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EXPERT STATEMENT

We – the signatories of this statement – are scientists and tourism experts. Between us we hold decades of experience in studying tourism's climate impact and ways to reduce this impact.

We fully support the decision of the city council of The Hague to ban all fossil fuel advertisements from public spaces. The ban defines fossil advertisements as "advertising about fossil fuel products and services, holidays involving air travel, flight tickets, fossil electricity contracts, cruise travel, or cars with a fossil or hybrid engine" (Overheid.nl, 2024).

We note that this decision is fully aligned with the recommendations of four different, renowned scientific bodies in the Netherlands: the Council for the Environment and Infrastructure (RLI, 2023), the Scientific Climate Council (WKR, 2023), the Netherlands Environmental Assessment Agency (Hanemaaier et al., 2023), and TNO (Paradies & Brink, 2023). Each of them independently advised the Government of the Netherlands to implement a ban on advertisements for carbon-intensive products.

We also note that a council of 12 social scientists and ethicists reached the same conclusion in independent advice to the House of Representatives of the Netherlands: fossil fuel advertisements block the transition to a sustainable society; a ban on fossil fuel advertisements stimulates sustainability transitions (Bouman et al., 2023). The The Hague ban is found a pivotal signal of rejecting the normalisation of fossil fuel promotion, whilst not restraining consumer freedom. This appears to induce a comparatively broad public acceptability (Bouman et al., 2025). Finally, we note that international law experts conclude that a ban of fossil advertisement is lawful under Dutch and European Law (Kaupa, 2024; Venzke & Ankersmit, 2024).

In this expert statement, we build on this sound evidence base, and consider the greenhouse gas emissions of the global tourism industry and this sector's persisting inertia to step up its emission reduction effort. We state that a ban on advertisements for carbon intensive tourism products is a sound policy action, realistically timed to push for real change and firmly in line with the latest science on tourism's climate impact. We have summarised this evidence in five points:

- 1 Rapid and deep emission cuts are required in all sectors to secure a liveable future for all. For the tourism industry this means the immediate implementation of emission reductions so that it can accomplish its own pledge to cut tourism emissions in half over the next 5 years and reach netzero emissions as soon as possible before 2050: the Glasgow Declaration on Climate Action in Tourism.
- 2 Tourism is a main driver of climate change, notably due to the growth of aviation and – related – the distances that people travel. Rapid and deep emission cuts in tourism are therefore essential to secure a liveable future for all, with a key role for aviation.
- 3 In its current form, the continued growth of tourism cannot be aligned with the rapid and deep emission cuts required to accomplish halving emissions by 2030 and net-zero emissions by 2050.
- 4 Current tourism industry measures are completely insufficient to reach netzero emissions by 2050, nor halving emissions in 2030. Sustainable technological measures to reduce aviation emissions are not available at the required scale within this timeframe.
- 5 Tourism can only reach net-zero emissions by 2050 when available technological measures are combined with measures that limit demand for travel highly dependent on fossil fuels, i.e. travel products involving air transport and/or cruises.

We have substantiated each point in the appendix, explicitly addressing the persistent emission reduction impasse of the Dutch outbound travel industry.

Yours faithfully, on behalf of the signatories,

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Appendix

- 1 Rapid and deep emission cuts are required in all sectors to secure a liveable future for all. For the tourism industry this means the immediate implementation of emission reductions so that it can accomplish its own pledge to cut tourism emissions in half over the next 5 years and reach netzero emissions as soon as possible before 2050: the Glasgow Declaration on Climate Action in Tourism.
- Limiting global warming to 1.5°C, as specified in the Paris Agreement on climate change (UNFCCC, 2015), translates into a 45% reduction of greenhouse gas emission from 2010 levels by 2030 and net-zero emissions around 2050 (IPCC, 2018).
- 1.2 Achieving net-zero emissions around 2050 requires rapid and far-reaching transitions across all sectors to secure a liveable and sustainable future for all: <u>failing to do so will put millions of lives at risk</u> (IPCC, 2023; Ripple et al., 2024; Rockström et al., 2023). Between 2030 and 2050, climate change is expected to cause 250,000 additional deaths per year. Reducing emissions, notably through better energy use and transport choices, can result in large public health gains (WHO, 2023).
- 1.3 A key commitment to accomplish rapid and far-reaching transitions in global tourism is the Glasgow Declaration on Climate Action in Tourism (One Planet Sustainable Tourism Programme, 2021). The Glasgow Declaration's signatories have committed to halve tourism emissions by 2030 and reach net-zero emissions as soon as possible before 2050. Over 850 tourism organisations have become signatories (UNWTO, n.d.), including the Dutch Association of Travel Agents and Tour Operators (ANVR).
- 2 Tourism is a main driver of climate change, notably due to the growth of aviation and – related – the distances that people travel. Rapid and deep emission cuts in tourism are therefore essential to secure a liveable future for all, with a key role for aviation.
- 2.1 Scientific studies and industry reports each using different parameters show that tourism emissions have been growing much faster than the total emissions of the global economy in the decade up to the Covid-19 pandemic, contributing approximately 8% to 10% of global emissions in 2019 (Sun et al., 2024; TPCC, 2023; WTTC, 2024). Tourism therefore causes an increasing part of the world's greenhouse gas emissions. Current

(2024) tourism emissions are on track to return to the 2019 / pre-Covid 19 levels (WTTC, 2024).

- 2.2 Tourism, thus, is a carbon intensive industry. It produces more emissions per dollar sales than the average across all economic sectors (tourism produces around 1 kg CO₂e per dollar spending, 25% higher than the global economy's average, at 0.75 CO₂e) (Sun et al., 2022). If calculated for service sectors only, the CO₂e kg/\$ ratio of tourism would be 5-10 times higher.
- 2.3 Aviation is the main driver of tourism emissions growth. Aviation is responsible for approximately 5% of anthropogenic global warming until date and contributes 2.4% of global annual CO₂ emissions (Grewe et al., 2021; Klöwer et al., 2021). The non-CO₂ effect of airplanes, notably cirrus cloud formation and NOx emissions, could triple the current warming effect of aviation since 1945 (Lee et al., 2021). Passenger air transport is projected to grow with 4% per year. As other sectors decarbonise, aviation's share of global emissions will increase, and cause 0.1 °C of global warming on its own by 2050 (Grewe et al., 2021; Klöwer et al., 2021).
- 2.4 The share of aviation in tourism trips has risen quickly during the past two decades, which has caused the total distance travelled to grow faster than the number of trips. This combination the rapid increase of tourism air transportation and travelled distances makes aviation the main driver of tourism emissions growth (Peeters & Papp, 2024; Sun et al., 2024). The emissions of tourism air transportation grow much faster than overall tourism emissions. Air transportation is now used for approximately 25% of all tourism trips, but produces approximately 75% of all tourism transportation emissions (TPCC, 2023). Albeit on a smaller scale, the same disproportionality applies to cruise tourism emissions (Gössling et al., 2024).
- 2.5 Travel products involving air travel and/or cruises exemplify entrenched carbon inequality. The produced desire (demand) for exotic travel experiences (requiring longer distance travel from, in this case, Western European source markets) and travel products that increasingly rely on aviation and luxury amenities have turned tourism into a carbon-intensive consumption category (Lenzen et al., 2018). Long-haul aviation and cruise trips can produce a carbon footprint that is a factor 10 to 20 higher than domestic or more regional holidays by train or car, with some surpassing average global annual per capita emissions (Eijgelaar et al., 2021). Visitors from high income countries use a high proportion of air transportation. 4% of the world's population travelled

internationally by air in 2018; at most 1% of the global population are frequent flyers and produce more than half of the total air travel emissions (Gössling & Humpe, 2020). Visitors from and in low-income countries make limited use of commercial travel services (notably air transportation). Their travel generally involves the bare necessities (Lenzen et al., 2018).

The Netherlands

- 2.6 Considering its relatively small population, the Netherlands is a disproportionate contributor to global tourism emissions. Total Dutch holiday CO₂ emissions were 18.1 Megaton in 2019, and its share of total Dutch economy emissions grew from 8% to nearly 12% between 2002 and 2019. In 2019, the total contribution of CO₂ emissions by Dutch holidaymakers constituted 11.8% of all CO₂ emissions of the Dutch economy; holidays outside of the Netherlands produced about 86% of all Dutch holiday emissions (Eijgelaar et al., 2021).
- 2.7 The tourism emissions of Dutch holidaymakers also demonstrate carbon inequality. Between 2002 and 2019, the main driver of 25% tourism emissions growth of Dutch holidaymakers has been holidays outside Europe using air transport (see figure 1). In this period, the number of holidays increased at a much lower rate (+4.6%) than the total distance travelled on holiday (+57%). The main driver here has been a doubling of the number of holidays using air transport and of the total distance travelled using air transport. In 2019, air transport was used for 79% of the total holiday distance travelled, whereas holidays using air transport constituted 26% of all holidays that year and caused 64% of all holiday emissions. Holidays outside Europe using air transport make up 5-7% of the total number of holidays, but produce more than a third of all holiday emissions (Eijgelaar et al., 2021).



Source: CVO 2002, 2005, 2008-2019 (calculation CSTT/NRIT Research)

Figure 1: Dutch holiday emission trends by transport mode and degree of organization, 2002-2019. Source: (Eijgelaar et al., 2021)

- 3 In its current form, the continued growth of tourism cannot be aligned with the rapid and steep emission cuts required to accomplish halving emissions by 2030 and net-zero emissions by 2050.
- 3.1 The main drivers of tourism emissions growth are slow technology efficiency gains combined with sustained high growth of tourism demand (3.8% per year) (Sun et al., 2024). The rapid increase in tourism demand outstrips marginal efficiency gains. Technological improvements alone are therefore insufficient for achieving net-zero emissions in tourism (Gössling et al., 2024; Peeters et al., 2016; Peeters & Papp, 2024).
- 3.2 Carbon-intensive tourism transport travel products involving air transport and/or cruises is the main contributor to tourism emissions. Air transport is now used for approximately 25% of all tourism trips, but produces approximately 75% of all tourism transport emissions (TPCC, 2023). Similarly, growth rates of cruise holidays outpace accomplishable efficiency (emission intensity) improvements and make it impossible for this sub-sector to meet its own net-zero goals (Gössling et al., 2024).
- 3.3 To accomplish the Glasgow Declaration on Climate Action in Tourism, tourism therefore not only needs large scale implementation of all available emission reduction technologies, but should also stop the growth of air transport use and reduce the share of medium to long-haul air travel for the coming decades (Peeters & Papp, 2024; TPCC, 2023).

The Netherlands

3.4 Between 2002 and 2019, the rapid increase of emissions caused by holidays using air transport went hand in hand with a rapid increase of emissions by organised holidays: the latter even showed stronger growth overall (see fig 1). Many of these trips are purchased from tour operators or travel agencies as packaged products (sea cruises; long-haul holidays by plane; holidays to European sun-sea-sand destinations). As table 1 shows, these trips have the highest average carbon footprints because of the transport component (Eijgelaar et al., 2021).

	Carbon footprint per holiday in kg CO ₂			Share of total carbon footprint in %*		
	Transport	Accom- modation	Other	Transport	Accom- modation	Other
Package trip	616	236	99	65%	25%	10%
Combined trip	633	189	109	68%	20%	12%
Only transport organised	726	110	120	76%	12%	13%
Only accommoda- tion organised via booking agency	50	99	61	24%	47%	29%
Only accommoda- tion directly booked	67	121	85	24%	44%	31%
Non-organised	83	100	62	34%	41%	25%
Average	246	131	79	54%	29%	17%

Source: CVO, 2019 (calculation CSTT/NRIT Research)

Table 1: Share of components of Dutch holiday emission per organization type, 2019. Source: (Eijgelaar et al., 2021)

- 4 Current tourism industry measures are completely insufficient to reach netzero emissions by 2050, nor halving them in 2030. Sustainable technological measures to reduce aviation emissions are not available at the required scale within this timeframe.
- 4.1 Considering the continued growth of tourism, the obligation of all tourism firms to reduce their emissions to net-zero within 25 years is unachievable. At present, not a single destination or tourism subsector has achieved meaningful tourism greenhouse gas emission reductions. Also large tourism firms despite significant resources are not on track. Emission intensities improve but overall emissions continue to grow in all tourism subsectors, notably in aviation (Gössling et al., 2024).
- 4.2 Current observed action and incremental change in aviation is insufficient to achieve the climate goals as articulated in the Glasgow Declaration on Tourism and Climate

Action (Peeters & Papp, 2024; TPCC, 2023). Aviation lacks feasible emission reduction solutions available at the required scale to achieve net-zero emissions in time and the sector's current emission reduction policies are found to be ineffective (Grewe et al., 2021; Mayer & Ding, 2023). The aviation industry and scientists have developed a range of specific aviation sector scenarios that explore different combinations of measures to align air transport with IPCC emission pathways that limit global warming to 1.5°C, as specified in the Paris Agreement on climate change. None of these scenarios project that aviation will accomplish net-zero emissions by 2050 without large-scale, out-of-sector interventions (demand reduction measures and wide-scale application of carbon capture and storage technologies (CCS)) (IATA, 2024; Peeters et al., 2024). CCS is highly controversial because of serious feasibility and sustainability issues and because it normalises dangerous overshoot of the safe limit of global warming (Rockström et al., 2023; Schleussner et al., 2024).

The Netherlands

- 4.3 ANVR's emissions reduction activities have been ineffective until date. ANVR has been declaring ambitions to reduce greenhouse gas emissions and participated in climate change mitigation projects since 2013. In a vision document published that year, ANVR states that the Dutch outbound travel industry makes maximum efforts to reduce its CO₂ emissions (ANVR, 2013). ANVR participated in the development of a carbon management tool for tour operators (CARMACAL). Industry adoption of this tool has been very limited and tour operators used it to calculate offsets rather than implement emission reductions, seriously restricting CARMACAL's impact (Buijtendijk et al., 2018; van der Duim & Keller, 2021). In 2023 ANVR presented a new sustainability ambition, in which it states to aim for immediate emission reduction to reach net-zero emissions by 2050 and substantial absolute emission reductions in 2030 (ANVR, 2023).
- 4.4 Despite all activities listed under 4.3, Dutch organised holiday emissions a commonly advertised fossil fuel product category subject to The Hague's fossil fuel advertisement ban (Overheid.nl, 2024) grew by 94% from 2002 to 2019; more than Dutch holiday emissions involving air transport (+75%), overall Dutch outbound holiday emissions (+38%), and total holiday emissions (+25%) (Eijgelaar et al., 2021).

- 5 Tourism can only reach net-zero emissions by 2050 when available technological measures are combined with measures that limit demand for travel highly dependent on fossil fuels, i.e. travel products involving air transport and/or cruises.
- 5.1 Restricting continued growth and demand for air transport is unavoidable to align tourism with the Paris Agreement and accomplish the Glasgow Declaration on Tourism and Climate Action (Peeters & Papp, 2024; Sun et al., 2024; TPCC, 2023). The same at a smaller scale applies to cruises (Gössling et al., 2024).
- 5.2 Large tourism firms therefore need to develop new business models that do not rely on demand for highly fossil fuel dependent travel, i.e. travel products involving air transport and/or cruises, to be profitable (Gössling et al., 2024). Government policies should incentivise this transition and focus on demand reduction of emission intensive modes of tourism to align tourism with its own net-zero goals. Such measures are particularly urgent in relation to (long-haul) air travel (Gössling et al., 2024; Lenzen et al., 2018; Sun et al., 2024).

The Netherlands

- 5.3 The majority of ANVR members have products that depend on aviation. Enticing these firms to transition away from products that will remain largely fossil fuel dependent the coming decades is a daunting task for ANVR, as the trade organisation representing the business interests of these firms. Aviation lacks feasible emission reduction solutions available at the required scale to achieve net-zero emissions in time (see 4.2), and the bulk of 199 ANVR member tour operators operating in the leisure travel segment currently have product portfolios that are fully or partially aviation-dependent (46% use air transport exclusively, regardless of distance; another 36% use air transport and other modes of transport (Buijtendijk et al., 2024)).
- 5.4 For a considerable part, the aviation-dependency of ANVR members can be viewed as a situation of ANVR's own making. Since 1989, this trade association has played a role in introducing the topic of sustainable tourism to its members, and initially succeeded in re-defining sustainable tourism within the scope of destinations (van der Duim & Keller, 2021; van Wijk, 2009). The climate issue of air transport historically a taboo subject to ANVR and airline partners (notably KLM and Transavia) given the increasing number of holiday flights and related commercial interests was first kept off-limits and later

predominantly considered as a responsibility of consumers rather than tourism companies (Beckers & Jansen, 1999; Buijtendijk et al., 2018; van Wijk, 2009). ANVR's emission reduction ambitions and activities have never lead to emission reductions (see 4.3 and 4.4). Instead, in the face of rising Dutch outbound leisure travel emissions (see 4.4), ANVR's sustainability initiatives have mainly focused on symptoms rather than underlying causes and often functioned to keep structural solutions off-table (Buijtendijk, 2021; van der Duim & Keller, 2021).

5.5 ANVR members and affiliated companies have also frequently mislead consumers about their sustainability activities. Since 2016, 15 greenwashing cases have been brought up against advertisements of tourism firms promoting their products in the Netherlands: 1 civil court case and 14 Stichting Reclame Code (SRC) cases (SRC is the organisation that deals with the self-regulation of advertising in the Netherlands based on rules set out in the Dutch Advertising Code (SRC, 2025a)). In the vast majority of these cases, the court / SRC ruled that the advertisements of these firms were misleading (see table 2). Mid 2024, the European Commission and EU consumer authorities - co-led by the Netherlands Authority for Consumers and Markets (ACM) also sent letters to 20 airlines identifying several types of potentially misleading green claims and inviting them to bring their practices in line with EU consumer law (ACM, 2024; EC & CPC Network, 2024), with due references to Dutch cases (BEUC & ClientEarth, 2024). Therefore, also in the Netherlands, government policies that incentivize modes of tourism that align ANVR with its own net-zero pledge as signatory of the Glasgow Declaration play an important role. A ban on fossil advertisements in the public space is an important step in this respect, as this reduces the marketing cost of sustainable travel products. It also simply limits opportunities for greenwashing, the latter which confuses consumer decisions (Bouman et al., 2025; Friedman & and Campbell, 2023).

Year	Company	Utterance	SRC/court	Result	Reason loss/win
2016	TUI (tour	use term	SRC	Industry	Misleading sustainability
	operator	sustainability		loss	claims.
	with own				
	airline)				
2019	KLM	Baby in ad	SRC	Industry	Would imply airlines are
				win	not allowed to advertise.

2020	KLM	Biofuels	SRC	Industry	Misleading sustainability
				loss	claims
2021	Groningen	Green flying	SRC	Industry	Misleading sustainability
	airport			loss	claims.
2021	Low	Climate-	SRC	Partial	Elements of the message
	Carbon	neutral travel		industry	contain misleading
	Travels			loss	sustainability claims.
2022	Groningen	Green flying	SRC	Industry	Misleading sustainability
	Airport			loss	claims.
2022	KLM	CO ₂	SRC	Industry	Misleading sustainability
		compensation		loss	claim.
2023	Corendon	Leave the	SRC	Partial	SRC is not in the position
	(tour	destination		industry	to judge on general
	operator	better than it		loss	claims about how travel
	with own	was.			companies should
	airline)				advertise; misleading
					sustainability claims.
2023	TUI	Fair travel	SRC	Industry	Misleading sustainability
				loss	claims
2024	Travel	CO ₂	SRC	Industry	Misleading sustainability
2024	Travel Essence	CO ₂ compensation	SRC	Industry loss	Misleading sustainability claims
2024	Travel Essence (tour	CO ₂ compensation	SRC	Industry loss	Misleading sustainability claims
2024	Travel Essence (tour operator)	CO ₂ compensation	SRC	Industry loss	Misleading sustainability claims
2024	Travel Essence (tour operator) TUI	CO ₂ compensation Flights	SRC SRC	Industry loss Industry	Misleading sustainability claims SRC is not in a position to
2024	Travel Essence (tour operator) TUI	CO ₂ compensation Flights	SRC SRC	Industry loss Industry win	Misleading sustainability claims SRC is not in a position to judge on general claims
2024 2024	Travel Essence (tour operator) TUI	CO ₂ compensation Flights	SRC SRC	Industry loss Industry win	Misleading sustainability claims SRC is not in a position to judge on general claims about how travel
2024 2024	Travel Essence (tour operator) TUI	CO2 compensation Flights	SRC SRC	Industry loss Industry win	Misleading sustainability claims SRC is not in a position to judge on general claims about how travel companies should
2024 2024	Travel Essence (tour operator) TUI	CO2 compensation Flights	SRC SRC	Industry loss Industry win	Misleading sustainability claims SRC is not in a position to judge on general claims about how travel companies should advertise.
2024 2024 2024	Travel Essence (tour operator) TUI MSC	CO2 compensation Flights For a greater	SRC SRC SRC	Industry loss Industry win Industry	Misleading sustainability claims SRC is not in a position to judge on general claims about how travel companies should advertise. Misleading sustainability
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2024 2024 2024 2024 2024	Travel Essence (tour operator) TUI MSC Cruises TUI KLM	CO2 compensation Flights For a greater beauty Fair Friday Greenwashing	SRC SRC SRC SRC Court	Industry loss Industry win Industry loss Industry loss Industry	Misleading sustainability claims SRC is not in a position to judge on general claims about how travel companies should advertise. Misleading sustainability claims Misleading sustainability claim

Table 2. Greenwashing cases involving the Dutch outbound travel industry. Source:

(JudicalSystemNetherlands, 2025; SRC, 2025b)

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