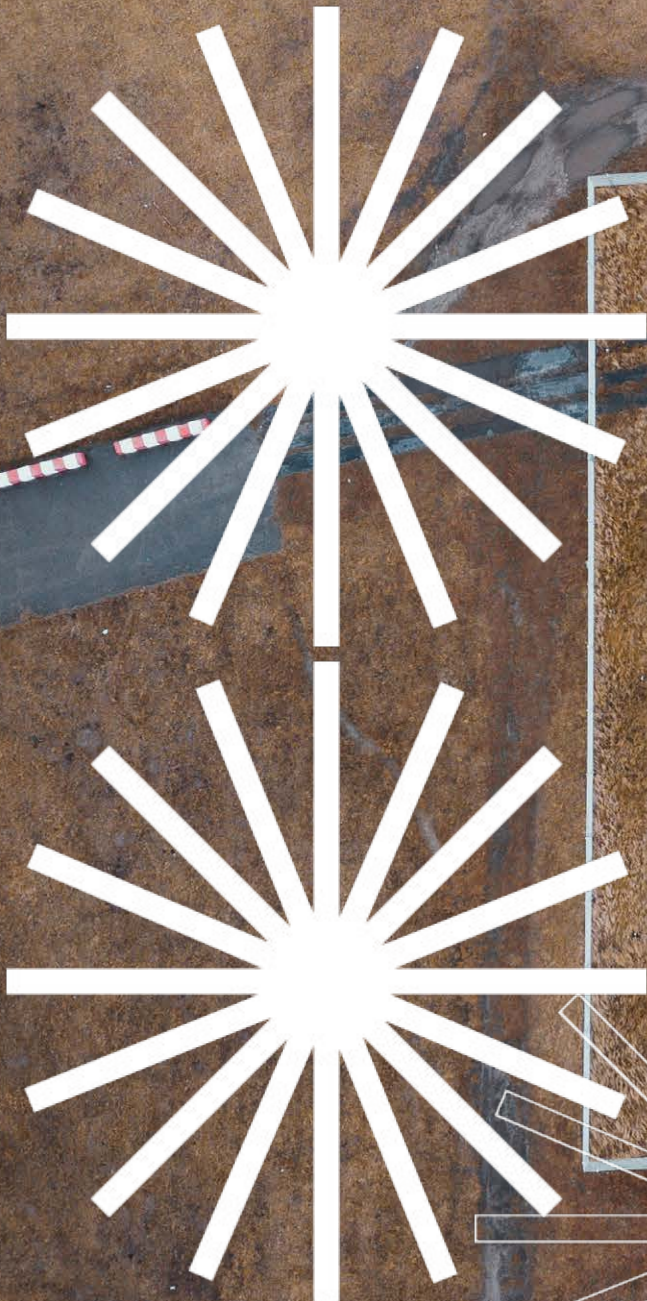


Aviation
Environment
Federation



ANNUAL REPORT

2022



Contents

1 The year in review

2 Aircraft noise and airspace

3 Net zero and challenging airport expansion

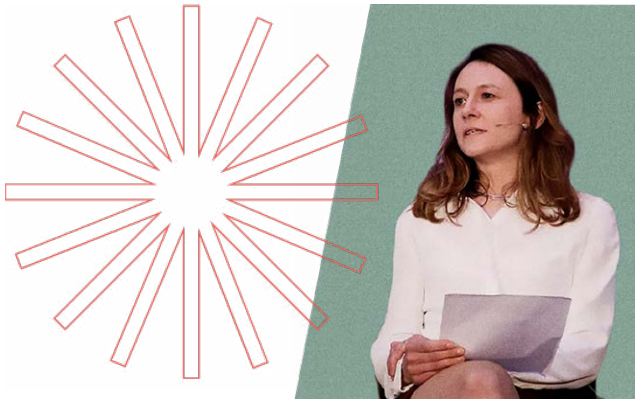
4 Air quality

5 International policy work

6 Media and public outreach



1 The year in review



“Until the government sets out a realistic net zero trajectory for the sector, and the industry is on track to outperform it, additional airport capacity should be off the agenda.”

Cait Hewitt, quoted in [The Guardian](#), 05/22

In the journey towards decarbonising the aviation sector, 2022 will be remembered for two events: the setting of a UN long-term climate goal for international aviation, and the UK Government’s Jet Zero strategy. The UN goal, which is detailed later on in this annual report, is symbolic of global action, even if the agreement took six years to finalise after the Paris Agreement came into force. But if this UN aspirational goal provides a platform for international cooperation, it also highlights the need for those states with large or mature aviation industries to show leadership and ambition.

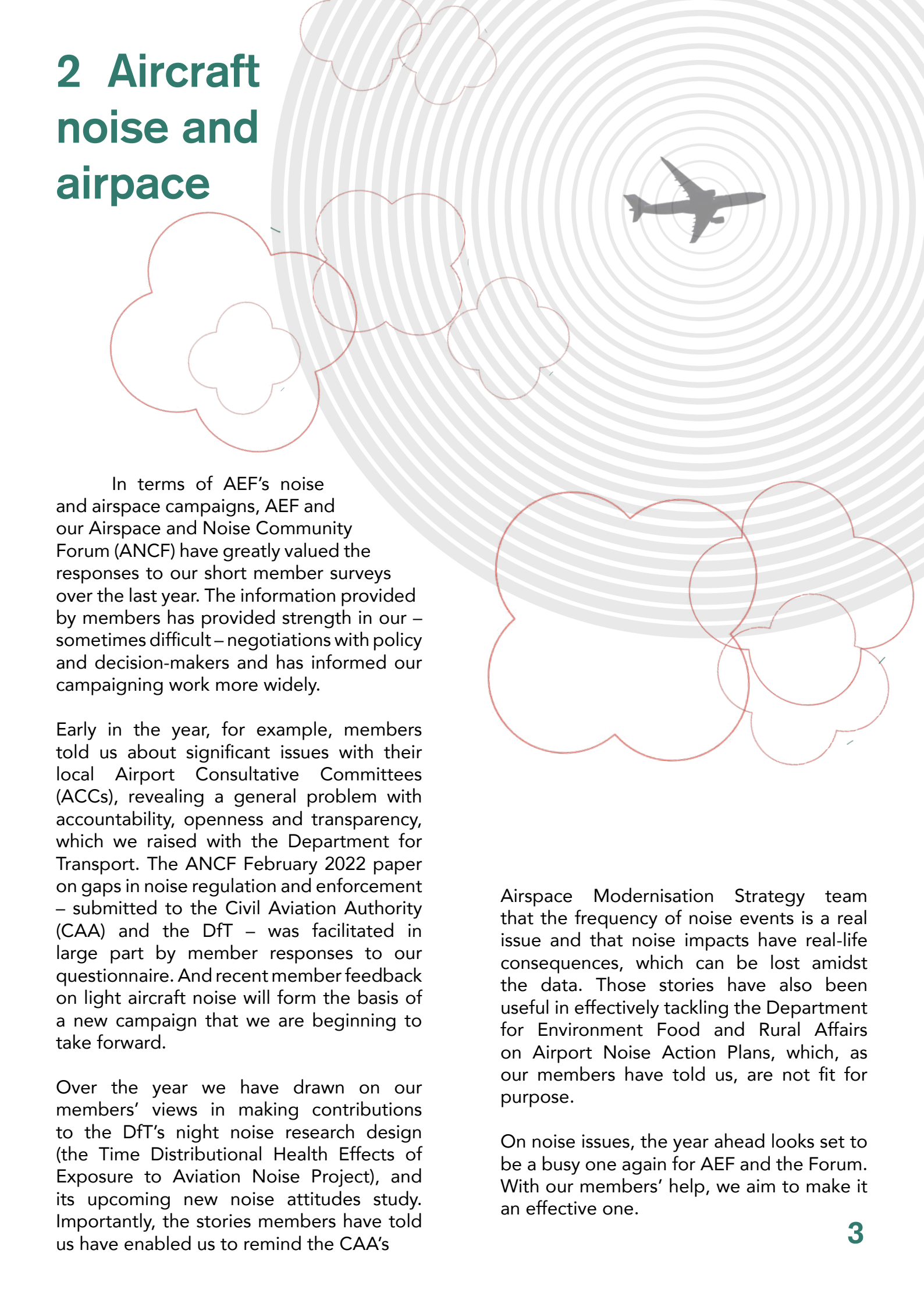
We spent the first half of the year setting out what this could mean for the UK’s own net zero aviation strategy, commissioning work from a leading consultancy to provide supporting analysis and evidence.

Unfortunately, the Jet Zero policy was a disappointment, focusing on technology

and ‘sustainable aviation fuels,’ but failing to identify the risk and costs that could prevent these measures from scaling, and ignoring the need to take a cautious approach towards demand until solutions can reach the market. It has been good to work collaboratively with other NGOs on the challenges of net zero aviation, and equally pleasing to see the involvement of several community groups.

Our members are increasingly engaged in national policy issues, and we were delighted to have started 2022 by creating AEF’s Airspace and Noise Community Forum, which brought together AEF member groups impacted by aircraft noise and the Aviation Community Forum. The new Forum has been meeting regularly, and its work and progress can be followed on a dedicated page on our website.

2 Aircraft noise and airspace



In terms of AEF's noise and airspace campaigns, AEF and our Airspace and Noise Community Forum (ANCF) have greatly valued the responses to our short member surveys over the last year. The information provided by members has provided strength in our – sometimes difficult – negotiations with policy and decision-makers and has informed our campaigning work more widely.

Early in the year, for example, members told us about significant issues with their local Airport Consultative Committees (ACCs), revealing a general problem with accountability, openness and transparency, which we raised with the Department for Transport. The ANCF February 2022 paper on gaps in noise regulation and enforcement – submitted to the Civil Aviation Authority (CAA) and the DfT – was facilitated in large part by member responses to our questionnaire. And recent member feedback on light aircraft noise will form the basis of a new campaign that we are beginning to take forward.

Over the year we have drawn on our members' views in making contributions to the DfT's night noise research design (the Time Distributional Health Effects of Exposure to Aviation Noise Project), and its upcoming new noise attitudes study. Importantly, the stories members have told us have enabled us to remind the CAA's

Airspace Modernisation Strategy team that the frequency of noise events is a real issue and that noise impacts have real-life consequences, which can be lost amidst the data. Those stories have also been useful in effectively tackling the Department for Environment Food and Rural Affairs on Airport Noise Action Plans, which, as our members have told us, are not fit for purpose.

On noise issues, the year ahead looks set to be a busy one again for AEF and the Forum. With our members' help, we aim to make it an effective one.

3 Net zero and challenging airport expansion

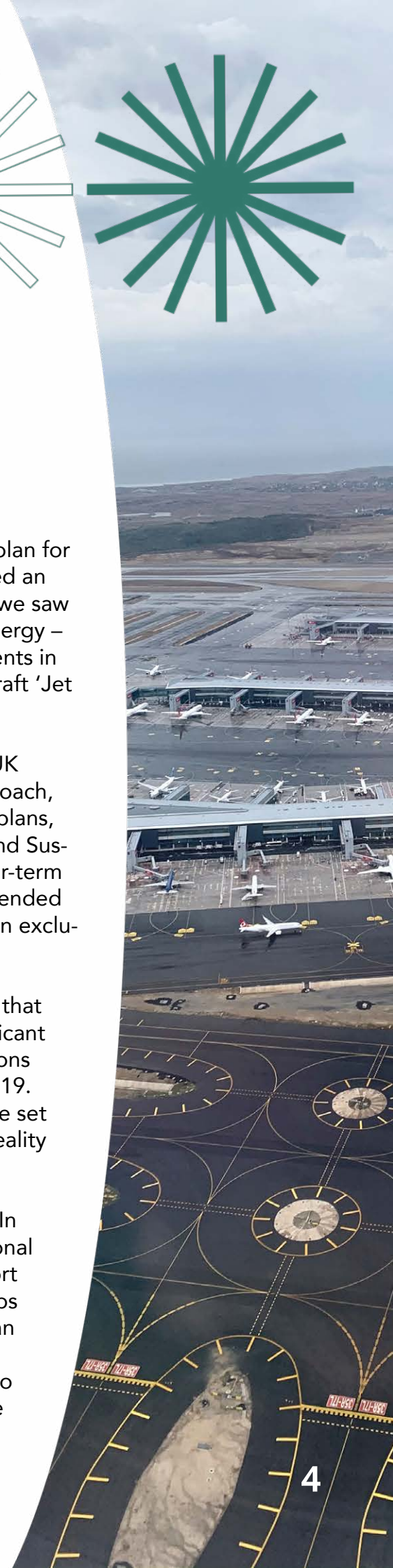


At the start of 2022, we were awaiting the Government's plan for delivering its commitment to net zero aviation by 2050. We feared an overly techno-optimistic strategy and wanted to challenge what we saw as the key weaknesses in this approach. So we asked Element Energy – which had previously undertaken work for government departments in both Westminster and Scotland – to undertake a review of the draft 'Jet Zero Strategy' which had been published in 2021.

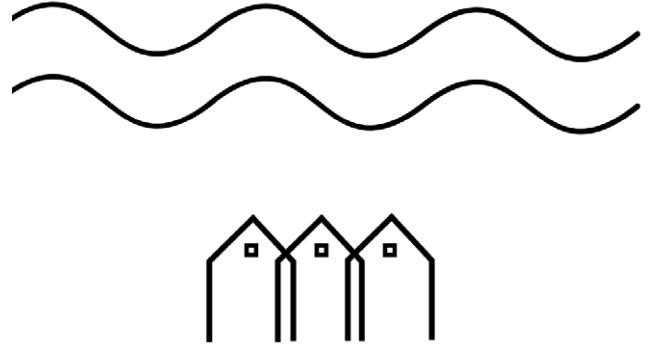
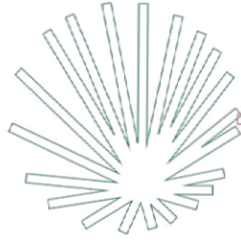
Their report for AEF, "The role of aviation demand reduction in UK decarbonisation," was pretty damning of the Government's approach, emphasising the high level of risk throughout the Government's plans, calling out unjustified assumptions on rates of new technology and Sustainable Aviation Fuel take-up, and highlighting the need for near-term emissions reduction. We launched the report in May at a well-attended online event and had good coverage of the findings in a Guardian exclusive.

The final Jet Zero Strategy was published in July on a day so hot that UK flights were being cancelled due to melting runways. A significant and welcome change from the draft strategy was that the emissions modelling no longer allowed for any increase over the level in 2019. But very few policies to actually deliver emissions reductions were set out. We'll continue to highlight the gap between ambition and reality in the Government's approach to regulating emissions.

One very useful step would of course be to stop airport growth. In May, we coordinated a joint letter to ministers from leading national environmental groups setting out our opposition to any UK airport expansion. AEF also worked with a number of our member groups challenging airport growth applications, including appearing as an expert witness on climate change at a planning inquiry at Luton. We'll continue to question the justification for expansion, and also the policy that permits it on the basis of 'jam tomorrow,' because allowing aviation growth on the basis of fuels and technologies that are all in the future isn't optimistic, as ministers like to claim; it's reckless.



4 Air Quality



Nearly every household in the UK is affected by poor air quality* and airports could be an important contributor. Studies have shown very high concentrations of particulate matter around airports, and that polluted air associated with jet engine combustion can drift several miles.

To tackle poor air quality health impacts, the Government's 2021 Environment Act stipulated the need for air quality targets. Defra's 2022 consultation on its proposed environmental targets included two for air quality:

1. An Annual Mean Concentration Target (AMCT) to reduce PM2.5 to 10 micrograms per cubic metre of air by 2040.
2. A Population Exposure Reduction Target (PERT) – a 35% reduction in population exposure to PM2.5 by 2040.

Defra received 49,810 answers to its questions about these targets. Of those responses, 90% – including AEF's – said both targets lacked ambition. We were unimpressed that the AMCT was based on World Health Organisation guidance that was 15 years out of date. Current WHO guidance (2021) recommends a reduction of PM2.5 concentrations to 5 micrograms per cubic metre of air as soon as possible. Defra must, we said, set a target to achieve the WHO recommendation by 2030.

We also noted Defra's failure to include a PM2.5 emissions cap (in line with current regulations) in its air quality targets, and its decision not to monitor near-source locations, including airports. These decisions, we said, looked related: an emissions ceiling could problematise the Government's support for air passenger growth.

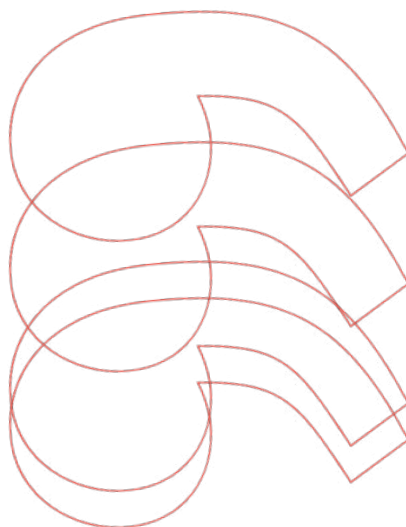
In addition, we expressed concerns about:

- the absence of a precautionary approach to ultra-fine particles;
- a failure to anticipate the air quality impacts of new major infrastructure projects and other developments, including airport expansion;
- a governmental record of failing to meet legally binding air quality targets.

Despite receiving overwhelmingly negative responses, Defra has retained its proposed air quality targets, and has not included an emissions ceiling or revised its monitoring plans: greater ambition, it said, would be unrealistic. AEF rejects this. One small, but significant step the Government could take would be to withdraw its commitment to increased capacity at airports. As we stated above, we'll continue to apply pressure on this point.

* Evidenced by Central Office of Public Interest's recent [map](#).

5 International policy work



ICAO Building, Montreal

ICAO's 41st Assembly concluded with an agreement to set a long-term goal for international aviation of net zero by 2050. AEF was in attendance at this gathering of 193 states in Montreal, as part of the environmental NGO coalition ICSA, the International Coalition for Sustainable Aviation. ICSA supported the agreement, having advocated for a similar target with interim milestones and a commitment to consider how non-CO2 impacts could be included in the future. While ICAO's agreement did not include these additional conditions, ICSA's statement in response to the agreement said that the net zero goal provided new hope that the aviation industry will align itself with the Paris Agreement. It also issued a warning, however, that the hard work needs to start now to deliver the target, and that given the climate crisis, we cannot afford any further delays. As a next step, ICSA called on governments to ensure global aviation emissions peak by 2025 as a first milestone.

The Assembly's decision to adjust the baseline for CORSIA, ICAO's offsetting scheme, found less favour with AEF and the NGOs. All emissions above the baseline

must be offset, and it had been set originally at the average aviation emissions in 2019 and 2020. ICAO agreed to amend this to 2019 only for the first three years of the scheme to account for the impact of the Covid pandemic, but the Assembly had to decide what should happen next. The final outcome agreed on 85% of the 2019 level, an improvement on the current position but still weaker than the original decision.

ICSA has been encouraging greater transparency in the ICAO environmental work programme and we were pleased to see that high-level meetings in the run-up to the Assembly provided live streaming and publication of papers in real-time. On the technical work programme, work is underway to potentially tighten the stringency of subsonic noise/CO2 standards in 2025.

6 Media and public outreach

In 2022, AEF was interviewed, quoted or mentioned in 98 media stories. We also gained an 11% increase in Twitter followers. At the beginning of the year, we contributed to The Guardian's big story on Ghost Flights and had a letter published in The Observer. Our joint NGO letter calling for a moratorium on airport expansion and criticism of the 'Jet Zero' strategy also had good coverage later in the year. The Element Energy report AEF commissioned, highlighting the risks of 'Jet Zero', was also covered by The Guardian, and our webinar to disseminate the findings was well attended by journalists, politicians and policymakers. We also published 20 of our own articles on topics including APD, greenwashing and our consultation responses, which have been used by journalists.

Finally, AEF worked closely with a coalition of NGOs focusing on encouraging businesses to reduce their air travel emissions. We plan to begin recording and publishing our own travel emissions, starting in December of 2022.



1. Tim Johnson, Director 2. Cait Hewitt, Policy Director 3. Deborah Lovatt, Head of Planning & Outreach 4. Tim Thomas, Finance Officer 5. Charles Lloyd, Lead, Airspace & Noise Community Forum 6. Florence Long, Communications & Admin Officer 7. Max Throter, Campaign Communications Officer

Fundraising and finances

We aim to keep membership fees affordable to ensure that everyone can have access to our advice and information service. We are grateful to our funders and donors for helping to subsidise the costs of providing these services, and for supporting our work programme more generally. Apart from membership fees, AEF's work is dependent entirely on philanthropic and charitable funders. We do not receive public funds or donations from industry. AEF continues to operate within budget and maintains a positive balance of funds. To ensure appropriate scrutiny of our work programme and to promote good governance, we are grateful for the oversight provided by our Executive Council, which is elected annually by our membership.

AEF's aim is:

- to protect the environment, public health and quality of life through securing policies and measures that ensure effective limits on noise, emissions and other environmental impacts from aviation.

AEF's objectives are:

- to seek effective legislation, policies and other measures by working with local, national and international policy-making and legislative bodies;
- to promote practical solutions through consultation and co-operation with AEF members, regulatory and public bodies, the aviation industry, and others;
- to support our members and affected communities in liaising with decision-makers and other stakeholders;
- to provide advice, analysis and information;
- to publicise and promote the role and responsibilities of the Federation.