

**Written evidence submitted by the British Airline Pilots' Association  
(BALPA) (AAS0027)**

***Preventing a winter of discontent and turbo charging the recovery***

**About us**

This submission to the Transport Select Committee's Inquiry into the recovery of UK Aviation is made on behalf of Britain's 10,000 commercial airline pilots represented by the British Airline Pilots' Association (BALPA). Over 80% of the UK's commercial pilots are members of BALPA and we are recognised as the main partner in more than 20 airlines covering all major UK operations.

**Recovery of the UK aviation sector**

The last 18 months have been the most devastating and challenging in the history of the aviation industry. The sector has seen up to 90% lower passenger levels as a direct result of COVID-19 and passenger confidence remains relatively low.

The UK's aviation sector has become the sick man of Europe, thanks to conflicting Government rules, and a myriad of different and expensive testing, isolation and vaccine documentation requirements. Our limited recovery to date is significantly behind the rest of Europe: the UK's airports are at the forefront of the worst affected by Covid. Data from September shows that Gatwick, the UK's second busiest airport pre-Covid, is the worst affected airport in Europe<sup>1</sup>, currently operating at -76% of traffic compared to 2019, and Manchester is the fourth worst at -56% of 2019 traffic. This is having devastating effects for both the employees and local community along with the UK's wider air connectivity and industry.

- ***The UK has fallen badly behind the European recovery: Government support is needed to catalyse the UK aviation industry and propel it ahead of its closest competitors.***

Before all of this, the UK was Europe's largest aviation market and the third largest aviation market in the world, after the USA and China. Nearly 300 million passengers travelled through UK airports in 2019: a record number. The

sector contributed £66bn to the economy (3.2% of the UK's GDP) and facilitated a further £26bn a year from tourism. Aviation also provided £8bn of tax revenue to the Treasury<sup>2</sup>.

The UK aviation sector as a whole employs about a million workers, with a further half a million jobs relying on aviation for the tourism sector. This is not just airlines and airports but also engineering, catering, head office functions, security and retail, among many others. One in four constituencies has over 1,000 people employed directly by aviation companies, and 60% have over 500<sup>3</sup>. Since the beginning of the pandemic, over 60,000 jobs have been lost<sup>4</sup>.

- ***Government, business and the public all stand to gain from a swift and full recovery.***

For 20% of pilots, Covid has caused a 100% loss of income. More than 2000 (or 1 in 5) professional flight deck crew have moved from an employed to an unemployed category of membership.

- ***Fire and re-hire tactics are shameful and should be outlawed in the UK.***

For the 80% of pilots who retained their jobs, it has meant prolonged periods with pay reduced by between 20% and 65% of 2019 values. Without either normal revenue or government support, airlines are again going to be asking employees to contribute towards reducing further losses. Employees cannot afford this any longer.

- ***Covid-19 has put an immense strain on employer – employee relations, yet negotiations have seen pilots supporting their companies through temporary negotiated reductions in pay and other terms. Employers using COVID-19 to permanently reduce terms and conditions once reasonable levels of business activity resume would be unacceptable.***

With the CJRS no longer available to bridge vital employees, such as pilots and engineers, to the point where revenue supports their employment costs; airlines are faced with one of three choices.

- To make them redundant, risking the recovery, as such skilled staff are not easy to recruit and train to a productive level in quick time
- To cover the cost of their employment from further borrowings, risking both the viability of the business and the recovery as it will be

competing whilst laden with disproportionate debt compared to European competitors

- Negotiate yet further reductions in the pay and conditions of skilled staff who have already contributed more than they can afford over the last 18 months.

Whichever of these difficult choices the airlines make, they are not in a position to ensure that such a large number of safety sensitive staff are made both skilled and resilient for the recovery in passenger numbers.

Resilience is the key challenge. The skills needed to work are analogous to 'riding a bike,' they are not easily forgotten and are quickly trained to competence. However, the need to become resilient, to be able to prioritise and manage workload in the real-world environment, is more challenging and needs both practice and exposure. These are both expensive, not required by the legal minimum return to work standards and yet, in this unprecedented situation are vital for safety.

The retraining minimum standards are designed to reintroduce a single crew member into an otherwise skilled and resilient system. This winter, we are looking to reintroduce 50% or more of the workforce back into a system which is itself not yet back up to speed.

Redundant pilots will be even more hard pressed to afford necessary steps to re-gaining employment such as licence revalidation or changes. Not having valid licences can be a barrier to interviews, even for pilots with significant experience. The costs involved in keeping pilot licences valid and current are higher than equivalents in almost any other industry, and those who have successfully secured employment following a redundancy should not be barred from applying for these funds, as non-flying jobs are not salaried to account for these costs.

Airlines should be able to reclaim costs from HMT for these to help tackle their large and fixed overheads.

- ***The full cost of legally required checks, license conversions and extra resilience programmes agreed with the CAA should be reclaimable from Government, whether claimed by pilots - in or out of work - or***

***airlines applying on behalf of their pilots. This needs to happen ahead of the return of demand i.e., during Winter 21/22.***

- ***For those redundant pilots, payment must be available in advance, so it is usable and helpful for those who don't have the means to pay expensive costs upfront themselves.***
- ***Unemployed pilots who have secured offers of employment conditional on securing a licence issued by a different authority (e.g. EASA/CAA/FAA) should be able to reclaim the full costs of doing so.***

Earlier this year, over 3,500 UK Pilots signed a letter to the Government to highlight the new and unfair post-Brexit licencing system that means UK pilot licences have been 'seriously degraded in value and utility'. The new state of play has actively prevented UK pilots, including those made redundant due to Covid-19, from securing UK jobs.

BALPA continues to campaign for a reciprocal Flight Crew Licence agreement between the UK and EU, which would benefit all airlines. This would address the imbalance following Brexit that only has a clear path forward, at present, until the end of 2022.

- ***The Government must address the imbalance in post-Brexit Flight Crew Licencing urgently.***

### **The traffic light system for international travel**

BALPA welcomed the recent reduction in restrictions announced by the Transport Secretary, especially for vital transatlantic routes. This is a positive step towards regaining public confidence in international travel, although it is far from what it was pre-Covid. Whilst respecting the need for public health, the constantly changing, confusing and politically (as opposed to data) driven traffic light system did nothing to help the aviation industry from facilitating safe travel, at a time when it needed it most.

Restrictions now must be in line with international measures, which the UK has had a strong hand in writing, so that fully vaccinated passengers can travel with the same ease as before Covid.

### **The cost of international travel**

The UK's aviation market is essentially an international one, with relatively little domestic traffic, and must be aligned with international measures to make the UK an easy – and not burdensome – place to visit, do business and connect through. BALPA therefore supports the scrapping of any type of testing for fully vaccinated passengers in line with the ICAO *Testing and Covid Risk Mitigation Measures Manual v3*.

- ***Government must subsidise, through the NHS, the costs of any testing that remains required for unvaccinated passengers or those coming from countries with very high risk***

### **Border readiness**

BALPA echoes longstanding calls from airports and airlines for more Border Force resourcing, and for services to be planned according to predictable arrival peaks and schedules. Government should also work with Border Force unions to aid effective planning: this is especially the case when the Government wants to ensure that the UK is more attractive to travellers and businesses than ever.

Airports must have dedicated or fast track crew lanes at every airport, usable by every crew member irrespective of the airline, to facilitate efficient crew movement at airports and preventing delays.

### **Regional and global connectivity**

Domestic aviation connectivity is an important part of the UK aviation industry, although a small part of it. The Prime Minister has strongly hinted at the Government's intention to remove the double domestic Air Passenger Duty burden. BALPA supports a cut of APD across the board to make the UK a truly competitive marketplace for new routes, airlines and connectivity.

This would strongly support those airlines focussed on domestic connectivity such as the re-formed Flybe airline after the loss of hundreds of jobs following its collapse at the start of the pandemic.

### **Sustainability**

The government's requirement for aviation to achieve net zero emissions by 2050 only entered the legislation in June this year. The consultation on the pathway to achieve it (Jet Zero) closed just last month with the final strategy not expected to be published for some time. BALPA submitted a detailed response to that consultation and has only copied the most relevant parts to this inquiry in this submission. Clearly there has not yet been time for the sector to have made significant proactive changes, especially given the devastating impact of the Covid pandemic.

Nevertheless, the effect of Covid has greatly reduced overall emissions – CO2 emissions from UK aviation year-to-date are down 71% compared to 2019<sup>5</sup>. Operational changes have improved efficiency in some areas, though fuel consumption is up in others. As traffic levels start to recover to pre-pandemic levels, we would like to identify some opportunities and learning points in order to capitalise on the changes Covid has brought.

### **Fleet suspensions and retirements**

When Covid struck, operators found themselves grossly over-equipped for the reduced traffic levels. Large numbers of airframes were sent to long-term parking, others were retired early and dismantled and orders for new aircraft delayed or cancelled. The majority of these airframes were older and inherently less efficient, giving a welcome boost to average per-flight fuel efficiency.

However, there is a risk that trend is temporary and may even reverse. Cash-poor operators owning their aircraft outright are likely to “sweat the assets” while being unable to afford new orders. Operators leasing aircraft can rarely escape their contracts early and continue to bleed cash paying for aircraft that are uselessly parked. Thus, all are forced financially to reinstate these old and less efficient aircraft before they can invest in new higher efficiency models.

### **Accounting for emissions during Covid**

The Jet Zero consultation trajectories all included a band of “Covid uncertainty” from January 2020 to December 2023 within which no emissions predictions are shown. Afterwards, levels are projected to have recovered to pre-2020 levels or slightly higher<sup>6</sup>.

As we near the mid-point of this uncertain stretch it is clear that the UK's recovery remains slow and muted. BALPA would like to see revised predictions

in the final version of Jet Zero based on real 2020/2021 data and an updated baseline from 2024. If – as widely suspected – emissions during the Covid uncertainly period were significantly less than had been assumed, then credit should be given for this progress albeit involuntary.

### **Airspace modernisation**

The greatly reduced traffic levels have enabled more efficient operation by almost eliminating delays and holding, facilitating direct-route flights, and enabling tactical flight-level changes en-route. New equipment requirements for oceanic routes (ADS-C surveillance + datalink<sup>6</sup>) and low traffic has also made the North Atlantic Track (NAT) system effectively redundant.

As traffic starts to grow, we should work hard to avoid a return to inefficient old practices, specific suggestions include:

- End the requirement to fly over specific waypoints when crossing FIR boundaries, particularly in/out and within Europe (SESAR).
- Review and relax altitude limitations on arrival and departure procedures, and between ATC sectors.
- Participate actively in improving Eurocontrol's flow management system to ensure airborne delays are continually minimised
- Avoid a return to NAT tracks; allow operators to plan optimal routings over the Atlantic.

### **Contrail avoidance trial opportunity**

While decarbonising aviation is a worthwhile goal, it will be a long, difficult, and expensive pathway. But carbon dioxide emissions are only responsible for approximately one third of aviation's total radiative forcing (global warming) effect, with the prime cause now thought to be aviation-induced cloudiness. This occurs when specific atmospheric conditions cause aircraft contrails to persist and expand into layers of cirrus cloud, which act as a blanket.

We have the means right now to end this important warming effect quickly, effectively at very little cost<sup>7</sup>. There is still some practical scientific work required to prove this concept, but the UK has both world-leading scientific<sup>8</sup> and operational<sup>9</sup> expertise to carry out the research. Moreover, the currently low traffic levels are a golden opportunity to perform the necessary studies. These research efforts, supported by the Government, will attract new talents

and ensure the UK's continuity in world-leading scientific and operational expertise.

The ongoing research indicates that areas with a higher occurrence of contrails can be avoided by aircraft thanks to highly developed meteorological prediction systems and as such, minimise the effects of aviation-induced cloudiness.

Rarely will there be an opportunity to make such a major environmental improvement at such little cost and difficulty. We urge the government to make the necessary funding and resources available to conduct a conclusive trial as soon as possible, and to act on the findings rapidly.

### **Economic fuel tankering**

As explained in BALPA's Jet Zero submission, we consider economic fuel tankering to be problematic on both environmental and practical grounds. Unfortunately, anecdotal evidence suggests that the practice is not only continuing but becoming more common perhaps due to increased fuel price differentials or operators looking to exploit every cost saving.

If a Sustainable Aviation Fuels (SAF) blending mandate is introduced, the resulting higher fuel costs would create a perverse incentive for operators to tanker cheaper non-blended fuel into the UK. This is not only environmentally self-defeating but would also give an unfair commercial advantage to non-UK operators.

- ***The UK should work with the EU to ensure our policies on economic tankering are aligned and apply to all companies operating into the UK/EU<sup>10</sup>.***

Indeed, the EU is already planning such regulation as part of its "Fit for 55" package. Whether through the voluntary agreement suggested in the government's recent Sustainable Aviation Fuel consultation or via primary legislation, we again urge prompt action on this important issue.

### **APU use on the ground**

The Covid pandemic has brought with it a requirement to ensure good cabin ventilation whenever passengers are on board, including on the ground. However, the provision of pre-conditioned air (PCA) on aircraft stands is at

best patchy at UK airports, forcing crew to run the aircraft's auxiliary power unit (APU) for extended periods.

APU use on the ground contributes significantly to local noise and air quality issues as well as avoidably burning several hundred kilograms of fuel per hour. Ground-supplied PCA should be routinely connected whenever it is available, should be made available on as many stands as possible and should be a required part of plans for all new or modified stands.

## October 2021

### Endnotes

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<sup>1</sup> <https://www.eurocontrol.int/sites/default/files/2021-09/covid19-eurocontrol-comprehensive-air-traffic-assessment-30092021.pdf>

<sup>2</sup> <https://www.aoa.org.uk/wp-content/uploads/2019/11/AOA-Manifesto-for-airports-2019.pdf>

<sup>3</sup> <https://airlinesuk.org/aviation-jobs-in-great-britain/>

<sup>4</sup> <https://travelweekly.co.uk/news/air/almost-62000-uk-aviation-jobs-lost-since-start-of-pandemic>

<sup>5</sup> Data Snapshot. EUROCONTROL, Sept 2021. <https://tinyurl.com/52khhkcp>

<sup>6</sup> Termination of temporary accommodation measures in the NAT Data Link Mandate (DLM) airspace due to COVID-19. ICAO, Feb 2021. <https://tinyurl.com/338rafmb>

<sup>7</sup> Updated analysis of the non-CO2 climate impacts of aviation and potential policy measures pursuant to the EU Emissions Trading System Directive Article 30(4), S. Arrowsmith, D.S. Lee, B Owen et al. (2020). <https://tinyurl.com/rhjb57u>

<sup>8</sup> The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018. Lee et al. Atmospheric Environment (2021): <https://tinyurl.com/3kmrjzsd>

<sup>9</sup> DecisionX: Net Zero. Satavia (2020). <https://tinyurl.com/b96539s4>

<sup>10</sup> Sustainable aviation fuels mandate (section 5.17) DfT. 2021. <https://tinyurl.com/5erh3xev>