

ESG Update

Switzerland's New Flight Emissions Disclosure Rules: What Changes in 2027

From 1 January 2027, aircraft operators and other providers of flight offers, such as travel agencies and online booking platforms, will be required to disclose the expected flight-related emissions in CO_2 equivalents. The new obligations are set out in Article 7a CO_2 Act and Article 14a CO_2 Ordinance.

Ahead of the new requirements becoming applicable on 1 January 2027, the Federal Office for the Environment (FOEN), as the competent enforcement authority, updated its Enforcement Aid "Emission Information in Flight Offers" (Enforcement Aid) in October 2026. The updated Enforcement Aid provides further non-binding guidance on the practical implementation of the new requirements.



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1. Who is subject to the new requirements?

The emissions disclosure obligations apply to aircraft operators as well as other providers of flight offers, such as travel agencies, tour operators and online booking platforms.[1]

According to the Enforcement Aid, aircraft operators are subject to the emissions disclosure obligations regardless of where they are established. For other providers of flight offers, the legislative materials indicate that the obligations apply only to companies with a registered seat in Switzerland,[2] although this limitation is not expressly reflected in the wording of the law.

2. Which flights and offers are covered?

The emissions disclosure obligations apply to scheduled flights and planned charter flights departing from airports in Switzerland, as well as flights departing from Basel-Mulhouse Airport that are operated under Swiss traffic rights.[3]

FOEN provides the following guidance on different types of itineraries:

Direct flights and return journeys: For one-way flights, the emissions disclosure obligation applies to flights departing from Switzerland. Where an offer includes both outbound and return flights, emissions must be disclosed for both directions, either separately or as a combined figure. If the flights are booked separately, the obligation applies only to the flight departing from Switzerland.[4]

Connecting flights, multi-stop and open-jaw itineraries: For itineraries departing from Switzerland, the emissions disclosure must cover all flight segments to the final destination, including connections outside Switzerland. The same principle applies to multi-stop and open-jaw itineraries. By contrast, additional flights undertaken at the destination, such as sightseeing flights or helicopter tours, are excluded.[5]

Layovers and stopovers in Switzerland: Where an itinerary originates outside Switzerland and includes a stopover in Switzerland of more than 24 hours, the emissions disclosure must cover the flight departing from Switzerland and all subsequent segments to the final destination. No emissions disclosure is required for layovers of 24 hours or less. However, where flights are booked separately, the emissions disclosure obligation applies to the flight departing from Switzerland regardless of the duration of the stay.[6]

3. What information must be disclosed?

Flight offers must state the expected emissions per passenger numerically in CO_2 equivalents (CO_2eq), expressed in kilograms or tonnes. Calculations must at least include the direct CO_2 emissions from fuel combustion. Additional factors, such as emissions from the production of aviation fuels or the use of sustainable aviation fuels, may be included, provided that the scope of the reported emissions is made clear.

As the overall climate impact of aviation extends beyond CO_2 emissions, other climate-relevant emissions and effects must also be taken into account. However, given the lack of scientific consensus on quantifying their impact on individual flights, they may be addressed qualitatively.[7] Where only direct CO_2 emissions from fuel consumption are reported, the respective flight offer must explain this limitation and indicate that the overall climate impact may be higher.

The CO_2 Ordinance requires emissions to be calculated in accordance with current scientific knowledge but does not prescribe a specific method. Suitable emissions calculators or environmental labelling systems may be used. The calculation method used must be sub-

1 Article 7a CO_2 Act; Article 14a(1) CO_2 Ordinance; FOEN Enforcement Aid, p. 6.

2 FOEN Enforcement Aid, p. 16; Explanatory Report on the Amendment to the CO_2 Ordinance of 19 November 2025, p. 2.

3 Article 14a(2) CO_2 Ordinance; FOEN Enforcement Aid, p. 6.

4 FOEN Enforcement Aid, pp. 11, 14 and 16.

5 FOEN Enforcement Aid, pp. 14–15.

6 FOEN Enforcement Aid, pp. 14 and 16.

7 FOEN Enforcement Aid, pp. 6 and 7.

mitted to FOEN upon request.[8] FOEN accepts that different calculation methods may produce different emissions figures for the same flight route.[9]

4. When and how must emissions be disclosed?

According to FOEN's guidance, emissions disclosure is required once an offer identifies a specific flight route by its departure and arrival airports and states a price, even if the operating airline or exact flight has not yet been determined. This includes flight search results displaying multiple options and fares, for which emissions information must be provided for each relevant offer. General advertisements or overview pages listing destinations with indicative starting prices are excluded if the specific airports have not yet been determined.[10]

The emissions disclosure obligation also applies to package holidays that include flights departing from Switzerland. If the disclosed emissions also cover other travel services, such as accommodation or ground transportation, flight emissions need not be stated separately but may be included in a combined emissions figure for the package holiday.[11] Where the operating airline or exact flight is not yet known, an indicative emissions figure must be provided.

Emissions disclosure is required across visual communication channels, including airline websites, online booking platforms, mobile applications, advertisements, brochures and catalogues. Individually prepared customer offers are also covered, whereas radio advertisements and boarding passes are excluded.[12]

Emissions information must be clearly visible and legible. According to FOEN's guidance, it should be displayed in a font size at least as large as that used for other relevant flight details, such as flight duration or the operating airline. Emissions information must be immediately apparent when viewing an offer and cannot be provided solely through links, footnotes or drop-down menus.[13]

5. Who is responsible for calculating and providing the emissions data?

Aircraft operators are required to make the relevant emissions data available to other providers of flight offers.[14] These providers, in turn, must ensure that the emissions information is included in their own offers and supplement it where necessary.[15]

Coordination is particularly important in codeshare and interline arrangements. Providers subject to the emissions disclosure requirements remain responsible for their own offers, including connecting flights. Neither the CO_2 Ordinance nor the Enforcement Aid prescribes a specific mechanism for exchanging emissions data, leaving the parties flexibility to agree suitable arrangements.

6. Interaction with the EU Flight Emissions Label

FOEN's updated Enforcement Aid expressly recognises the use of the EU Flight Emissions Label (FEL) as a means of fulfilling the emissions disclosure requirements, provided that the applicable EU rules are met. However, Swiss law does not require aircraft operators to participate in the FEL, allowing them to use alternative calculation methods and presentation formats that comply with Swiss requirements.

7. Enforcement and consequences of non-compliance

FOEN is responsible for enforcing the new emissions disclosure requirements and has indicated that it will conduct random checks of flight offers from 1 January 2027. Although the CO_2 Act and the CO_2 Ordinance do not provide for a direct penalty for breaches of the emissions disclosure requirements, FOEN may order non-compliant providers to take corrective action. Failure to comply with such an order may result in a fine.[16] No formal grace period should be assumed. Misleading emissions statements may also raise issues under Swiss unfair competition law. Non-compliance may also entail reputational risks.

8. Practical implications

The new emissions disclosure requirements will oblige aircraft operators and other providers of flight offers to review how emissions information is calculated, exchanged and presented to customers. Given the international nature of flight distribution, compliance may also require coordination between parties operating in different jurisdictions, particularly where aircraft operators are based outside Switzerland and offer flights departing from Switzerland.

Before 1 January 2027, affected providers should identify the offers in scope, review their calculation methods and explanatory statements, organise data exchanges with distribution partners and test the display of emissions information across their sales channels.

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8 Article 14a(3) CO_2 Ordinance; FOEN Enforcement Aid, p. 7.

9 FOEN Enforcement Aid, pp. 6–8 and 10.

10 FOEN Enforcement Aid, pp. 9–10 and 13.

11 FOEN Enforcement Aid, pp. 9–13.

12 FOEN Enforcement Aid, pp. 9 and 13.

13 FOEN Enforcement Aid, p. 6.

14 Article 14a(1) CO_2 Ordinance.

15 FOEN Enforcement Aid, pp. 6 and 16.

16 Article 292 in conjunction with Article 106 Swiss Criminal Code.