

# Airlines' Emission Disclosures

## The Fine Line Between Opportunity and Environmental Inaction

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### Keywords

Emission disclosures

Transparency

Trust

Environmental  
degradation

Aviation industry

### Abstract

The aviation industry is notorious for its environmental impact. In response to growing climate change awareness, companies began reporting carbon emissions in the early 2000s to gain public approval. However, the information provided is often filtered to enhance public image, leading to concerns about transparency and greenwashing.

This study examines Ryanair's 2021 Sustainability Report to assess the transparency of its environmental policies and the sincerity of its language. Using Critical Discourse Analysis (CDA) and Hallidayan linguistics, the analysis focuses on how the language reflects the company's attitudes and intentions.

The term 'transparency' involves many contradictions, such as openness versus secrecy. While transparency is a valued ideal, preliminary results suggest that Ryanair's report may construct a reality that serves the airline's interests rather than reflecting genuine transparency.

## 1. Introduction

The aviation industry has long been recognised as a major contributor to environmental degradation. In response to escalating climate change concerns, companies began documenting their carbon emissions in the early 2000s (Bansal and Kistruck 2006). This initiated a trend of transparency where organisations started to publish data about their environmental impact. Despite such initiatives, closer examination reveals that environmental disclosures are often strategically filtered to align with stakeholder interests and enhance corporate image (Ball 2009; Porter and Kramer 2006). Companies frequently tailor their reports to highlight positive environmental trends to garner public approval and demonstrate strategic awareness (Vaccaro and Patiño Echeverri 2010; Holme and Watts 2001).

Consequently, it is essential to closely examine the actual policies that companies have implemented, as this scrutiny is vital to ensuring that the Environmental, Social, and Governance (ESG) transparency demanded by consumers – especially those seeking to align

their financial choices with their values – remains a crucial objective for organisations (Golob et al. 2019; Clarke and Roome 1999).

This study critically examines Ryanair, Europe's largest low-cost airline group. It begins with the premise that a company's disclosure of sustainability practices must provide credible information about its organisational activities along with verifiable performance measurements (Quaak, Aalbers and Goedee 2007). The analysis aims to determine, through an in-depth examination of the language choices within the report, whether Ryanair's environmental policies truly adhere to established transparency criteria.

After laying the theoretical groundwork on transparency and its corporate implications, this study emphasises the significant role that sustainability disclosure practices play in shaping organisational transparency (Calderon, Gurtu and Holly 2024). The next phase involves a detailed exploratory analysis of Ryanair's 2021 Sustainability Report, focusing not only on the language employed but also on what information is conspicuously omitted.

Utilising Critical Discourse Analysis (CDA) as a methodological framework, this study reveals, in the first place, how omissions can indicate the priorities and values reflected in the report's content. By closely examining these omissions, we aim to uncover potential gaps in transparency that may distort Ryanair's portrayed commitment to sustainability.

Moreover, Halliday's concept of interpersonal meaning sheds light on the writer's attitudes and intentions conveyed through the language used in the report (Halliday and Matthiessen 2013). This concept is closely aligned with the principles of Critical Discourse Analysis (CDA), which emphasises how language both reflects and shapes power dynamics and social practices. By scrutinising both the explicit language and the implicit values represented, this analysis aims to determine whether Ryanair's claims about its environmental practices genuinely align with its actions. In doing so, it fosters a more informed dialogue on corporate transparency within the airline industry.

## 2. Corporate sustainability reporting

If we measure how a company's marketing about its sustainability practices matches reality, it may be helpful to turn to the firm's corporate social responsibility reporting (Nyantakyi et al. 2023). The concept of corporate social responsibility emerged in response to the negative environmental impacts of rapid economic growth in the 1970s and 1980s, exacerbated by globalisation (Fallah Shayan et al. 2022). In 2000, the UN Global Compact encouraged businesses to integrate sustainability into their annual reporting cycle.<sup>1</sup> In 2021, the Governance & Accountability Institute, a consulting firm focusing on corporate sustainability

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<sup>1</sup> [unglobalcompact.org](https://unglobalcompact.org). All websites were last visited on 03/03/2024.

and ESG best practices, stated that 92% of S&P 500 companies<sup>2</sup> published a sustainability report in 2020.

Corporate sustainability reporting is meant to demonstrate to various company stakeholders – employees, investors, suppliers, and communities – how the firm contributes to sustainable development goals by using data to measure progress (Holme and Watts 2001).

A CSR report is generally broken down into several categories outlining a company's sustainability and ESG goals for its stakeholders, including, for instance:

- an overview of how the company uses its resources and pursues its environmental goals, such as reducing pollution, cutting waste, or becoming energy-efficient;
- an outline of employee-related practices, relationships with suppliers, and community involvement;
- a review of philanthropic efforts, explaining how a company gave back to its community, whether through direct monetary investment or employee volunteer efforts (Alsayegh, Rahman and Homayoun 2020).

Even though all three categories are present in the 2021 Ryanair Sustainability Report, this paper focuses on the first one, often defined as a voluntary commitment to societal expectations beyond legal requirements (Falck and Heblich 2007).

### 3. Transparency

Transparency is multifaceted and often intertwined with language and communication practices. According to Summers and Nowicki (2006), transparency involves actions, credible governance systems, visible performance measurements, and accessible decision-making information. However, since utterances can never be perfectly transparent, due to the multiplicity of meanings available (Bakhtin 1981), the semantic value of words may sometimes exceed the speaker's intentions. This has led some scholars to argue that transparency is often more of a social construct than a linguistic quality (Garvey 2000).

Transparency encompasses both openness and its antonyms, such as opacity and mistrust (Koskela 2018): it evokes a duality between light and darkness, suggesting that providing clarity in one area may expose opacity in others, creating a paradox of substance (Lamming, Caldwell and Harrison 2004). In fact, information disclosure offers insight but may obscure complex processes, limiting understanding to selected representations of reality (Whiteman, Walker and

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<sup>2</sup> The S&P 500 Index, or Standard & Poor's 500 Index, is a market-capitalisation weighted index of 500 leading publicly traded companies in the US. [www.investopedia.com](http://www.investopedia.com).

Perego 2013; Christensen and Askegaard 2001).

Transparency is an evolving concept encompassing what people and/or organisations do and what they claim to do. It is not a static condition, but a dynamic process shaped by contextual factors and regulatory exigencies. While it is upheld as a social value, its practical implementation and implications are contingent upon linguistic practices, regulatory frameworks, and organisational contexts.

### ***3.1 The imperative of transparency in contemporary corporate communication***

In recent years, there has been a growing push for organisational transparency, particularly regarding environmental policies, driven by heightened concerns over climate change. Transparency now plays a central role in organisational discourse, as companies face increasing pressure to share relevant information with stakeholders (Christensen 2002). In this context, Van Rekom and Van Riel (2000) argue that transparency has transformed into a 'basic requirement' for organisations, significantly shaping their communication ecosystems and influencing managerial approaches. However, it is not enough to provide data (visibility). In fact, for fostering trust it is also necessary to provide evidence that enables stakeholders to evaluate and hold organisations accountable (Fisher and Hopp 2020), ensuring comprehension and tracking of a company's activities (Chandler 2014), by means of information disclosure, clarity and accuracy (Schnackenberg, Tomlison and Coen 2021).

Accuracy, in particular, is of paramount importance, in that it is about information reliability rather than completeness or understandability (Angulo, Nachtmann and Waller 2004). With this in mind, various theorists have used related terms to conceptualise accuracy in their assessments of transparency. Philippe and Durand (2011) have suggested that an organisation's claims regarding its environmental footprint must be precise enough for external stakeholders to ascertain its actual ecological impact. Bushman, Pietroski and Smith (2004) have stated that information must be valid to be considered transparent. Similarly, Williams (2005) and Nicolaou (2010) have argued that organisational information must be reliable to be considered transparent.

However, despite efforts to project transparency, organisations often struggle with ambiguity, seeking to balance cohesion and diverse perspectives (Christensen 2002). Therefore, the equation of information disclosure with genuine transparency remains contentious, and as a consequence, consumer skepticism persists regarding organisational transparency efforts.

## 4. Objectives, materials and method

In the aftermath of the global pandemic, the airline industry faced unprecedented challenges, since their normal business activities were disrupted and they had to bear the brunt of the impact (Sharma and Nicolau 2020). Amidst this turmoil, effective communication became crucial for companies like Ryanair, Europe's largest low-cost airline group, to reassure stakeholders about their response to the crisis.

Recognizing that their actions might align with a strategic advantage, as suggested by scholars such as Vaccaro and Patiño Echeverry (2010) and Holme and Watts (2001), Ryanair decided to place greater emphasis on sustainability in its 2021 annual disclosures. Indeed, the corpus for this study consists of Ryanair's 2021 Sustainability Report, titled "Aviation with Purpose." This document was selected for analysis because it represents a significant shift in the company's approach to sustainability reporting, marking the transition from a component of the annual report to an independent, standalone document. This transition reflects the increasing importance of sustainability within Ryanair's operational framework and strategic priorities. Focusing on the year 2021 ensures that the analysis captures this pivotal moment of redefined commitment to sustainability.

The method of corpus compilation involved downloading the entire 2021 Sustainability Report and extracting only the textual parts, which entailed removing images and other non-textual elements. This decision ensured that the analysis concentrated solely on the linguistic content, allowing for a clearer examination of the language used to convey Ryanair's attitudes and intentions regarding environmental sustainability. The final size of the corpus is 12,417 tokens. It is important to note that no reference corpus was employed in this study. This choice aligns with the study's objective to focus exclusively on Ryanair, which positions itself as Europe's cleanest and greenest airline group.

The study sets forth three key objectives. First, conducting a comparative analysis of Ryanair's internal assertions against independent data sources will be crucial to verifying the accuracy and reliability of their reported environmental impact. This aspect is fundamental in determining whether Ryanair's claims are substantiated by adequate evidence and genuinely reflect their operational realities.

Second, the analysis will assess the presence or absence of specific data points essential for a comprehensive understanding of Ryanair's environmental impact. This evaluation aims to determine whether the disclosed information sufficiently supports Ryanair's claims regarding its environmental performance, thereby scrutinising the completeness of their reporting.

Third, the analysis will examine the linguistic strategies used in the report, including vagueness, to determine whether Ryanair's statements are generally vague and non-specific or

reflect a clear and precise commitment to transparency in the company's environmental practices.

This study employs a comprehensive methodology that integrates Critical Discourse Analysis (CDA), corpus-assisted language analysis, and Systemic Functional Linguistics (SFL) to provide a nuanced evaluation of Ryanair's 2021 Sustainability Report. Critical Discourse Analysis (CDA) offers a robust framework for examining the text, illuminating the writer's perspective and revealing the broader narratives at play (Fairclough, 2013). This study adopts a specific form of CDA that concentrates on omissions, enabling an in-depth exploration of how certain information may be intentionally excluded to create a desired narrative or influence public perception (Wodak and Meyer, 2016). The analysis focuses on the language choices made within the report to unveil not only what is mentioned but also what is omitted. In fact, in the context of transparency, which should arise from clear and accurate information, it is essential to consider not only what is highlighted but also the crucial role of backgrounding. A significant aspect of backgrounding is omission – leaving certain elements entirely out of a text. Omission can be a powerful tool in textualisation, reflecting a deliberate choice by the author to shape the audience's perception (Van Leeuwen 2008; Huckin 1997).

To support an in-depth analysis within the corpus linguistics framework, the study employs Sketch Engine, a powerful software tool designed for comprehensive linguistic data analysis. This tool allows for the examination of wordlists, collocations, and patterns of preferred and dispreferred lexis and structures, thereby effectively uncovering the attitudes and biases embedded in Ryanair's language concerning sustainability issues (Kilgariff et al. 2014). In particular, this study focuses on terms that convey the airline's attitudes and intentions, informed by Halliday's Systemic Functional Linguistics (SFL). By emphasising interpersonal meaning, SFL reveals the power dynamics at play, illustrating how language is utilised to negotiate roles and responsibilities between the company and its stakeholders (Halliday and Matthiessen, 2013). This analysis will critically assess how Ryanair's linguistic choices reveal their commitment – or lack thereof – to sustainability and environmental accountability.

Halliday identifies three main components of interpersonal meaning: mood, modality, and tenor. However, for the sake of the present analysis, it has been decided to rely only on mood and modality, as these two elements provide the most relevant insights into the language used in the report, allowing for a more focused examination of how interpersonal meaning is constructed in the context of Ryanair's environmental claims. Mood refers specifically to the grammatical choices that indicate how language expresses the speaker's or writer's attitude toward the subject matter. This encompasses, among other things, the type of clause used – such as declarative, interrogative, or imperative. Declarative clauses typically convey

statements or assertions, interrogative clauses ask questions, and imperative clauses issue commands or requests.

Understanding mood is vital for interpreting how an organisation like Ryanair communicates its environmental responsibilities. In the context of the Sustainability Report, analysing mood will help reveal whether Ryanair's statements lack specificity and clarity or genuinely convey a commitment to sustainability.

Modality, conversely, pertains to how language expresses the writer's degree of certainty, obligation, or possibility regarding environmental goals. In this study, modal verbs are key indicators of the company's dedication to sustainability. Utilising Halliday and Matthiessen's (2013) classification of modality into high, medium, and low values, the analysis systematically evaluates the language present in the report:

- High modality includes modal verbs such as “must,” “ought to,” “need,” and “have/has/had to,” signifying a strong commitment and obligation toward sustainability initiatives.
- Medium modality is represented by verbs like “will,” “would,” “shall,” and “should,” indicating future intentions or suggestions with less certainty than high modality.
- Low modality encompasses verbs such as “may,” “might,” “can,” and “could,” which suggest possibility or permission but lack strong commitment.

By identifying these modal verbs within the Sustainability Report, the analysis evaluates Ryanair's expressed level of obligation and commitment to its environmental goals, providing insights into the sincerity and authenticity of its claims.

Through this comprehensive framework, the study aims to uncover the intricacies of Ryanair's sustainability reporting, rigorously examining both explicit content and implicit values.

## 5. Analysis

Ryanair advertised itself as “Europe's Cleanest and Greenest airline” in a commercial aired and published in 2019<sup>3</sup>. Its TV and radio ads cited the carrier's “low CO<sub>2</sub> emissions” while its print ad claimed, “Ryanair has the lowest carbon emissions of any major airline.” To prove this point Ryanair compared itself against four other airlines, which they said fell within the definition of “major airlines,” and had been selected out of the many operating ones. Ryanair failed, however, to provide a commonly recognised definition of a “major airline,” as confirmed by the absence of

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<sup>3</sup> [www.bbc.com/news/business-51372780](http://www.bbc.com/news/business-51372780).

some well-known airlines from the chart. Thus, since it was unclear whether they had been measured, it did not appear that they had actually made a market-wide comparison.<sup>4</sup>

The Advertising Standards Authority (ASA), the UK agency responsible for monitoring advertisements for misleading content, determined that Ryanair's claim of having lower CO<sub>2</sub> emissions than any major airline was misleading. The evidence provided by Ryanair was deemed insufficient to substantiate its claim based on the quoted metric. Consequently, the ASA ruled that the ads must not appear again in their current form. Additionally, the ASA instructed Ryanair to ensure that future environmental claims are supported by adequate evidence and to communicate the basis of such claims clearly.<sup>5</sup>

To rebut the accusations, Ryanair claimed that its *per-passenger* emissions were lowest and that this is the only figure that matters. However, while CO<sub>2</sub> emissions *per* passenger distance (mile or kilometre) is an appropriate method, how that was calculated, the role of the seating density<sup>6</sup> in that calculation, and the metric used to measure emissions were never fully explained by Ryanair. In addition, the airline argued that they had used data from Eurocontrol and Brighter Planet to substantiate its claims. But, the ASA established that the flag carrier had not managed to explain how a Eurocontrol chart that ranked it first on traffic but fifth on CO<sub>2</sub> emissions out of 27 airlines had translated into Ryanair being the most efficient, and added that a 2011 Brighter Planet ranking that put Ryanair in pole position on efficiency was "of little value" for a comparison in 2019.

The controversy between Ryanair and the ASA reveals that the airline boasted positive results without providing concrete data to support its claims. This behaviour can guide our analysis by providing guidance on looking for omissions in the Sustainability Report. Consequently, the report will be examined to determine which data or information Ryanair has omitted to support its environmental policy claims.

### 5.1 Omission

Although the claim that Ryanair is "Europe's Cleanest and Greenest airline" was banned, Ryanair continues to use a lot of superlative forms to describe the company's environmental performance also in its 2021 Sustainability Report:

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<sup>4</sup> [www.theguardian.com/business/2020/feb/05/ryanair-accused-of-greenwash-over-carbon-emissions-claim](http://www.theguardian.com/business/2020/feb/05/ryanair-accused-of-greenwash-over-carbon-emissions-claim).

<sup>5</sup> [www.thedrum.com/news/2020/02/05/asa-bans-ryanair-ads-misleading-lowest-emissions-claims](http://www.thedrum.com/news/2020/02/05/asa-bans-ryanair-ads-misleading-lowest-emissions-claims).

<sup>6</sup> The seating density is the number of seats per plane, which can contribute to effectively reducing the total values of CO<sub>2</sub> emissions, by distributing the overall total over a higher number of travelers.



- (1) We aim to be the leader in aviation and remain the cleanest and greenest airline [...] (Ryanair's Sustainability Report 2021, 12)
- (2) Europe's cleanest and greenest airline group. (Ryanair's Sustainability Report 2021, 11)
- (3) As we grow to over 225m passengers by 2026, we understand that we must continue to deliver on what matters most to our customers. We consistently offer the lowest fares, on-time flights, lowest emissions and great customer service." (Ryanair's Sustainability Report 2021, 51)

However, despite the positive descriptions used, to an informed reader, it becomes evident that the information lacks accuracy and reliability. Firstly, there is no evidence provided to substantiate the company's claims. Additionally, the data presented appears inconsistent not only with previous rulings by the ASA but also with an article published on April 8, 2024, in the Irish Examiner which reports that:

Research from pan-European sustainable travel non-governmental organisation Transport & Environment (T&E) said that Ryanair emissions last year surpassed those of 2019, the year before the Covid-19 pandemic halted travel across the world.<sup>7</sup>

If, on the one hand, Ryanair's 2021 Sustainability Report aims to enhance transparency compared to its 2019 edition and acknowledges ranking fifth in CO<sub>2</sub> emissions among competitors, on the other hand, significant disparities arise when comparing this data with that presented in the Irish Examiner:

- (4) We're No. 1 EU airline for traffic, yet we rank fifth in terms of CO<sub>2</sub> emissions. What this means is that we carry almost four times the passengers as the No. 6 airline, while producing similar levels of CO<sub>2</sub> emissions. (Ryanair's Sustainability Report 2021, 17)

Firstly, the Sustainability Report does not provide specific figures for each airline's emissions, instead vaguely references "carbon efficiency performance." In contrast, the Irish Examiner article includes precise emission data. Furthermore, the Irish Examiner cites data from a well-established and reputable external auditor, Transport & Environment (T&E), whereas

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<sup>7</sup> [www.irishexaminer.com/news/arid-41112004.html](http://www.irishexaminer.com/news/arid-41112004.html).

Ryanair's report sources its information from the airlines' corporate annual reports and websites (EasyJet, IAG, Air France-KLM, and Lufthansa).

Furthermore, the report includes a disclaimer statement (5), which only serves to further obscure the disclosure.

- (5) Please note, these figures may split the allocation of flight emissions between passenger and freight activity or incorporate freight activity into the passenger-kilometre metric (Ryanair's Sustainability Report 2021, 16).

Overall, the airline tends to highlight very positive information (such as being labeled "the cleanest and greenest airline" in Europe), while overlooking details that could enhance the accuracy and reliability of the data. As a result of this initial examination, Ryanair's assertions regarding its environmental impact appear too vague and lack the precision necessary for external stakeholders to fully assess the company's ecological commitment. Consequently, the information provided by the organisation cannot be deemed reliable enough to be considered transparent. Further scrutiny of the Sustainability Report may reveal whether this pattern of omitting pertinent information persists.

### 5.1.1 The wordlist

An analysis of the most frequently occurring nouns provides the following results, as reported in Table 1:

Noun	Frequency ptw
customer	13.61
Ryanair	10.22
aviation	8.85
head <sup>8</sup>	8.21
sustainability	8.05
emission*	6.68

**Tab. 1:** Normalised occurrences (per thousand words) of the most frequently occurring nouns

<sup>8</sup> The noun *head* is always followed by the preposition *of*.

Among these terms, the most interesting one for the purposes of the analysis is *emission*, frequently paired with modifiers like *carbon*, *CO2* (both as an adjective and a noun), *gas*, *greenhouse*, and *net-zero*, and preceded by verbs such as *reduce*, *offset*, *compare*, and *cut*. Instances of *reduce \*emissions* are notably more frequent than others, warranting closer examination. However, it is important to note that 60% of these instances do not provide specific figures.

- (6) SAF<sup>9</sup> is a very useful way to reduce carbon emissions, we simply want to ensure it is as safe as it can possibly be. (Ryanair's Sustainability Report 2021, 21)
- (7) Ryanair is actively working with the European Commission, the Fuelling Flight Project and Industry fuel suppliers to encourage government support of the industry investment in SAF and to incentivise its use. [...] Its [the Fuelling Flight Project's] aim is to find various ways to reduce greenhouse gas emissions, initiate and guide the growth of a European SAF industry, and to encourage the market uptake for it. (Ryanair's Sustainability Report 2021, 30)

Reviewing the remaining concordance lines that include figures, we observe that these figures are mentioned in isolation, without any reference to comparative benchmarks.

- (8) The introduction of the Single European Sky initiative will reduce emissions by up to 10%. (Ryanair's Sustainability Report 2021, 12)

This practice raises doubts about whether these figures truly signify substantial progress. Moreover, the frequent use of vague terms like “by up to” further obscures the clarity of Ryanair's environmental goals, contributing to a lack of transparency.

Merely disclosing information in this manner does not suffice to foster trust among stakeholders. What is needed is complete and understandable information that allows stakeholders to assess the validity and transparency of the information provided independently, as well as the adequacy of Ryanair's efforts.

This tendency to omit pertinent information that might help the reader check the data's reliability is also evident in Ryanair CEO's statements, where generalised commitments lacking

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<sup>9</sup> Safe Aviation Fuel.

concrete plans or measurable outcomes further complicate the stakeholders' ability to evaluate the airline's environmental initiatives accurately.

- (9) We intend to cut CO<sub>2</sub> emissions per passenger/km by 10% over the next decade. (Ryanair's Sustainability Report 2021, 3)
- (10) At the heart of our environmental strategy is our USD 22 bn investment in new technology "Gamechanger" aircraft will burn 16% less fuel and reduce noise emissions by 40%. (Ryanair's Sustainability Report 2021, 3)

Once again, while Ryanair's environmental commitments highlighted by these concordances may initially appear promising, upon closer scrutiny, it is clear that they are quite vague and lack the specificity needed to outline actionable strategies.

### **5.3 Analysing mood**

In the context of a sustainability report, mood can be conveyed through language choices that express the degree of commitment, urgency, and responsibility towards environmental issues, or highlight a deficiency in these aspects. Upon revisiting the corpus to identify terms that can indicate Ryanair's commitment, we encounter the term "committed", which ranks 251st with a frequency of 0.54 occurrences per thousand words.

- (11) We are committed to growing our annual traffic from 149m to 225m customers p.a. over the next 5 years and are determined to carry customers in such a way that not only lowers the cost of air travel but reduces the impact on the environment. (Ryanair's Sustainability Report 2021, 3)

The company is committed to growing annual traffic, achieving plastic-free operations, implementing a company-wide decarbonisation program, and increasing the number of female employees. However, once again, these statements are quite general, vague, and lack clear, tangible signs of the airline's actual acceptance of responsibility, as proved by the following example:

- (12) Ryanair continues to strive for perfection in Environmental Noise Abatement Compliance (Ryanair's Sustainability Report 2021, 19).

Here, the verb "strive," meaning "to try very hard to do something or to make something happen,

especially for a long period or against difficulties,”<sup>10</sup> reinforces the impression that the airline's results thus far are far from outstanding.

Scrolling down the wordlist again, in search for further possible indicators of Ryanair's commitment, we encounter the next candidate: the verb “aim”, ranking 324th with a frequency of 0.47 occurrences per thousand words.

- (13) These initiatives are then communicated to the wider organisation. CDP awarded us an industry-leading B climate protection score and we aim to achieve an A score by 2023. (Ryanair's Sustainability Report 2021, 8).

In this case as well, it can be noted that the airline is merely indicating its future aspirations rather than describing what has actually been achieved in terms of results. Finally, to deepen the analysis, it was decided to include frequently used adjectives to gauge indications of transparent commitment in our analysis. Notably, the adjective “proud”, ranking 50th among the adjectives and only 452nd in the general wordlist, with a frequency of 0.34 occurrences per thousand words, emerged as the initial potential indicator.

However, upon scrutinising the information provided, we encounter once again the same recurring issue, namely a noticeable absence of clear evidence and transparency, essential components for fostering trust and credibility.

- (14) We're proud of our many sustainable achievements to date and we're not stopping here! (Ryanair's Sustainability Report 2021, 11)

To summarize, while Ryanair's Sustainability Report employs language that suggests a commitment to various environmental initiatives – evident in terms like “committed” and “aim” – the underlying implications of mood reveal a broader lack of tangible accountability. For instance, the statement regarding their commitment to increasing annual traffic highlights an ambition that raises questions about the impact on sustainability. Moreover, using the verb “strive” indicates ongoing efforts rather than showcasing concrete results, reinforcing the notion that the airline's environmental achievements are still works in progress. Similarly, the adjective “proud” presents a sentiment of achievement but does not substantiate this pride with clear evidence, leading to a perception of opacity rather than the transparency essential for building stakeholder trust. Overall, these examples suggest that, despite claims of commitment,

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<sup>10</sup> [dictionary.cambridge.org/dictionary/english/strive](https://dictionary.cambridge.org/dictionary/english/strive).

the absence of demonstrable outcomes complicates Ryanair's narrative regarding their environmental responsibilities and diminishes the credibility of their sustainability assertions.

#### 5.4 Analysing modality

Modality is articulated through modal verbs and other linguistic devices that signify the level of commitment or obligation towards environmental goals. To identify modal verbs that reflect the company's dedication, Halliday and Matthiessen's (2013) classification of modality into high, medium, and low values was employed.

After examining the concordances of different types of modal verbs found in the report, the following frequencies were identified, as reported in Table 2:

Modal verb	Frequency ptw
must	0.64
ought to	/
need	0.88
have to	0.16
has to	/
had to	/
will	4.10

**Tab. 2:** Normalised occurrences (ptw) of modal verbs

Based on these findings, the decision was made to concentrate specifically on instances of the modal verb "will", particularly focusing on occurrences of "we will", as they refer to the company's involvement/commitment.

"We will" (frequency 1.8 ptw) is followed by several verbs like:

- *carry out,*
- *continue,*
- *create,*
- *ensure,*
- *expand,*
- *make,*
- *manage,*
- *remain,*
- *report*
- *review.*

The two most frequently recurring ones are the verbs *continue* (23%) and *ensure* (15%). Upon closely examining instances of “we will continue”, it emerges that the modal verb *will* is used here to convey dynamic intent (Palmer 2014), indicating willingness, intention, volition, or determination to undertake a future action, as confirmed by the presence of words like *promise*, and expressions pointing to the future, like, for instance, “over the next 12 months”. Thus, it is clear that Ryanair is expressing the intention to pursue a specific course of action, rather than describing its actual achievements in environmental protection. Moreover, the presence of the verb “continue” creates ambiguity as to whether the action is being reiterated due to previous successes or because previous efforts were inconclusive and require further repetition.

- (15) We have made a promise to all stakeholders, our people and our customers, that we will continue to drive change and remain world leaders in the advancement and promotion of green, sustainable aviation policies and practices, in accordance with the UN Sustainable Development Goals and the Paris agreement. (Ryanair's Sustainability Report 2021, 59)

Moreover, and interestingly enough, out of the total number of occurrences of “we will continue,” only 14% refers to issues connected with Sustainability. In contrast, the others concern investments in safety enhancing technologies, carrying out a workforce engagement programme, investing and developing a Safety Management System (SMS), etc.

- (16) We will continue to invest in safety-enhancing technology and manage its safe introduction to Group Airlines. (Ryanair's Sustainability Report 2021, 11)

Similarly, with the verb “ensure”, the predominant meaning pertains to the airline's willingness and intention. However, the same ambiguity persists: it remains unclear whether the action must be undertaken due to previous successes or failures.

- (17) As our Aviation With Purpose strategy evolves, we will ensure that our future reporting aligns with best practice, taking account of materiality and upcoming regulatory requirements such as the Corporate Sustainability Reporting Directive (CSRD). (Ryanair's Sustainability Report 2021, 11)

Also in this case, only 25% of the occurrences of “we will ensure” refer to issues connected with Sustainability, with the others showing concern for the need for robust and effective processes for the prevention of maintenance errors, and for security, promotion and communication.

Overall, the analysis of Ryanair's use of the modal verb "will" reveals a trend of expressing intent rather than concrete actions. The phrases "we will continue" and "we will ensure" demonstrate the airline's willingness to commit to future initiatives, yet they also introduce a degree of ambiguity. For instance, while "we will continue to drive change" suggests a proactive approach to sustainability, it does not clarify whether this commitment stems from previous successes or the need to address shortcomings in the past.

The data shows that only a small portion of these future intentions (14% for "we will continue" and 25% for "we will ensure") is explicitly related to sustainability efforts. Much of the focus shifts towards investments in safety and regulatory compliance, which, while important, dilutes the emphasis on environmental responsibility. This tendency raises questions about Ryanair's commitment to sustainability, as the highlighted intentions appear to prioritise operational safety over significant environmental advancements.

Furthermore, the vagueness inherent in these statements underscores the need for consumers and stakeholders to critically evaluate the concrete outcomes of Ryanair's commitments. Without substantial evidence of achievement in sustainability, the company's pledges may serve as a strategic tool for enhancing corporate image rather than reflecting genuine accountability towards environmental goals.

## 6. Conclusions

The examination of Ryanair's 2021 Sustainability Report, titled "Aviation with Purpose," reveals the complexities inherent in the airline's operational approach to transparency and corporate accountability. It also underscores a strategic shift in prioritising sustainability within its organisational framework. The transition of the Sustainability Report, in 2021, from a component of the annual report to an independent standalone document indicates a substantial evolution in Ryanair's sustainability reporting practices. This change reflects an increasing recognition of the significance of environmental considerations in the airline's operations and strategic priorities. By concentrating on the year 2021, this analysis highlights a pivotal moment in Ryanair's commitment to redefining its sustainability narrative.

However, despite this positive shift, the analysis reveals troubling discrepancies between Ryanair's assertive claims of being Europe's "cleanest and greenest" airline and the evidence available for public scrutiny. Employing Critical Discourse Analysis (CDA), corpus-assisted language analysis, and Systemic Functional Linguistics (SFL), the research uncovers a nuanced interplay between Ryanair's language use and its perceived transparency.

Firstly, the analysis indicates a strategic pattern where Ryanair emphasises positive environmental initiatives while systematically omitting critical data necessary for a



comprehensive stakeholder evaluation. This selective disclosure suggests that the airline's claims about transparency in its environmental reporting are not as robust as would be required for fostering genuine stakeholder trust.

Secondly, the linguistic strategies evidenced in the report often utilise vague terminology, diluting the specificity and overall reliability of the outlined commitments.

Furthermore, the analysis of mood and modality in Ryanair's communication reveals an inherent reliance on language that suggests accountability rather than confirming it. Notably, the frequent occurrence of modal verbs like "will" paired with terms like "continue" and "ensure" indicates a tendency to focus on future intentions rather than presenting achievements. This focus on aspirations rather than concrete actions leaves room for ambiguity and raises critical questions about the depth of Ryanair's current commitments to sustainability.

This tendency reinforces a narrative that prioritises enhancing corporate image over providing clear, measurable indicators of progress regarding environmental responsibility. Ultimately, while Ryanair's 2021 Sustainability Report strategically aligns the company with public sustainability expectations, its transparency and accountability remain limited. To genuinely improve transparency and foster stakeholder trust, Ryanair must prioritise providing more thorough and verifiable data. This alignment is crucial for bridging the gap between narrative and reality, thereby reinforcing the trust necessary for long-term corporate sustainability (Kaptein 2008).

This study highlights the significant role that language and omission play in shaping public perception and underscores the urgent need for ongoing scrutiny and dialogue within corporate environmental reporting, particularly in the aviation industry (Bansal and Roth 2000). While this analysis has limitations, such as focusing on a single airline company and analysing a singular edition of its Sustainability Report, it sheds light on the broader challenges of corporate transparency faced by the transport sector. The insights gained regarding the airline's climate action efforts underscore the necessity for critical scrutiny of information and genuine commitment to environmental responsibility.

Future research may explore how airlines can effectively translate sustainability goals into robust communication practices that reflect their true environmental impact. A deeper understanding of this area may help pave the way for a more sustainable aviation industry. In the case of Ryanair, the findings reveal that visible data does not necessarily translate into clear understanding, potentially leading to misunderstandings and accusations of greenwashing.

## Acknowledgements

This research was carried out with the support of the Italian Ministry of University and Research, as part of the national research project PRIN: “Communicating Transparency: New Trends in English-language Corporate and Institutional Disclosure Practices in Intercultural Settings”, Grant number PROT 2020TJTA55, Years 2020–2022.

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