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To: The Rt Hon Mark Harper MP, Secretary of State for Transport
CC: Baroness Vere of Norbiton, Parliamentary Under Secretary of State (Aviation, Maritime and Security)

Department for Transport

28 April 2023

Re: The government's "zero emissions airport" consultation creates a misleading impression that aviation emissions are being dealt with.

Dear Minister,

We are writing to you as a coalition of environmental organisations and aviation experts to express our concern that the Department's current consultation on a "2040 zero emissions airport target" risks pushing the UK's climate targets off track in this crucial decade for action. It risks creating the false impression that flights will be zero emission by 2040, which is likely to lead to increased levels of flying, pushing emissions up further. While we appreciate any action the government is willing to take towards cutting emissions from the aviation sector, we believe that the current approach to airport emissions risks doing more harm than good.

Decarbonising airport ground operations is relatively easy and simple, given existing government policies and targets on power and vehicle decarbonisation. Flying planes without causing huge amounts of greenhouse gas emissions will be extremely difficult and expensive, and will take at best many decades to achieve. Only around 5% of emissions from aviation come from airport operations and

surface transport;¹ the rest arise from flights arriving to and departing from an airport. We were therefore extremely concerned and disappointed to read that the government intends the zero emissions airport policy to provide “a social licence for growth”.

There is significant opposition to airport expansion both from local communities blighted by the noise and pollution and from climate experts who highlight the huge emissions increases that will be locked in by airport growth. The Climate Change Committee has advised that “there should be no net expansion of UK airport capacity unless the sector is on track to sufficiently outperform its net emissions trajectory”.

We are therefore extremely concerned that the approach of framing airports as “zero emissions” and intending this to licence further growth is one of deliberate misdirection, with the aim of obscuring the reality that growth in aviation will undermine the UK’s legally binding climate targets.

Airports are already making false claims about their climate impacts which are misleading consumers. For example, Heathrow airport claims that its projects will allow it to “hit our net zero goals in the air and on the ground by 2030,”² despite the airport having no plans to have net zero air operations by 2030. Ten UK airports have achieved the airport industry’s “Level 3+ Carbon Neutrality Status”,³ or higher, which permits airports to still produce greenhouse gas emissions directly from their operations providing they are offset, and makes no mention of emissions from flights. Many of these airports are currently seeking permission to expand, which would lock in additional millions of tonnes of emissions per year. Members of the public may not understand that airports’ claims about their own emissions or climate impacts exclude emissions from flights, and will therefore end up with the incorrect impression that their flight is not contributing to the climate crisis.

¹ <https://cp.catapult.org.uk/report/feasibility-of-zero-emissions-airport-operations-in-england-by-2040/>

² www.heathrow.com/content/dam/heathrow/web/common/documents/company/heathrow-2-0-sustainability/Heathrow_SustainabilityReport2022.pdf

³ www.bristolairport.co.uk/corporate/news-and-media/news-and-media-centre/2021/12/bristol-airport-achieves-level-3-carbon-neutrality-status/ or <https://www.airportcarbonaccreditation.org/about/6-levels-of-accreditation/neutralty.html>

It is clear that the current system by which airports set out their approach to aviation emissions is not fit for purpose and could seriously mislead the public, and we are concerned that the government's current plans will worsen this. If the government does not intend to actively greenwash the aviation sector and falsely reassure the public that emissions from flights will be zero by 2040, then a change of approach is urgently needed.

We therefore call on the government to take the following steps:

- Bring in an immediate moratorium on all airport expansions in line with the CCC's recommendation.
- Require all UK airports to complete standardised reporting on emissions from flights, not just from their ground operations, and including the non-CO2 impacts which make up two thirds of the warming caused by aviation.
- Reframe the 2040 target as "zero emission airport operations", or similar.
- Issue guidance to airports that they must not describe themselves as "zero emissions", "net zero" or any similar terms without clarifying that this applies only to the 5% of their emissions which are not caused by flights.

We would like to request a meeting with you to discuss our concerns in more detail.

Signed,

Possible

T&E

AEF

Green Alliance

Opportunity Green

Greenpeace

Friends of the Earth

Campaign for Better Transport