

Written evidence submission from Victor

Victor welcomes the opportunity to provide a submission to the House of Commons Environmental Audit Committee on its inquiry regarding the challenges in reducing emissions posed by the aviation and shipping sectors.

We thank the Committee and its Secretariat for the courtesy of accepting a late submission. Victor would welcome the opportunity to expand its position and provide oral evidence to the Committee as it continues its work.

About Victor

- Victor, led by its founder Clive Jackson, have revolutionised the business aviation industry by bringing transparency to the private jet booking process and through its commitment to charting a path to Net Zero.
- Since 2019, we have led by example with a self-imposed carbon tax applied to all Victor flights, mandating a minimum 200% carbon offset against all carbon emissions. We have actively encouraged our frequent fliers to match that contribution and top up through our Unlimited Offset Program, which is administered through a series of UN accredited carbon reduction projects.
- Leading by its actions, Victor publishes its annual carbon impact report online. For transparency, the emissions and associated carbon credit retirement is audited by an independent third party. Victor raised close to \$450,000 USD through its self-imposed carbon tax which has been deployed across several accredited carbon offset programs.
- Victor is one of Europe's largest providers of on-demand jet charter, with access to more than 7,000 aircraft worldwide and is forecasted to fly an estimated 5,000 missions over the next twelve months. We are recognised as an industry leader, featuring in the Sunday Times Tech Track Top 100 UK Companies each year between in 2015 and 2019.
- In 2021, Victor will have flown a total of 4,000 flights, emitting 30,274 tonnes of carbon. As part of our Build Back Better framework, 60,548 tonnes of carbon were offset, protecting 31,112 Ha of forest. Our certified projects are nature-based and Gold Standard or Voluntary Carbon Standard accredited and run in partnership with Vertis and South Pole.

Executive Summary

- Victor welcomes the UK Government's ambitions to ensure all domestic flights are emissions-free by 2040, and international aviation goal to reach Net Zero by 2050. However, we also recognise there is a role for private industry, specifically the business aviation sector to work in partnership with Government, to set an example to commercial aviation to help meet these targets.
- The aviation industry's trade associations, manufacturers, fuel companies and governing bodies have worked together to agree an ambition to reach Net Zero by 2050. However, we acknowledge that this ambition, and the targets set to realise it, come from within the industry. Those who have a vested interest to protect their position in the aviation supply chain have limited the ambition of what is being proposed and we fear the industry will not achieve Net Zero by 2050 as a result.
- Now is time for private industry, and in particular leaders in aviation that are committed to a Net Zero future and who are willing to challenge their industry, to help provide the necessary insights and drive to agree and deliver new goals to improve the likelihood of achieving Net Zero. Through industry leaders working in partnership to achieve a common goal, Victor believes the sector's Net Zero ambitions can be realised at a faster pace than currently expected, and with a necessary degree of transparency and scrutiny that is currently missing.
- Currently, business aviation accounts for around 2% of aviation's global carbon dioxide emissions and approximately 0.04% of all global man-made carbon emissions. Business aviation's clientele is made up of just 0.0001% of the world's population, the world's wealthiest individuals. This unique ultrahigh net worth customer segment affords the UK Government an unparalleled opportunity to engage with this highly influential group and encourage them to step up and openly tackle their own, and hopefully in turn their companies carbon footprint.
- Business aviation transcends borders, as do carbon emissions, and the sector is in a unique position. Its ultrahigh net worth consumers can easily afford to mitigate the carbon emissions associated with their air travel, meaning the business aviation industry is less likely to push back when the cost of mitigating carbon emissions can be defrayed to those that can afford not just to carbon offset but in addition the much higher cost of switching to SAF.
- We are calling for carbon emissions labelling on every airline ticket and private charter quotation. As part of this obligation, we believe operators and charter brokers must fully disclose the total fuel burn, the fuel efficiency for each aircraft and total carbon footprint for every flight flown. For commercial airliners this should be disclosed on a seat-by-seat basis, to encourage customer engagement and participation. For transparency, which is critical to consumer and wider understanding, we believe this data must be audited and reporting should include all carbon mitigating actions undertaken.
- A Carbon Emissions Register would ensure scrutiny of aviation companies' activities and provide against possible 'greenwashing'; it would force organisations and consumers to take responsibility for their environmental impact and build trust with the public who must come to recognise that the freedom to choose how they make certain lifestyle choices will come with a cost that they must eventually bear. Simply put, if there is no way of tracking, measuring, and reporting on the efforts required to achieve this industry goal, then we have no way of measuring our efforts and overall effectiveness.

- Key to the successful delivery of a Carbon Emissions Register will be:
 1. Clear labelling of emissions
 2. A clear plan to mitigate those emissions
 3. Proof of action taken
 4. A UK/EU-wide mandate, and
 5. Expansion across other jurisdictions

Victor's commitment to sustainability and the environment

- While Victor provides easy and efficient on-demand private travel, we recognise that our activity has an impact on the environment in which we operate. We want consumers to continue to have freedom of choice in how and when they travel. However, passengers should be empowered and actively encouraged to take responsibility for, and understand the impact of, their travel on the environment. Victor is working to ensure the sustainability of our own operations, as well as our industry more broadly. Since 2019 we have maintained a double Net Zero corporate footprint.
- The UK Government has used COP26 to launch a global aviation coalition to rally countries behind a long-term target to reduce global emissions from international flights and achieving Net Zero by 2050. We fully endorse this but recognise that governments around the world cannot drive this change alone. Victor acknowledges the significant role the aviation industry can and must play.
- We are ambitious about reducing emissions from business travel and the role that Sustainable Aviation Fuels will play. While we can only move as fast as supply will let us, we want to see as many customers as possible flying with a minimum blend of 50:50 SAF as soon as possible. The cost, availability, and distribution of SAF is still in its infancy. It is hampered by existing distribution agreements and import licences for traditional fossil fuel. Its availability at airport locations is governed by such agreements and, most importantly, its availability and uptake are a direct reflection of consumer demand.
- We recognise the uptake of SAF comes with a significant increase in the cost of air travel. For business aviation, we have calculated this to increase the overall cost between 16% and 20%. Clearly the business and commercial aviation industry cannot bear this cost on its own without Government subsidies and incentives. However, as business jets are used by the wealthiest segment in our society, many of whom are conscious of their public reputation, we believe this customer segment to be the most able to bear the cost of upgrading to SAF and will, in turn, provide the necessary catalyst to drive up the adoption of SAF.
- We believe an aviation emissions register detailing all private and commercial flights and their mitigating actions, which includes the reporting of flights flown with at least a 50% blend of SAF, will be a strong motivator for such high-profile individuals to volunteer to pay the premium to fly with SAF. A European Carbon Emissions Register will help Governments hold the aviation industry to account, track progress and commit to measurable targets.
- To that end, we are calling on the Government to take a lead and urge the public disclosure of all carbon emissions associated with every private jet flight in Europe, before mandating this requirement. This would see each industry participant having to declaring its total emissions per flight through a central registry and in turn throw the spotlight on the mitigating actions taken.

New and developing technologies

- The development of new technologies is critical to the UK reaching its ambitious Net Zero targets. This is true, too, for the aviation sector. For short-term flights, hydrogen and electric aircraft will certainly achieve certification within the next 5-10 years; however, it is not presently a viable solution at scale for longer distance flights where SAF is a more viable option to mitigate emissions.
- Contrail avoidance can have a significant impact on the overall effect of aircraft emissions on global warming, and the inclusion of such technologies highlighting which flights have adopted such mitigating flight paths, will demonstrate such technologies can be deployed to help restrict the rise in average global temperatures to 1.5 degrees.
- From November 2021, Victor is adding SAF as an upgrade option, where available, to reduce environmental impact of travel. SAF can reduce the lifecycle of carbon emissions by up to 80% when compared to traditional jet fuel. Victor's customers can afford the premium price which is currently attached to the use of SAF; however, if these fuels are to become a viable alternative for the aviation industry more broadly, further support and government investment will be necessary. As such, we call on the Government to work in partnership with UK industry to promote the development and use of SAF in aviation.
- It is also important to recognise that global partners and discussion will be crucial to ensuring the Net Zero target is reached for global aviation, with the European Commission having revealed that SAF currently accounts for only 0.05% of jet fuel use in the EU. They have suggested that without further policy intervention, this could increase to less than 3% by 2050, far short of the target necessary to hit Net Zero.

Increased disclosure of industry emissions

- Victor supports the disclosure of total fuel burn and emissions by all private and commercial aircraft on every ticket and charter. This will allow effective comparisons between more efficient aircraft. Such disclosure is crucial to driving change, allowing action to be taken to mitigate the emissions on a flight-by-flight basis. Without measuring and reporting the emissions contributions of individual companies, as well as the industry more broadly, the size of the problem cannot be accurately assessed or mitigated.
- Victor is committed to setting an example to the wider industry and to fully disclose fuel burn, fuel efficiency and total carbon emissions in every quote. Doing this means the consumer is explicitly informed of the most fuel-efficient option, allowing them to take responsibility for their environmental impact. At an industry level, such action would allow clear investigation of companies' emissions and mitigations.
- The business aviation sector is well provided for by a number of trade and governing bodies and we recognise that all have a vested interest in ensuring they do not become solely burdened with the cost of tackling aviation emissions. However, we also recognise this has impaired both their ambition and willingness to prescribe solutions that could possibly transition the industry to Net Zero by 2030. The work of industry can be strengthened by a legislative mandate that ensures verifiable proof of either certified offsets and or gallons of SAF purchased for each flight to include the absolute percentage of blend to substantiate the claim that CO₂ emissions have

been offset by sufficient use of SAF. Such evidence is necessary to prevent 'greenwashing' of organisations' environmental claims.

- A recent report from PwC has urged further scrutiny of companies' sustainability declarations. This reflects Victor's own concerns regarding accurate measurement of emissions, and we welcome calls for a global regulatory framework for verifying statistical accuracy of emissions statements. We believe this global framework should be mandated by legislation with penalties for false reporting.
- The timelines must be set out clearly and well in advance to allow the industry to prepare. Victor supports the implementation of reforms before December 2023, giving industry sufficient time to put in place the necessary infrastructure to reach the Net Zero targets. Once implemented in European business aviation, this formula could be further applied to commercial aviation more broadly, with all inbound and departing European flights bound to conform. By delivering this, international support from other nation states for a similar platform of measures can be achieved.

A Carbon Emissions Register

- For the Government's Net Zero Aviation Strategy to effectively support the UK aviation industry in achieving Net Zero, Victor calls on the Government to implement a carbon emission register. This will help drive change in the aviation industry and empower consumers to take a more proactive, and informed, role in mitigating their emissions.
- We believe every private aviation company should publicly report its flight emissions before committing to a CO2 reduction strategy. This will give governments and data providers a global and localised view of the business aviation sector's progress towards Net Zero. Without open reporting and full transparency of the greenhouse gas emissions from every flight, there is no viable roadmap for aviation to realistically reach Net Zero in the timeframe currently laid out.
- In order to achieve the 2050 Net Zero emissions target, Government must work in partnership with businesses, such as Victor, that are willing to lead by example and take on this transition. To reach Net Zero, that partnership must include a focus on having ready access to data, the technologies and solutions which are available and practicable now and recognise the interconnected nature of the aviation industry.
- Victor founder and Chairman Clive Jackson is willing to lead a working party of environmental scientists, technologists, sustainable fuel providers and aviation professionals to initially develop a framework for the labelling and disclosure of emissions and thereafter secure independent private and public involvement to create and administer a global aviation carbon emission register.

For more information, please contact Hannah Sharratt, Head of PR and Communications

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