

2040 zero emissions airport target

Personal Details

Q1. Your (used for contact purposes only):

name? Cait Hewitt

email? cait@aef.org.uk

Q2. Are you responding:

on behalf of an organisation?

Organisation details

Q4. Your organisation name is?

Aviation Environment Federation

Q5. Your organisation is:

a non-government organisation?

Defining airport operations

Q6. Do you agree or disagree with the proposed definition of airport operations for the target?

Don't know

Emissions scopes

Q10. Do you agree or disagree on the target being applied for the Kyoto gases as described in the GHG Protocol?

Agree Disagree Don't know

Carbon dioxide (CO₂)

Methane (CH₄)

Nitrous oxide (N₂O)

Hydrofluorocarbons (HFCs)

Perfluorocarbons (PFCs)

Sulphur hexafluoride (SF₆).

Provide further detail if you disagree with the listing.

As we go on to argue in response to question 15, we believe that the 2040 airports target should include a reporting requirement relating to scope 3 emissions from aircraft in cruise (not just landing and take-off). This reporting should reflect the fact that two thirds of the global warming from aviation has so far been caused by impacts not captured by the definition of Kyoto gases, as they are specific to aviation – principally NO_x and contrails. Discussion continues about what policy approach should be implemented to address these impacts, not least given potential trade-offs in tackling non-CO₂ and CO₂ impacts. Prominent atmospheric scientists as well as campaigners, however, agree that in the context of public information provision it is more misleading to exclude any estimate for aviation's non-CO₂ impacts than to include one, albeit as a global average that takes into account wide variability in the actual non-CO₂ impact of each flight (particularly in relation to contrail formation). We support the use of the Kyoto gases described in the GHG Protocol for the purposes of airport operational emissions covered by the target, but recommend a wider definition for the reporting of aviation emissions to take account of the above.

Emission sources in scope of the target

Q11. Do you agree or disagree with the list of Scope 1 and 2 emissions sources for airport operations?

Don't know

Emissions sources in scope of the target

Q20. Do you agree or disagree, that a requirement should be included as part of the target for airport operators to report their Scope 3 emissions in line with ACI requirements at levels 4/4+?

Agree

Emissions sources in scope of the target: explanation

Q21. Explain your response.

While in general we welcome the setting of ambitious climate targets, we are concerned that the proposed 2040 airports target risks doing more harm than good in terms of the decarbonisation of aviation if not clearly accompanied by full information about the emissions from aircraft. The approach risks both diverting attention away from the more challenging task of decarbonising flight and confusing the public about what emissions are being reduced. Under present accounting arrangements for attributing GHGs to the aviation sector (for example, as reported in the UK inventory and the modelling basis for Jet Zero), aviation emissions relate to the GHGs emitted by civil aircraft operators. Airport scope 1 and 2 emissions do not fall within this category and have not been included in the Government's Jet Zero trajectory. Reductions in airport scope 1 and 2 emissions and a target for zero emission airports by 2040, while welcome, will not have any impact on the industry's ability to decarbonise flying.

With this in mind, it is deeply concerning to read that the Government intends the zero-emissions airport policy "to provide a social licence for growth". We note that the target will apply only to 5% of air transport sector emissions according to the analysis commissioned by the Government from Mott Macdonald and Catapult, and that meanwhile "aviation will become one of the world's largest emitting sectors by 2050" according to the ministerial foreword to the consultation. The approach therefore gives the impression of deliberate misdirection in order to counter the argument that aviation growth could undermine our climate ambition.

The target risks perpetuating the confusion surrounding claims made by airports about their environmental credentials. It has long been the case that airports have been able to claim 'carbon neutral' status on the basis of some combination of actual and net (achieved by way of offsetting) emissions reductions from their scope 1 and 2 operations. This has typically led to accusations of greenwashing, since the airports' main source of revenue – the operation of flights – has generally been excluded from these calculations. Members of the public are unlikely to be aware of this distinction, viewing the airport business as a whole rather than as a series of different activities, businesses and 'scopes'. In this way, airports can give themselves (and perhaps indirectly the aviation sector) green credentials that are misleading.

If it is not the Government's intention to greenwash aviation emissions or to give false reassurance to the public (who are very likely to make a mental link between 'green airports' and 'green flying'), then the 2040 zero emissions airport target should come with obligations related to aviation emissions. Some community groups believe that aviation emissions should be directly included in the scope of the target. There is a strong climate case for increasing the ambition of the target for aviation in this way, and it would provide a clear focus for action at the airport level. We note that the Dutch government has committed to capping CO₂ from international flights departing airports in the Netherlands and that one option it is considering for doing this is the imposition of a cap at the airport level.

We recognise, however, that to impose an earlier date (2040 rather than 2050), and an actual rather than a net target for flying would represent a step change compared to the ambition of the Jet Zero Strategy announced in July 2022 and that the Government may consider it premature to implement this change. A requirement for airport operators to report their flight emissions on a regular basis would represent an alternative approach that would complement but not directly impact the Jet Zero Strategy process. We agree very strongly, therefore, that the target must include a requirement for public reporting of Scope 3 emissions for aircraft in flight.

As well as supporting transparency, a reporting requirement could also help to standardise the way airports address scope 3 emissions today. Flight emissions data is sometimes included in airport sustainability documents, but otherwise may only appear in the context of planning applications or in the periodic demand and CO₂ forecasts published by the Government, so there is currently a gap in accountability in this area given the lack of regular reporting. In the majority of cases, scope 3 emissions are not quantified, and where data is provided, there are differences in methodology.

Some airports are beginning to report aircraft emissions, though this is often not consistently done. For example, Heathrow's net zero plan now notes that "95% of Heathrow's carbon footprint is from aircraft". Yet its 2022 Sustainability Report says that the projects the airport has in place "will keep us on track to hit our net zero goals in the air and on the ground by 2030" without making clear that it has no plans to achieve net zero emissions in the air by 2030. Since the Government has now committed to the achievement of net zero emissions by 2050 including the international aviation and shipping sectors, these emissions will in future fall within the scope of the UK's carbon budgets, making them an important consideration in the context of airport planning. Transparency should be required across the sector, using a standard methodology.

In terms of the methodological approach, we have some reservations about the ACI guidance for calculating flight emissions. First, as indicated in response to question 5, we believe that at least in the context of public information, it is important to an estimate for aviation's non-CO₂ impact as well as the impact of CO₂. There is no advice or guidance on this issue in the ACI manual except that in the context of biofuel use, airports may report non-CO₂ impacts on a voluntary basis.

Secondly, we are uncomfortable about the ACI's advice that in most cases biofuel use may be treated as zero emission. While in ACI's guidance this is assumed to apply to the airport's operational emissions rather than to scope 3 emissions, airlines may increasingly begin purchasing alternative liquid fuels and may want the use of those fuels to be recognised in any carbon reporting requirement, so it will be important to clarify a biofuel reporting policy. We would urge transparency on the part of airports about

Q21. Explain your response.

the quantity of biofuel purchased and about the estimated net emissions reduction from use that fuel on a lifecycle analysis basis. We can envisage no cases in the foreseeable future, however, in which this net reduction would be zero. Information on the purchase of biofuel should be presented in parallel to the total estimated actual emissions generated by flights (rather than airports simply making a deduction to that figure when presenting total aviation emissions).

As an alternative to using the ACI guidance, the basis for emissions reporting of flights could be informed by the CAA's current work on developing a methodology for calculating the CO2 impact of flights on a route by route, airline by airlines basis. Together with the CAA's existing data on flight operations from UK airports, CO2 information from flights could easily be presented on an annual basis by the CAA. It should then be mandatory for airports to report this alongside its progress towards zero emission operators. Such an approach should help with consistency of data across airports, and help avoid any unnecessary administrative burdens.

Airports subject to the target

Q31. Do you agree or disagree that there should be a minimum threshold based on the size of the airport below which the target does not apply?

Disagree

Threshold on airport size

Q32. Explain your response.

If it is possible to achieve zero emission airport operations at some UK airports we see no reason why it can't be achieved at all airports. In relation to the reporting requirement for aviation emissions, some smaller airports, including those specialising in freight or in business jet operations, generate large emissions on a per movement basis. All airports on which the CAA already gathers movement data should be included, as well as airports like Farnborough which cater for business aviation.

Airports subject to the target

Q33. Which metric should be used to determine an airport's size?

Air traffic movements

Explain your response.

Our preference is for no minimum size threshold to apply. If a threshold is introduced it should be on the basis of ATMs rather than passengers to ensure that freight and business jet operations are adequately captured.

How to ensure the target is implemented

Q35. What policy option do you think is most appropriate for the implementation of the target?

Legislative requirement

Q36. What are your views on a voluntary approach to implement the target?

In relation to aviation emissions reporting, we can see no reason for this not to be a mandatory requirement for all cases where the CAA can provide appropriate data. Voluntary approaches are likely to generate distrust and inconsistency in comparison.

Measuring and reporting of emissions

Q54. How frequently should progress towards the target be reported?

We would suggest annual reports.