Fuel or SAF, and often pretends that this is a promising climate solution for the aviation industry. This is misleading.

What the industry calls “Sustainable Aviation Fuels” are either biofuels or synthetic fuels. Both do not reduce emissions to zero; both also carry risks.

For instance, biofuels can lead to deforestation and frauds and synthetic fuels are hugely energy-intensive to produce. Scaling up these fuels is difficult, expensive and has limitations. Their use will remain very limited in at least the coming decade, compared to increasing amounts of fossil kerosene. Moreover, the use of these fuels still leads to other harmful climate effects, such as emission of nitrogen oxides, water vapour condensation trails and high cloud formation (the so-called non-CO2-effects).

For more information on these fuels, take a look at the greenwashing factsheets on [bio-fuels](#) and [synthetic fuels](#).

## What should you look out for?

Look out for advertisements that claim that the use of "Sustainable Aviation Fuels" is having a big impact or is even able to make a flight carbon neutral.

Examples of misleading advertisements are



*What do judges, regulators and advertising watch dogs say about these statements?*

[According to the Dutch court](#) in March 2024, it is misleading for KLM to present alternative fuels as "sustainable aviation fuel". The aviation industry markets biofuels and synthetic fuels as Sustainable Aviation Fuel or SAF. The court ruled that labelling these fuels as sustainable is too absolute and hence the term 'Sustainable Aviation Fuel' is misleading.

It follows that also the abbreviation of 'SAF' in marketing is misleading.

UK watchdog ASA arrived to a similar decision in August 2024. [ASA reprimanded](#) Virgin Atlantic Airlines for claiming to be "world's first commercial airline to fly transatlantic on 100% sustainable aviation fuel". According to ASA, many consumers would expect that 100 percent sustainable aviation fuel would mean that the fuel was 100% sustainable, which is not the case with these alternative fuels.

These fossil fuel substitutes still have negative environmental impacts. As ASA concluded on the environmental impacts of these fuels: "This included significant CO<sub>2</sub>, nitrous oxide and other climate-impacting emissions during flight, and that its production was not without other potentially negative environmental impacts in the longer term. For example, this included the diversion of biofuels from other sectors which might then revert back to fossil derived fuels, and the impact of land use changes, both direct and indirect". Hence, Asa ruled that the term 100% sustainable aviation fuel is misleading.

[The Dutch judge](#) in the KLM-case, also decided that it is misleading for KLM to present alternative fuels as a "promising solution" or as "a big step towards a sustainable future". KLM must not paint too positive a picture of alternative fuels as a solution to making aviation more sustainable. According to the court, alternative fuels "only marginally reduce CO<sub>2</sub> emissions and the negative environmental aspects of flying". [According to the aviation lobby body IATA](#), in 2024, the industry might reach 0.5% use of such fuels compared to 99.5% use of fossil fuels. This is while the industry aims to expand air traffic by [an expected](#) 3-4% each year.

The Dutch court also ruled that it is misleading for KLM to present the first test flight that took place on partly synthetic kerosene as an important milestone. This gives customers "positive expectations about flying on synthetic kerosene. This "suggests more than is being delivered and therefore paints too rosy a picture".

Time and time again, every year, usually just before an important climate conference: the aviation industry presents test flights flying partly on alternative fuels as hugely important milestones. For example, one time KLM put [a few litres of synthetic fuels](#) in the tank. Another time was the ["first transatlantic flight on SAF"](#), or then again a flight engine flying [100% on biofuels in a test run](#). In this way, there are tens of thousands of milestones to be invented, and unfortunately the media are only too happy to go along with this.

But the Dutch judge decreed it to be misleading to present such experiments as important milestones. And rightly so: no one doubts that it is technologically possible to fly planes on (partly) synthetic or biofuels. The problem lies in the scalability of alternative fuels, which is not possible, or demands an insane amount of energy or biomass. Given this scalability is not anywhere near to be realistic, these kinds of experiments are of little relevance.

We can add that it is very questionable if this scalability is a worthwhile goal here, when for reasons of justice resources like biomass and renewable energy should be prioritised for more essential sectors than aviation. Though unfortunately this argument has not made it into the Court's rulings.

Also Austrian Airlines has been reprimanded by the Austrian Advertising Council and in September 2023 by the Austrian court for a misleading advertisement about flying with "SAF". With their slogan that can be translated as "Flying CO<sub>2</sub>-neutral to the Biennale? No problem for us" they claimed that it was possible to fly CO<sub>2</sub>-neutral by using 100% Sustainable Aviation Fuels (SAF). This is not true, and thus misleading, according to the Austrian regulators.

*Look out for claims in which an airline or airport presents a rosy picture of small steps that it is taking.*

Airlines and airports often present the small steps they are taking as very impactful. Given the (extremely) polluting nature of the aviation industry, its plans for continual growth, and the only marginal improvement in terms of sustainability they achieve with their measures, this is misleading. This kind of advertising creates a too rosy picture of those steps and exaggerates the environmental impact of the proposed measures. For example, if an airline uses one per cent alternative fuels in the tank, or has purchased lighter business class seats, then this is not a significant improvement for the environment and it is misleading to exaggerate the environmental impact of the proposed measures.

For more information on these small steps, take a look at the greenwashing factsheets on efficiency, electric flights, biofuels and synthetic fuels.

*What should you look out for?*

Look out for advertisements that present a very rosy picture of small measures. This can be a new plane, a new chair or material on a plane, the new paint of an airplane made of a biological material, re-using coffee pads etc.

*What do judges, regulators and advertising watchdogs say about these statements?*

KLM referred to measures such as fleet renewal, operational improvements or the use of alternative aviation fuels as “an important milestone”, a “promising solution” and “a big step towards a sustainable future”. [According to the Dutch court in the KLM case](#), these measures only marginally reduce the negative environmental aspects of flying. It is therefore misleading to paint too rosy a picture of these measures.

This is also illustrated by [the decision of UK watchdog ASA against Etihad Airways](#) in April 2023, that ruled that initiatives such as reducing single use plastics and using more efficient aircraft were not adequate substantiation to evidence a “sustainable aviation” claim.” Hence, Etihad was told to “to ensure that their ads did not give a misleading impression of the impact caused by travelling with the airline and that robust substantiation was held to support them.

The European Commission and national consumer authorities have taken [action](#) against Zalando (February 2024), and require Zalando to ‘ensure that Zalando’s environmental claims are based on aspects which are (genuinely) **significant for the environment**. This shows that airlines should be really careful about advertising their small steps.

