

## Aims and Objectives

The objectives of the Federation are as follows:

- to foster a climate of opinion which takes full account of the environmental issues arising from aircraft and aerodrome use;
- to promote a relationship between the environment and aviation in which the detrimental effects of aviation on quality of life and on the natural and man-made environment are kept to a minimum;
- to encourage wide discussion of the problems involved and to seek practical solutions;
- to consult and co-operate with local, national and international governments, the aviation industry, regulatory authorities, universities, professional institutions, research bodies, and any others for the purpose of reducing noise, disturbance and all forms of pollution by technical and operational means;
- to pursue these objectives with policy-making and legislative bodies - local, national and international - so that laws and policies include measures for effective environmental protection;
- to provide relevant advice and information to assist its members;
- to publicise and promote the viewpoint of the Federation through the media and through representation among bodies responsible for aviation matters as appropriate.



## Key Government watchdog recommends moratorium on airport expansion

*Tim Johnson, director; [tim@aef.org.uk](mailto:tim@aef.org.uk)*

Twenty UK-wide government departments and agencies, thirty one-to-one meetings, six workshops, a spread of stakeholders ranging from Shell to Friends of the Earth, and one year for the Government's environmental watchdog and one of its closest think tanks to come up with a set of recommendations on UK aviation policy... and the Department for Transport dismissed them the same day they were published!

On 20<sup>th</sup> May, the Sustainable Development Commission and IPPR published *Breaking the Holding Pattern: a new approach to aviation policy making in the UK*. AEF supported the project by helping to secure its funding, and hoped that it might help to move the debate beyond the usual lines of division and look at aviation sustainability issues in the round.

In fact, the study found that there was such fundamental disagreement over key data on air travel in the UK – its benefits to the UK economy, its contribution to climate change, noise and air pollution, and the potential for technology to reduce aviation's environmental impacts – that airport expansion, including the proposed new runway at Heathrow, should be put on hold pending further research. After all, good policy-making requires a solid foundation and a coherent approach across government departments. The study found neither, highlighting the need for a wholesale review of UK aviation policy.

The report recommended that Government should

- set up a special commission to compile an updated evidence base on the economic, social and environmental benefits and costs of UK aviation
- consult the public and key stakeholders on the future of air travel in the UK, setting out policy options to stimulate a national debate, and
- incorporate the findings and recommendations of this special commission into the Air Transport White Paper.

## Did you know...



... that aviation has been exempt from noise nuisance claims ever since the 1920 Air Navigation Act was passed by Churchill to protect a fledgling industry?

Sadly the Department for Transport has so far stated that it fundamentally disagrees with the findings of the report and has dismissed the suggestion for further debate over airport expansion plans as "not a serious option."

AEF is supportive of the report's key findings and we hope very much that they will not disappear into the black hole of recommendations the Government finds inconvenient.



From SDC's webpage:  
[www.sdc-commission.org.uk/pages/aviation.html](http://www.sdc-commission.org.uk/pages/aviation.html)



## Rural tranquillity at stake, say opponents to NATS proposals

Nic Ferriday, air transport caseworker; [nic@aef.org.uk](mailto:nic@aef.org.uk)

Horse-breeders from Newmarket, rural residents and MPs concerned that noise pollution could be dumped on the countryside are among those opposing the airspace changes proposed by National Air Traffic Services. As reported in the last edition of *Flying Green*, in February this year NATS issued consultation documents on proposed changes to flight paths in the East and South-East of England - an area with a population of 12 million people and some of the UK's busiest airports.

Public interest in the proposals has been high, and the original deadline of 22<sup>nd</sup> May was extended to 19<sup>th</sup> June to allow more time for people to prepare responses. But many residents and campaigners felt that consultation documents had not been circulated widely enough and found NATS slow to respond to requests for information. To help explain the implications of the changes, AEF hosted a well-attended workshop with speakers outlining the proposals, setting these in the wider context of future changes, and detailing some of the impacts for Stansted and Luton airports.

To mark the last day of the consultation, campaigners held an event in central London. A letter signed by local residential, amenity and environmental groups and MPs was delivered to NATS headquarters stating:

.. “We are dismayed that over half a million people will be over-flowed for the first time. Life will never be the same again for many people living in both urban areas and in some of the most peaceful parts of the countryside. We are calling on NATS to listen to what the local communities which would be newly over-flowed are saying and to reconsider these proposals.”

AEF believes that shifting noise pollution away from towns and cities into currently tranquil areas does not present an adequate solution to the problem of aircraft noise - set to increase significantly as flight numbers grow. And we note that since improvements in fuel burn from the use of continuous descent approach and changes to stacking arrangements would be offset by increases in fuel burn from departures, these proposals cannot respond in any way to the urgent need to tackle the climate change impacts of aviation. A general-purpose ‘stakeholder’ meeting held by NATS and attended by AEF last month contained no detailed discussion of environmental issues, though NATS agreed to discuss these in a separate meeting.



## DfT review mirrors AEF research

Laura Simpson, policy coordinator; [laura@aef.org.uk](mailto:laura@aef.org.uk)

It might be wishful thinking, but the Department for Transport seems to be jumping on AEF’s ideas! In the last edition of *Flying Green* we introduced the launch of our research into the historical interaction between communities and aerodromes over noise issues, how effectively CAA 2006 powers have been used in response to community concerns, and whether more carefully defined and stringently applied central government solutions were necessary. Since then, the Department for Transport has launched a review of the 2006 Civil Aviation Act – legislation which granted airport operators statutory powers to set up noise control schemes and to fine aircraft breaching noise restrictions – and, as part of this process, is currently surveying the chair of every airport consultative committee to see how, if at all, these powers have been applied and whether legislative strengthening or reform is needed.

Though fairly infrequently used, Section 38 (4) of the 2006 act entitles the Secretary of State to direct airport operators to fix charges assisting central government policy- aimed at reducing annoyance factors, with a statutory requirement to consider nearby residents. Managers are placed under a duty to follow the Secretary of State's recommendations, with any negative impacts being avoided, limited, or mitigated. Section 78(8) also empowers the Secretary of State to instruct airport operators to install, operate and maintain pollutant measuring equipment, and provide measuring reports. If the operator fails to do so, a daily fine of £500 can be charged. Helpfully for communities affected by aviation impacts, Section 78A(8) requires managers to make payments equal to the amount of penalties received for breaches, to the benefit of local residents. The airport operator's jurisdiction to operate the above schemes does not prejudice the application of other non-financial methods of reduction and mitigation, so other helpful activities are not limited.

The information gathered by the DfT will be inputted into our research, alongside responses from our members with less formal roles in airport management. We encourage our members who have not yet returned their surveys to do so, so our data can be as representative as possible. If you have lost your copy or would prefer an email version, please contact me at [laura@aef.org.uk](mailto:laura@aef.org.uk) , or go to <http://www.aef.org.uk/?p=263> to fill out an online copy.



## Aerodrome licensing and the environment: mind the policy gap

*Tim Thomas, general aviation caseworker*  
[timthom@aef.org.uk](mailto:timthom@aef.org.uk)

All aerodromes operating flights for either public transport or flying training (see back page update for possible changes) are legally required to have a licence. This is stipulated in Article 128 of the Air Navigation Order (ANO) 2005. ‘Public transport’ includes any flights where either passengers or cargo are carried for a fare, but excludes those where passengers simply agree to share the cost of fuel. ‘Flying training’ operations include any activity connected with acquiring or altering a Pilots Licence, while excluding pleasure flights where a passenger who is a permanent or temporary member of a flying club briefly takes control of an aircraft.

There are a number of different types of licences. With a **Public Use** licence, the aerodrome publishes hours of operation and allows all qualified persons to use it on equal terms and conditions. All major airports hold public use licences. An **Ordinary Licence**, in contrast, relates only to the holder of the licence and persons specifically authorised by him or her. Both public use and ordinary licences can be either permanent or issued for a specific time period. **Permanent Licences** have no expiry date so remain operational until varied, suspended or revoked, **Temporary Licences** are valid for a period not exceeding 12 consecutive days and **Seasonal Licences** are issued for periods of more than 12 days, up to a maximum of 12 months.

Aerodromes are licensed by the Civil Aviation Authority (CAA), which has responsibility for ensuring that licence-holders are competent and exercise their duties appropriately. But the CAA has no direct legal duty to consider environmental issues in the licensing process, nor direct powers to impose environmental restrictions on aerodrome licences. These issues belong to Section 5 of the Civil Aviation Act 1982 and it falls to the Secretary of State to specify aerodromes for the purposes of that section. To date no such specification has been made despite requests.



## Emissions trading: the deal’s done but airlines get an easy ride

*Cait Weston, policy and communications officer*  
[cait@aef.org.uk](mailto:cait@aef.org.uk)

Emissions trading has become the Government’s key get-out card. Inclusion of aviation in the European emissions trading scheme (EU ETS), we have heard, will cap aviation emissions, ensure the sector pays its environmental costs, and help us meet our climate targets. After much wrangling between the European Parliament, The Council of Environment Ministers, and lobbyists from NGOs, airlines and others, a deal was struck on 8<sup>th</sup> July in Brussels for aviation to join the scheme from 2012.

A persistent problem in regulating the emissions from aviation is its stateless status – no nation wants responsibility for emissions that could, in theory, be allocated according to the nationality of the carrier, the place where the fuel was bought, or the nationality of passengers. EU ETS is a bold piece of international policy in that will sidestep the continued stalling of the International Civil Aviation Organisation - the UN body supposed to resolve these issues - and demand any airline operating flights to or from any European state to submit permits to cover emissions from those flights.

AEF has supported the inclusion of aviation in the ETS as a first step towards bringing the sector into line with the climate policies it tends to evade. But the Government’s grandiose statements about what the scheme can deliver conceal as much as they reveal. Aviation emissions will be given an *initial* cap (equivalent to the average annual emissions from 2004-2006), but if they emit beyond the cap they can simply purchase credits from other sectors or from accredited carbon offset projects outside the scheme. ETS will help to cover some of the climate costs of aviation, but it fails to take into account the costs of local air pollution and noise impacts. And it will be effective in delivering climate targets only if it incorporates those targets. The UK’s need to reduce emissions by 60-80% of 1990 levels by 2050 still looks stubbornly at odds with the trajectory for aviation emissions growth.

On its own, ETS as currently designed cannot deliver a sustainable aviation sector. AEF will continue to press for more stringent terms for the ETS, for transport plans that reflect climate goals, and for the additional fiscal and regulatory measures that are needed to deal with the range of environmental impacts of aviation.

## Pilot training could bring increased noise at unlicensed aerodromes

General aviation members should have received information about a consultation running from 7<sup>th</sup> April to 10<sup>th</sup> July about the Civil Aviation Authority's (CAA's) proposal to amend Article 126 of the Air Navigation Order to permit Flight Training in Aeroplanes and Helicopters from Unlicensed Aerodromes. We are grateful to those members who sent us copies of their responses. AEF shares the concerns of many of our members over the way the consultation was handled and the fact that the Light Aviation Study Group is completely industry-based and has no environmental representatives. This adds weight to the view of many communities that the CAA pays lip service to environmental impacts but fails to take them seriously when carrying out this type of consultation.

Flying training is based largely on aircraft flying repetitious circuits around the airfield to practise landings and take-offs, generally referred to as 'touch and go'. These circuits can be 1000 feet or lower and, at busy airfields, or in rural or semi-rural locations, the associated noise can be an ever-present feature. At present, the CAA requires training to take place at licensed airfields which are regulated from a safety perspective. The CAA has no jurisdiction over unlicensed airfields. We believe that flight training can bring significant noise, especially in areas with low background noise levels, and we remain concerned that the proposal will lead to the spread of nuisance. The only possible gain from the change is commercial, while the impact on what are now mostly tranquil areas has been given scant consideration and no proper Impact Assessment has been undertaken.



AirportWatch at the protest over flight path changes proposed by NATS

## News from our networks

In this edition we provide an update from the International Coalition for Sustainable Aviation. ICSA gives the AEF, and other environmental NGOs, observer status to attend and participate in environmental meetings of the International Civil Aviation Organisation (ICAO) – the UN specialised agency responsible for civil aviation.

### ICAO to respond to climate challenge?

At its last Assembly (the gathering of 190 contracting states), ICAO agreed to set up a high level committee to discuss a strategy to reduce greenhouse gas emissions. While this work is not scheduled for completion until 2009, ICSA has concerns that the outcome will fall short of many people's expectations. ICSA points out that the terms of reference do not seek a global solution, only a global framework where countries can pick measures suited to their industries – a menu that includes voluntary agreements, technology developments, alternative fuels and market-based measures.

Different approaches in different regions are not a problem if they all share a common goal, but the terms of reference do not seek to set such a target. Without it, ICSA is sceptical that ICAO can develop an effective response. You might assume that if ICAO does not deliver, the UN Framework Convention on Climate Change will pick up the challenge as part of its talks on a successor to Kyoto post-2012. But its own talks are scheduled to conclude in late 2009, leaving a short period of time to debate a topic with diverse political perspectives. The likely outcome is that aviation will, once again, be left out of any international climate agreement, unless ICAO and UNFCCC begin immediately to work together on their respective strategies.

One issue that is becoming increasingly clear to ICAO is that a growing industry with limited abatement opportunities is going to require access to carbon markets (from consumer offsetting schemes, to generating carbon credits for investment in clean technologies, largely in developing countries). To highlight the opportunities that exist, ICAO held a carbon workshop at its Montreal headquarters in June. Workshop presentations can be viewed at <http://www.icao.int/2008wacm/Documentation.htm>

Editor: Cait Weston

Published by: Aviation Environment Federation, Broken Wharf House, 2 Broken Wharf, London EC4V 3DT

t: 020 7248 2223 w: [www.aef.org.uk](http://www.aef.org.uk) e: [info@aef.org.uk](mailto:info@aef.org.uk) f: 020 7329 8160