

To:

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Brussels, 9 March 2026

Joint Industry Letter on Non-CO₂ Monitoring, Reporting and Verification (MRV)

We are writing in relation to the implementation of **Directive (EU) 2023/959**, amending the **EU Emissions Trading System Directive (EU ETS Directive)**, and introducing a mandatory monitoring, reporting and verification system (MRV) for non-CO₂ aviation climate effects, and the corresponding amendments to Commission Implementing Regulation (EU) 2018/2066 setting out the detailed monitoring and reporting requirements applicable from 1 January 2025.

The aviation industry remains fully committed to transparent climate reporting and to supporting the scientific advancement of evaluating the climate impacts of non-CO₂ effects. However, we must express serious concerns regarding the operational readiness and legal feasibility of the current implementation timeline, particularly given the development status of the NEATS IT tool.

Aircraft operators are legally required to monitor non-CO₂ impacts from 1 January 2025 and to submit verified reports by 31 March 2026 for the 2025 emissions year. In some Member States, such as Spain, the reporting deadline was set for **28 February**, further reducing the available compliance window.

We would like to recall that the initial rollout of the NEATS IT tool was **delayed several times** during the course of 2025. While the initial version of the tool was released by EUROCONTROL in September 2025, DG CLIMA and EUROCONTROL missed subsequent self-imposed deadlines to release the second version of NEATS by the end of 2025, which included important updates such as validation of flight data and computation of non-CO₂ aviation effects using Method C. A subsequent third release was expected in **January 2026**, promising updates that would enable direct flight selection from EMIS and the generation of the annual non-CO₂ aviation effects report.

However, during the DG CLIMA–EUROCONTROL meeting of 5 February on NEATS v2, it was clarified that the tool is not expected to be fully operational **before March 2026**. This revised timeline creates a significant misalignment between the start of the legal monitoring obligation, the availability of a stable and tested reporting system, and the first binding reporting deadline.

While development continues, several critical elements remain insufficiently consolidated. These include clear operational guidance on methodologies and default assumptions, harmonised verifier guidance and standardised checklists, transparency on data processing and access governance, and full scientific validation of the computational models. In addition, the reporting framework remains technically demanding, particularly for smaller operators with limited IT and analytical resources.

In practical terms, operators are currently required to collect and process primary data manually without access to a fully functional Commission-provided reporting infrastructure. This situation exposes them to compliance risks that are not within their control and raises legitimate concerns regarding proportionality and legal certainty.

In light of these circumstances, we respectfully urge the Commission to introduce a temporary and proportionate flexibility, including:

- A temporary adjustment of the mandatory non-CO₂ MRV reporting, providing a **minimum 2-month flexibility** (instead of the current 1 month) for reporting to the authorities, to ensure that the first binding reporting requirement is fair and fit for purpose. This measure would provide the **necessary and coherent flexibility** for aircraft operators to comply effectively with their non-CO₂ MRV obligations.
- An official Commission communication clarifying that no penalties will be applied in relation to the 2025 reporting year, thereby ensuring a **harmonized approach across Member States** and avoiding placing the burden of requesting flexibility on operators.

Such temporary flexibility would not weaken the Union's climate ambition. On the contrary, it would strengthen the credibility, robustness and enforceability of the non-CO₂ MRV framework by ensuring that legal obligations are supported by technically reliable and operationally feasible tools.

We remain at your disposal to engage constructively with DG CLIMA services to ensure a smooth and legally sound implementation of this important file.

Sincerely yours,



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