Aviation
Environment
Federation

ANNUAL REPORT 2025

Contents

2025 in review

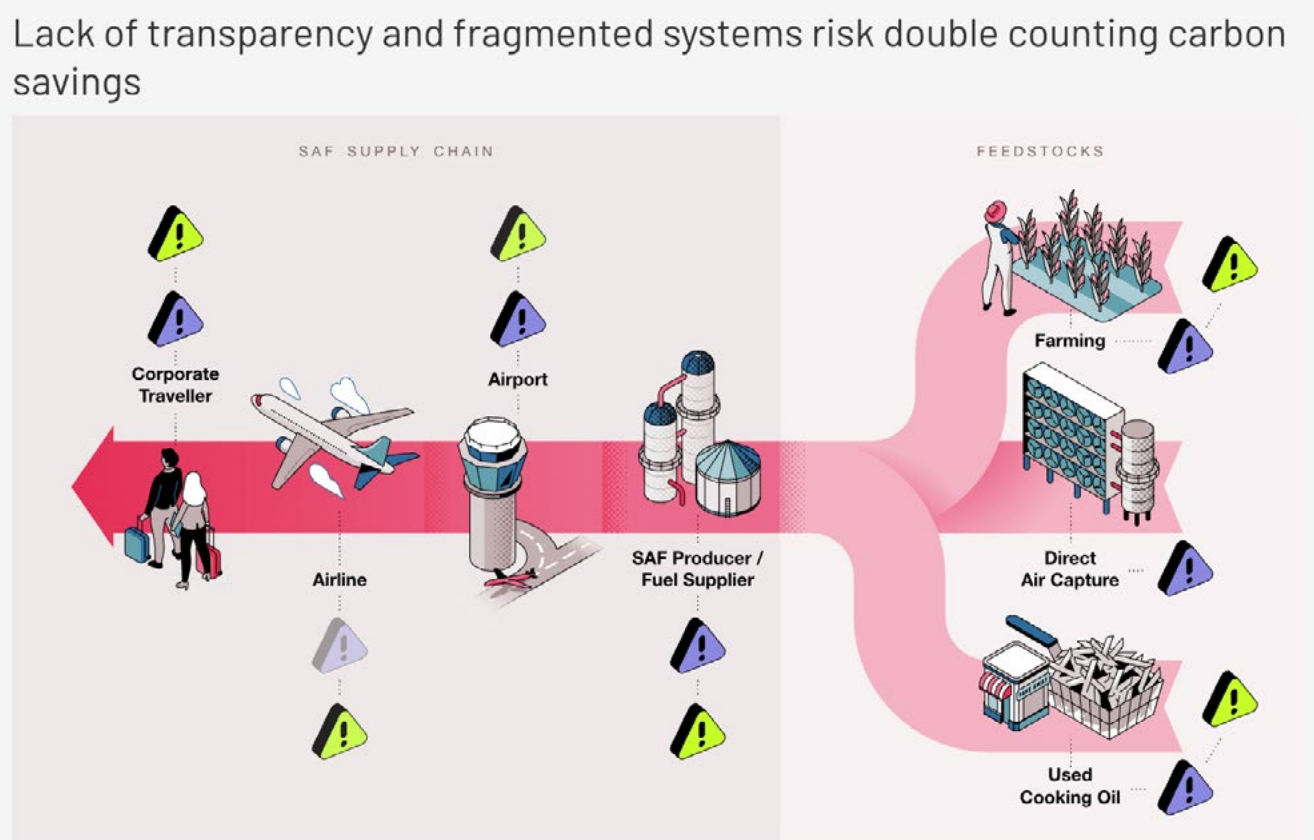
When communities impacted by aircraft noise first came together at the Charing Cross Hotel in the mid-1970s to form a national federation, it's difficult to imagine that they were thinking it would still be relevant fifty years in the future. But in 2025, AEF reached that milestone, marked by a celebratory evening in September when members, funders and staff, past and present, came to share stories and memories, and to raise a glass to the organisation's longevity, successes and endurance.

The breadth of activities highlighted in this annual report shows how far the AEF has come since those formative years, and no one would have been prouder of its achievements than founder Moyra Logan.

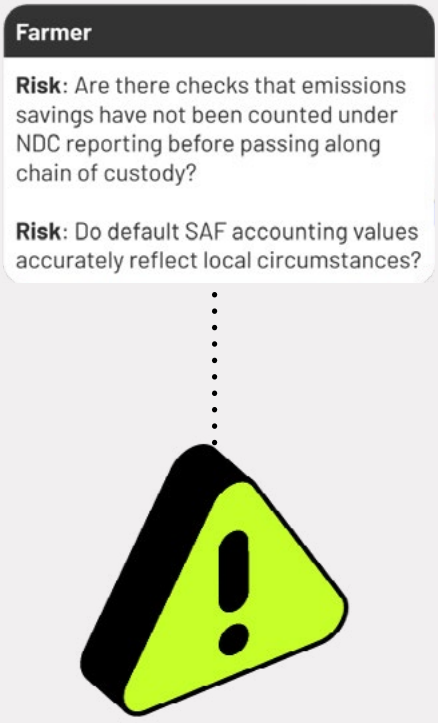
Moyra, receiving an MBE

Sadly, Moyra passed away just months before the 50th anniversary event, but supported by a trawl through the archives for photos and memories, her role and valued contribution was remembered as part of the evening's celebrations.

In 2025, we focused on airport expansions, carbon budgets, airspace modernisation and the triennial ICAO Assembly, as well as promoting the climate benefits of avoiding contrails. Contrails work included participating in the Jet Zero task and finish group on contrail avoidance which culminated in a report to the Government recommending a large-scale trial and a governance structure. We also took part in the Jet Zero task and finish group on how aviation can accelerate investment in greenhouse gas removals, another important issue if we are going to achieve net zero. Read on for a more detailed look at some of the highlights from the last twelve months, and don't forget to subscribe to our newsletter and our periodic review of the headlines to keep up to date in 2026.



AEF created an interactive diagram demonstrating different risks along the SAF supply chain.



Double counting and incomplete documentation in global accounting of emissions reductions from SAF

The advent of the UK SAF mandate in January 2025 has seen a surge in imports of alternative aviation fuels to the UK from all around the world. Although the Department for Transport maintains that the rules governing what kinds of fuels are allowed are robust, they remain opaque. AEF wanted to trace the complex chains of custody some of these fuels journey through – from feedstock harvesting, to production, to transportation and finally being burnt in a plane – and identify where there may be risks that emissions savings were counted multiple times ('double counting'), or where systems may lack clarity on where claimed emissions savings have genuinely occurred.

In our report, "Double Counting and incomplete documentation in global accounting of emissions

reductions from SAF", written by the Sustainable Energy Systems Research Centre at the University of Bath, the key challenges we identified were with regulatory capacity. All new claims need to be processed by the Department for Transport's Low Carbon Fuels team, and many of the fuels have crossed multiple borders, interacting with complex global supply chains. We discovered conflicting and overlapping frameworks, including differing Life Cycle Assessments (LCA) and differing calculations on carbon intensity depending on where the feedstock was sourced. Incomplete paper trails mean that evidence of sustainability is not always being passed from fuel suppliers to airlines, and efforts to set up a global independent database have faced teething troubles. At best, this leaves consumers and corporate buyers confused about the nature of emissions savings claimed across a complex international value chain, at worst it means that the genuine environmental integrity of some types of SAF could be at risk.

Since the report was published, AEF has been contacted by a number of journalists researching this very question, giving real world proof that certain fuels and feed-stocks which may be environmentally questionable are coming into the UK. Subsequently, we confirmed with the Department for Transport that the publicly available statistics do not track the physical import or export of SAF into and out of the UK (they simply track what the fuel supplier has claimed), nor do they publish the name of the company importing, nor do they reveal where the fuel is produced (only where the feedstock came from originally).

Is SAF the most efficient path to economy-wide decarbonisation?

The complexity of relying on SAF to decarbonise aviation doesn't end there. While the theory behind displacing fossil fuels and replacing them with "sustainable" alternative fuels is sound, one question that has been repeatedly overlooked in evaluating SAF's decarbonisation potential is whether these feedstocks are best used in creating jet fuel. As the aviation industry clamours to access scarce supplies of used cooking oil, black bin bag waste and even sewage, alternative uses of these waste resources in other economic sectors are often overlooked.

In many cases, these waste feed-stocks are already being used in other sectors. The best example is biodiesel, which is made from used cooking oil. If all this oil was suddenly diverted to aviation fuel, what would this mean for decarbonisation in the road-haulage sector? Another example is renewable energy, which can be combined with green hydrogen to make e-fuels. This is a very energy-intensive process - but what consideration has been given to how much of this scarce renewable energy should be diverted to e-fuels? Or should it go to electrifying the road fleet or powering homes more cheaply?

In our report, "The Best Use of Scarce Materials: Is SAF the most efficient path to economy-wide decarbonisation?", Matt Finch of EcoMatters Consulting explored these complex economy-wide questions. While the answer may change as other industries decarbonise faster and no longer need access to waste materials, or additional renewable energy capacity means that electricity prices in the UK fall, our analysis showed that as yet there is not a single feedstock for which the answer to that question is an unambiguous yes..

Giving Wings to contrail mitigation: A template for international cooperation

Contrails, or to give them their full title, condensation trails, are a regular sight in the skies over the UK, criss-crossing each other in the wake of aircraft flying at altitude. These contrail clouds, formed when aircraft pass through cool and saturated air, make a significant contribution to climate change. In fact, the science tells us that aviation's non-CO_2 climate impacts – and contrails are responsible for the majority of these impacts – represent two thirds of aviation's climate warming impact to date. And yet they don't feature in any climate goals or targets for the sector.

The lack of action to date has, in part, been down to scientific uncertainties, but there is sufficient understanding to conclude that reducing or eliminating contrails could provide climate benefits. Unlike carbon dioxide emissions that remain in the atmosphere for centuries, the impact of contrails can be measured in hours, weeks and months. With warnings that the Paris Agreement's aim to limit temperature rises to 1.5°C may already be out of reach, tackling contrails could buy us valuable time. Improved prediction of the meteorological conditions that give rise to contrails creates an opportunity for air traffic controllers to reroute aircraft into regions where they are less likely to form.

Contrail mitigation has been gaining interest among policy makers, but as yet there are no plans for a large-scale avoidance trial. As most contrails are observed over Europe and the North Atlantic, we believe the UK is well placed to take an international lead; but it cannot act alone. We asked Opportunity Green (OG) to explore the mechanisms that could form the basis of an international agreement on contrail mitigation. OG examined existing international treaties that address matters of atmospheric pollution and found that the most effective international treaties share common themes including the utilisation of executive committees or working groups, and procedures to promote compliance. The research also identified that a non-legally binding form of cooperation at the outset is likely to provide a more flexible framework that could be quicker to negotiate.

An example of contrails forming in the sky

In 2025, AEF continued our political engagement through a variety of different avenues.

Government inquiry into airport expansion and environmental targets

In response to ongoing Government support for airport expansion, the Environmental Audit Committee (a cross-party select committee) led an inquiry into whether airport expansion can be compatible with climate and nature targets. AEF submitted comprehensive written evidence to the committee outlining how there are major gaps in accountability for emissions that leave no guarantees that airport expansion will not compromise the UK's ability to meet our climate commitments. AEF's Policy Manager, Celeste Hicks, was subsequently invited to give evidence in person alongside Green Alliance and the University of Cambridge's Whittle Laboratory. Our evidence fed into the committee's final report, published in October, which outlined a series of recommendations covering economics, air and noise pollution and the climate impacts of expansion. Select committees can be infleuntial in shaping policy and we expect to engage further with the Environmental Audit Committee and the Transport Select Committee on a current inquiry into air pollution and possible scrutiny on the revision of the Airports National Policy Statement.

Celeste Hicks, speaking at the Environment Audit Committee's inquiry into whether airport expansion can be compatible with the UK's climate targets.

Reform of private jet taxation

At the start of 2025, AEF fed into a consultation on extending private jet taxation to cover a wider selection of jets. Previously, the higher rate of air passenger duty (APD), designed to apply to private jets, only covered jets of 20 tonnes or more that are equipped to seat fewer than 19 passengers. This definition excluded the majority of private jets, with only 12 of the top 50 most used private jet types in Europe meeting this criteria. With so many jets being charged a lower rate of APD, the Government proposed to extend the scope of the higher rate to cover all private jets. These changes followed on from the Autumn 2024 announcement of a 50% increase in the higher rate which takes effect on 1st April this year. The new scope of the higher rate, confirmed in November, will now cover all private jets over 5.7 tonnes.

Carbon budgets

Carbon budgets (CB) set limits on economy-wide emissions over 5-year periods to help with setting the trajectory to reaching net zero by 2050. The Government typically legislates these 12 years in advance, with CB7, covering 2038-2042, due to be set this year. In February 2025, the Climate Change Committee (CCC) provided its advice on this budget limit, with detailed sectoral breakdowns in their statutory report: The Seventh Carbon Budget. Whilst the Committee did not restate their previous recommendation of no airport expansion without a capacity management framework, the report is clear that managing the growth of aviation demand will be essential. AEF continues to regularly engage with the CCC around aviation policy.

In October, The government published their plan for carbon budgets 4-6, covering 2023 to 2037. This report, called the Carbon Budget and Growth Delivery Plan, was delayed as two previous versions had been taken to court by a coalition of NGOs including Friends of the Earth. The plan realies heavily on SAF, and, for the first time, carbon offsets. As the analysis only goes until 2037, it is now expected that new evidence to 2050 (and beyond) will be produced as part of the Airports National Policy Statement review, which AEF will be engaging with throughout this year.

Party Conferences

In September, AEF chaired an event at the Labour Party Conference titled, “Great British Aviation: how the UK can lead the future of flight”. The event was run alongside the New Economics Foundation, Safe Landing, Zero Avia and Possible. Ruth Cadbury, the chair of the Transport Select Committee, was the keynote speaker. The conversation looked at the various flaws in policy relating to airport expansion covering climate change, economics and impacts on communities.

Celeste Hicks, chairing an event at the Labour Party Conference

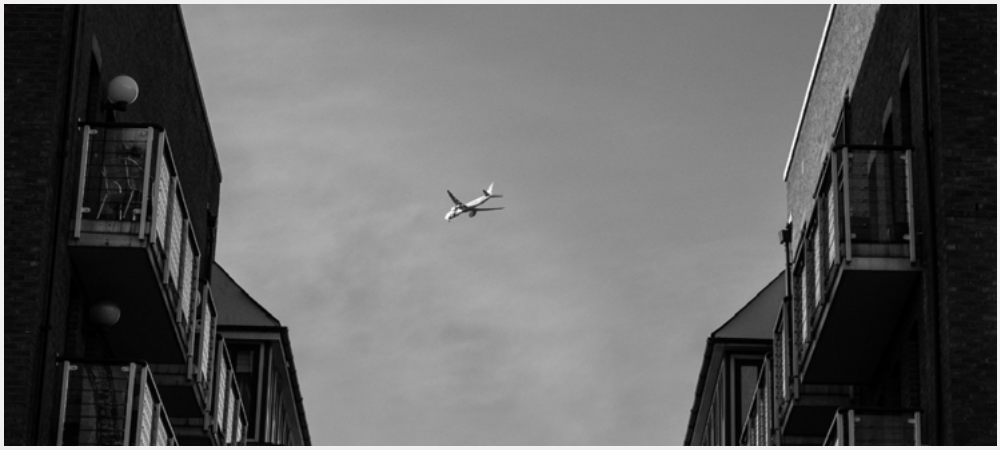
We attended the Lib Dem party conference shortly after to better understand their current approach to aviation. They have a number of MPs in constituencies near airports (largely Bristol, Gatwick and Heathrow) that are well positioned to speak up for communities. Across the NGO network, we have also been in touch with campaigners who attended the Green and Reform conferences to give good coverage across the political spectrum, something that is looking increasingly important as polling indicates a deviation from the traditional two party system.

Noise pollution and community

In 2025 we continued to put member's voices at the centre of our work, and in October, we published a case story supplied by a member who lives near Southend Airport: "Plane exhausted: a story about disrupted sleep and being able to do little about it". Despite planning restrictions intended to limit disruptive night flights at the airport, multiple exemptions and lack of meaningful oversight have left some residents exposed to sleepless nights resulting from cargo and business jet flights. The airport, we were told, "acts with impunity", highlighting a lack of meaningful oversight, regulation and accountability in terms of noise impacts.

Towards the end of 2025, the Government launched a series of consultations on airspace modernisation, including proposed revisions to CAP1616 (the policy document underpinning airspace change proposals) and to the Air Navigation Guidance. The intention of the revisions was clear: to reduce opportunities for community input into airspace change proposals, weaken environmental and community objectives while prioritising industry capacity maximisation. In our responses, AEF objected strongly to these proposals. We simultaneously wrote to fifty MPs highlighting our concerns, raised the alarm at a Parliamentary event, and got the story published in The Guardian.

In 2026, while continuing to make our members' voices heard – on our website and in meetings with key decision-makers – AEF will challenge top-down, industry-led policies and processes within the airspace modernisation strategy as a whole.



ICAO, non-CO2 and Google

Our international work representing NGOs at the UN's International Civil Aviation Organisation (ICAO) was dominated by preparation for, and participation in, the plenary meeting of ICAO's environmental committee and, later in the year, the 41st Assembly (when all 193 member states convene in Montreal, an event that only happens every three years). At February's environment committee, the meeting agreed to increase the stringency of both the current noise standard by 6 EPNdB and the CO_2 standard by 10% (for new large aircraft from 2031). While 6 EPNdB may sound like a modest improvement, this is the sum of the measurements across three noise measurement points. In other words, the average improvement at any one measurement point is only 2 EPNdB. The NGOs were pleased to get support from the meeting to look at the benefits and costs of reducing aromatics in aviation fuel. Although ICAO does not set the standards for fuel composition, this work could generate international discussion in the future about the potential climate, air pollution and economic opportunities of minimising the aromatic content in fuel.

The NGO coalition had less success in persuading the Assembly that effective delivery of its net zero by 2050 target requires interim targets to maintain progress. We had argued that with only 25 years left to get to net zero, ICAO cannot afford to pause. We propose three steps to build on current efforts. Setting interim targets is critical to guiding ICAO's work and creating the certainty required to invest in international aviation's decarbonisation at the required pace. But there was a positive response to our push to have stronger language on recognition of non-CO_2 impacts, and the environment committee is now engaged in an exercise to map ICAO's work on non-CO_2 and identify the gaps.

Outside of ICAO, AEF continues to participate in the Advisory Group for the Travel Impact Model, developed by Google, which allows major flight booking platforms to display the carbon intensity of each flight when presenting search results. Supplementing CO_2 calculations, with a methodology for displaying the likely contrail impact of each flight was a major achievement in 2025.

ICAO's Assembly takes place in Montreal, Canada. Environmental NGOs have been attending since 1998.

A message from the Chair of the Executive Council, Rachel Webb

It's a great privilege to chair AEF's Executive Council (EC), especially in its 50th year. Our anniversary celebration in September was an enjoyable opportunity for me to meet with AEF members and partner organisations. We also fondly remembered Moyra Logan, who founded AEF in 1975.

The EC serves in a voluntary, advisory capacity and helps to ensure that the wider interests of AEF members and funders are taken into account in the formulation and implementation of policies and positions. We offer advice and support to the staff and have strategic oversight of the running of the organisation.

Each EC member brings unique insight and expertise from their own experiences of campaigning and from their professional lives. For example, we have helped to shape AEF's work on how best to employ Artificial Intelligence, advances in aviation technology (e.g. drones), the impact of forever chemicals at airports on the wider environment, wildlife management, and night noise dispensations.

The past two years have seen some members of our team retire after many years of dedicated service. I'm keen to find new volunteers who can bring to the table their own skills, experience and interests, for example: corporate law, governance, aviation policy, campaigning and communications, finance and funding, noise, emissions and environmental impacts. Meetings are hybrid, so location is not a hindrance.

If you would like a friendly chat about possibly joining the EC, please email info@aef.org.uk with your name, which airport(s) concern you, and which topics are of particular interest, be they noise, greenhouse gas emissions, economic impact, or anything else.

EC members serving in 2025:

Nic Ferriday

Rob Gibson

Nick Hodgkinson

Mark Middleton-Smith

Tim Thomas,

Tim Walker

Rachael Webb (Chair)

Tim Johnson, AEF's Director, thanking AEF members, staff and EC members at the 50th Anniversary event.

AEF's objectives are:

- to seek effective leglislation, 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 decisionmakers and other stakeholders;
- to provide advice, analysis and information;
- to publicise and promote the role and responsibilities of the Federation.

aef Aviation Environment Federation

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