

Transport Committee inquiry: Airlines and airports - supporting recovery in the UK aviation sector ~ Submission from Anthony Rae

Over the last two decades I have written aviation consultation responses particularly relating to climate change for organisations such as Friends of the Earth E,W&NI (including their submissions to the Airports Commission) and Campaign for Better Transport (their submissions to the Airports NPS). Based in West Yorkshire I've more recently (as convener of a group of transport campaigners) engaged with Transport for the North on their decarbonisation strategy; and contributed to the analysis of the proposals to expand Leeds Bradford airport.

1. This is the third response relating to the requirement for aviation carbon reduction that I've submitted in the last month, the two previous being evidence submitted to the Environmental Audit Committee inquiry into Net Zero aviation & shipping (available [here](#)) and the consultation response to the DfT's Jet Zero Consultation (JZC). The latter was substantially critical about the structural flaws in the JZC pathway and scenarios design, which it summarised as follows:

“This analysis of the Jet Zero consultation and its pathway scenarios has demonstrated that they are technically inadequate - so not ‘fit for purpose’ - but that this situation has occurred not accidentally, but deliberately and by design. As examples:

- the volume of transport demand, one of the two critical components of an emissions reduction pathway, has effectively been removed from the entire TDP analysis and framework

- instead there is an enforced overemphasis on technological type interventions, which have little constraining impact in the 2020s and which the consultation itself describes as uncertain. This has the consequence of increasing pathway risk, not that there are in any case adequate mechanisms to control that risk because no regulatory/policy frameworks constraining emissions to whatever are the annual set tonnages are being proposed.

- the proposed principal abatement measures tend to only act at the margin, and in the case of the largest of these (fuel efficiency improvements) the feedback loop between such efficiencies and *increased* demand and therefore *higher* (not lower) emissions has not been acknowledged.

- a justification for the continuation of the existing stance not to apply any airport capacity limits has not been provided, despite the fact that policy signalling in support of expansion must increase pathway risk. Instead it's simply asserted as a statement of belief.
- nor has a justification of the economic and social utility of major demand and capacity expansion been provided, despite the evidence that the UK aviation market is already comprehensively developed - following decades of DfT promotion - but benefits mostly a small minority of the population.
- a pathway scenario involving constraining demand (at whatever level but e.g capping it at its pre Covid maximum) has been shown to be a powerful tool to reduce emissions to lower levels, at earlier dates (so reducing cumulative emissions), and with greater certainty, but has not even been examined, and therefore isn't available to consultees.
- the tonnage of residual aviation emissions (at 2050, and cumulative) after all types of proposed abatement is excessive and its further reduction should be a priority objective for the JZ strategy. Again this is related to demand constraint, because the tonnage amount has been inflated by the +56/60% growth assumption incorporated in the scenario designs.
- the responsibilities of pathway 'owner' and implementers has been confused. The owner (DfT) has to establish a pathway that is at least compliant with CCC recommendations, commits to an implementation framework and then enforces its delivery, year on year. Implementers (airlines/airports) must be left with the responsibility and costs of meeting their pathway obligations. Instead the DfT owner has sought to construct a pathway that favours the implementers."

These flaws are so major that my consultation response called for JZC to be withdrawn as 'not fit for purpose'.

2. In this brief submission, I intend to address the committee's two questions about sustainability – 'The aviation sector's progress on reducing emissions to support the Government's aim to achieve net zero greenhouse gas emissions by 2050' and 'Maintaining a competitive UK aviation sector while ensuring the UK can achieve net zero greenhouse gas emissions by 2050' - but also touch upon the issues about 'how the aviation sector can support the UK's economic recovery after the coronavirus pandemic'; 'the potential merits of Government (a) financial, (b) regulatory and (c) other support to the aviation sector'; and about regional and global connectivity.

3. The most important point to make is the need to differentiate between the recovery of the aviation sector from the impacts of Covid on the one hand, and intentions to promote its continual future expansion on the other. Accepting that aviation was one of the sectors most hardest-hit by Covid impacts (passenger numbers declining from 297m in 2019 to 74m in 2020: a reduction of 75%), and that such drastic reductions in volumes - not just of passengers and flights, but consequently also emissions - have to be achieved by orderly longer-term policy change, the debate around 'recovery' should instead be framed as how to treat the 2020 disruption as an opportunity to get the sector on track to emissions reductions consistent with the UK carbon reduction pathway (as recommended by the Climate Change Committee in its 6th carbon budget report, and adopted by government). Included within the CCC framework was a recommendation that passenger demand be constrained to the 2019 level until 2035 (and only be allowed to expand thereafter should the emission circumstances at that time permit this) and with no net airport expansions *CCC Aviation Sector summary report, figure P8.2 Key outcomes & policy requirements* In other words, how should the inevitable rebound in emissions from 2021 onwards be appropriately constrained so that it merges into a descending glidepath across the 2020s and 30s as required by the CCC emissions trajectory?

4. From this perspective, the stated intention of the Department for Transport (DfT) - as a matter of deliberate policy - to instead promote:

- the continued expansion of passenger demand to 60% above 2019 levels and all the way to 2050 (*JZC Evidence & Analysis document, scenario assumptions*);
- continuing support for planning applications seeking expansion at every UK airport (*JZC footnote 39*); and
- an approach to 'constraining emissions' which rejects any consideration of demand constraint and solely utilises technological interventions which DfT itself admits will be delayed in implementation and shrouded in uncertainty and therefore risk *JZC para.2.22*

has to be understood as an explicit rejection by DfT of the CCC CB6 framework. With transport emissions as a whole already representing 33% of the total UK carbon budget (UKCB) in 2019, and even in CCC's CB6 pathway increasing that proportion to 35% in 2030, it can be seen that this reckless approach to future aviation emissions expansion also imperils not just the transport decarbonisation plan (TDP) pathways *TDP pages 47 & 126* but that for the

UKCB as a whole.

5. It is therefore absolutely essential that Transport Committee do not confuse **their concern for aviation's short-term recovery from the 2020 trough** back up towards pre-Covid 2019 volumes with **attempts by DfT and the aviation sector to undermine the UKCB pathway to Net Zero and the stability of the Climate Change Act process.**

6. In relation to the 'sustainability' questions, it shouldn't be necessary to point out to the committee that not only has the aviation sector at present made no 'progress on reducing emissions towards achieving Net Zero' - in that in 2019 its emissions were +85% above the Climate Change Act (CCA) 1990 baseline, and therefore are constantly and cumulatively eroding the remaining UKCB - but that under the JZC 'High Ambition' scenario its emissions will still be at that same level in 2030 (39Mt - 85% above 1990), and at 20Mt at the NZ 2050 enddate (20Mt - fractionally below 1990) (*JZC dataset High Ambition scenario cells E20&40*). The language of the question therefore conceals a serious untruth.

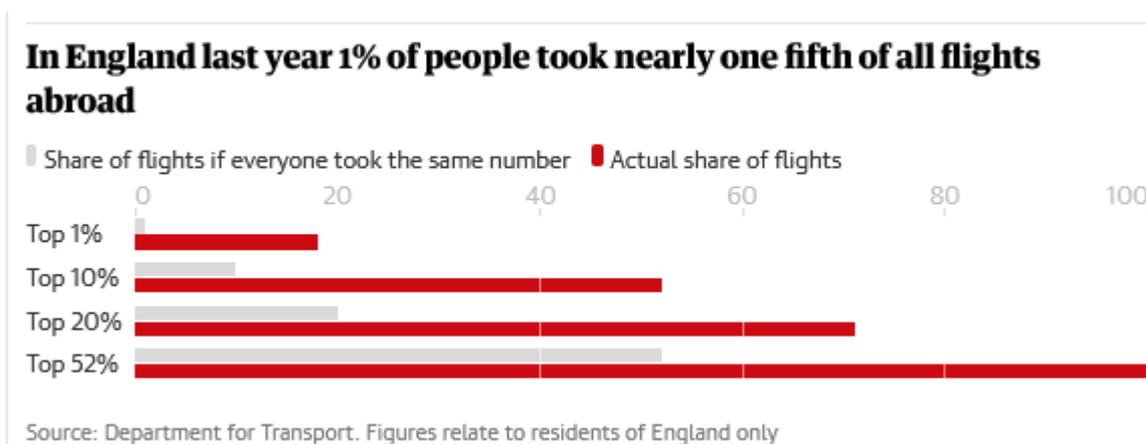
7. The problem with the 'competitive UK aviation sector' is therefore that it has already expanded the domestic passenger market such that the UK has one of the highest 'propensities to fly' in the world.¹ but at the expense of offloading its carbon impacts regardless of the consequences. The CCA requires that all economic sectors pursue their continued competitiveness within a framework that systematically reduces absolute emissions, rather than pretending to do so whilst actually undermining that framework in practice. It is unfair to all other economic sectors and *their* competitiveness if the aviation sector is treated with a completely privileged approach.

8. It follows that the aviation sector would best 'support the UK's economic recovery' by not seeking to undertake a carbon 'landgrab' of the increasingly scarce remaining amount of the UKCB as it ratchets down inexorably towards 2050. The argument in relation to stranded capital assets is sufficiently well-known to suggest that the over-expansion of and over-investment in an excess quantity of aircraft, runways and airport facilities cannot represent an optimal asset allocation for the future. Seeing that the sector has already received, particularly in 2020, an amount and type of financial support that the government judged appropriate, the implication that this intervention should be continued and extended to include regulatory or fiscal support - e.g proposed reductions in domestic APD - would only act to increase such

distorted asset allocation

9. The implication that the government's 'Global Britain agenda' requires some kind of intervention to re-establish global aviation connectivity beyond what the market itself determines is necessary is extraordinarily out-of-alignment with the UK's hosting of the international climate negotiations at COP26 in Glasgow, starting in just 2 weeks time. This is attempting, against the planetary 'Code Red' issued by the United Nations, to find every conceivable way of reducing emissions in order to prevent climate collapse. It is not attempting to continue superserving a tiny proportion of the population mostly for discretionary leisure purposes (see figure below). That the pro-aviation version of a 'Global Britain' agenda might be thought capable of competing with or sitting alongside the other one must be an indication of the extent to which the aviation sector and DfT policymakers are completely out of touch with climate realities.

10. Within the UK the same point applies. Transport services and infrastructure are going to have to undergo a beyond-challenging transformation, starting immediately, if transport emissions as a whole - which showed no reduction at all across the 2010s, static at 165Mt - are to be more than halved by 2035. This will have to involve modal shift away from high carbon modes like aviation and towards all other low carbon options, and therefore a rethinking of what 'regional connectivity' means in this new world. Continuing investment in high carbon approaches from the past is no longer possible.



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Endnotes

¹ <https://ourworldindata.org/carbon-footprint-flying> Per capita emissions from domestic *and* international flights, displayed as a table (not map)