



Next steps 2025: Restoring public trust and industry engagement

Carbon emissions in the aviation sector

Authored by: Student Number 14012847

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Executive Summary

Since winning the general election on 04 July 2024 the Labour Government has announced two UK airport expansions, the development of Sustainable Aviation Fuels (SAF), launched a consultation into creating airspace modernisation and HM Treasury has launched a consultation on Reform of Air Passenger Duty for private jets.

Airport expansion to boost the UK's economy is based on overturning local authority planning processes with little regard to advice from the Government's own expert adviser, the Climate Change Committee.

The UK Government is silent on the European Commission holding to account airlines potentially engaging in Voluntary Carbon Offsetting (VCO) greenwashing who use, or will use, the UK's 50 regional airports.

This policy brief assesses next steps to restore trust and collaboration:

- Review the planning regime towards a UK-wide airport capacity management framework.
- Collaborate with the aviation industry to frame VCO regulations and anti-greenwashing mitigation.
- Pro-actively address behaviours of UK flying public.

Introduction

In 1960, 100 million passengers travelled by air. By 2019, the total annual world-wide passenger 'hypermobility' count was 4.56 billion EESI (2022).

Over the next 20 years, IATA estimates that world passengers will increase by 3.8% per year on average with over 4 billion additional passenger journeys in 2043 compared to 2023. Asia Pacific will contribute over 50% net increase in global passenger numbers by 2043. IATA (2024).

Research by Transport & Environment (T&E) indicates that some UK airlines are polluting more as emissions approach pre-pandemic levels. Nearly 940,000 flights departed from UK airports in 2023, producing 32 Mt of CO2 emissions. Compared to 2022, the number of flights increased by 16% and emissions rose by 23%. Transport & Environment (2024).

Government, industry and the flying public all have roles to play to uphold the 'Net-Zero Carbon Emissions by 2050' ambitions of IATA's 330 member airlines. IATA (2021).

Recommendations

- DfT develop a UK-wide capacity management framework with Welsh, Scottish and Northern Irish Governments and MHCLG.
- DfT, DESNZ, Climate Change Committee, Sustainable Aviation to work on measures by industry and Government on UK aviation emission levels to 2050.
- DfT, DfB&T to engage with aviation industry on VCO regulation. Watching brief EU greenwashing outcomes.
- CAA Consumer panel establish an inter-government/ industry taskforce to develop a carbon reductions communications platform with NGO and citizen stakeholders.

Towards a UK-wide capacity management framework

“Cannot believe any government would want to increase aviation – the carbon footprint of an expanded Stansted will be enormous – followed but that of the increased air traffic... I am speechless.” Marion

Hebblethwaite, *Airport World* (2024) 'UK government welcomes London Stansted's expansion plans', 14 October.

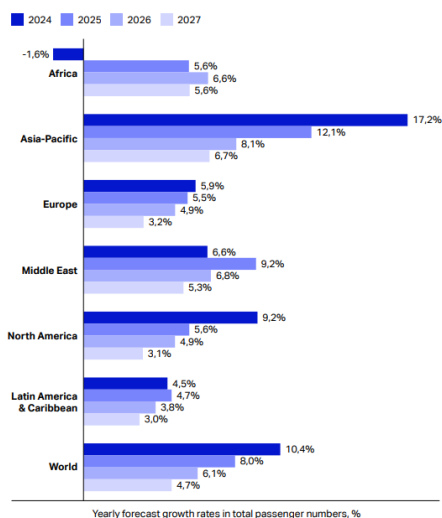
Expansion plans for London City Airport and the £1.1 billion investment in Stansted Airport follow fraught reversals of local authority planning decisions with resistance from community stakeholders. London City Airport Expansion was reported as showing 'false hope' in the Jet Zero Strategy. (Lo. 2024). 'Stansted Airport planning appeal: Inspectors overturn Uttlesford District Council's refusal for passenger growth', *Bishop's Stortford Independent*, 26 May. (Corr. S. 2021).

There is need for sustainable practices in airport terminal production (Xiong et al., 2024) and a need for a diligent review and examination of the UK planning regime and aviation emissions of regional airport development. (Bogojević, 2024).

... the legal duty under section 1 of the Climate Change Act 2008, which, as revised is set to achieve climate neutrality by 2050, falls only on the Secretary of State ...statutory climate law does not require local planning authorities to consider climate impacts when deciding on regional airport development applications. (Bogojević, 2024).

There are wide variations among UK airports in net zero reference, target years and proposed routes to decarbonisation. (Hemmings et al., 2023).

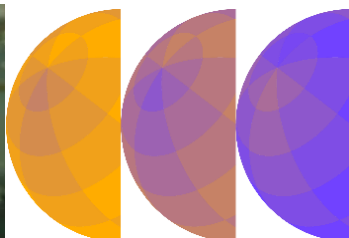
Chart 11: Regional and global yearly forecast growth rates in total passenger numbers, %



Source: Air Passenger Forecasts, February 2024 update

Fig 1: ATA (2024) Global Outlook for Air Transport - Deep Change Regional and global yearly forecast growth rates in total passenger numbers, %

Revisiting Climate Change Committee expertise



Climate
Change
Committee

“The UK is already substantially off track for 2030, and the Government must resist the temptation to take their foot off the accelerator.” Professor Piers Forster, Interim Chair of the Climate Change Committee (2024). *Future Emissions targets must not be loosened*, CCC 28 February.

UK governments fuel the ideological and fantasmatic narratives of ‘technological fixes’ and ‘sustainable aviation’ while defusing persistent opposition to airport expansion (Griggs and Howarth, 2023).

CCC staying on message

The Climate Change Committee (CCC) was established under the Climate Change Act 2008 and advises the UK and devolved

governments on reducing emission and adapting to the impacts of climate change.

- **2024** Climate Change Committee (2024) *Progress in reducing emissions 2024 Report to Parliament*. Table 4.2 p 87. Priority actions: Stop airport expansion without a UK wide capacity management framework. Available at: <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/>
- **2023** Climate Change Committee (2023) *Progress in reducing emissions 2023 Report to Parliament* p.267: No airport expansions should proceed until a UK-wide capacity management framework is in place to annually assess and, if required, control sector CO₂ emissions and non- CO₂ effects. Available at: <https://www.theccc.org.uk/wp-content/uploads/2023/06/Progress-in-reducing-UK-emissions-2023-Report-to-Parliament-1.pdf>

Revisiting House of Commons Environmental Audit Committee

The House of Commons Environment Audit Committee (2024) *Net zero and the UK aviation sector: Government Response to the Committee's Third Report* includes two recommendations that this Government may revisit that elicited the response: 'The Government notes this recommendation' :

- No. 3: The Government work with the Climate Change Committee and Sustainable Aviation on a comparative analysis of the models underpinning the projections for UK aircraft emissions. p3.
- No. 4: The Government sustain and enhance its engagement with the aviation industry on the delivery of operational to maintain the ambition to secure 2% year-on-year CO₂ emissions reductions from fuel and operational efficiencies. p.3.

Greenwashing – who to trust?



Image credit: stay-grounded.org

Greenwashing is an intrinsic element of the neoclassical economics playbook based on human exceptionalism to create economic growth while deflecting from, and capitalising upon, the climate crisis. (Gürçam, 2022), (Clapp and Dauvergne, 2011).

... as states pursue economic growth, environmental conditions—such as air and water quality—may deteriorate as governments and citizens give firms more scope to pursue short-term profits. (Clapp and Dauvergne, 2011).

However, UK based law firm Linklaters in assessing the implications of the 20 March 2024 district court of Amsterdam decision against Dutch flag carrier KLM notes a sea change in corporate boardrooms:

... litigation concerning greenwashing is assuming a more crucial role within the legal landscape. This trend underscores the growing recognition among corporate boardrooms of the importance of environmental authenticity and the potential risks associated with misleading eco-friendly claims. (Strik et al., 2024).

In April 2024 the European Commission announced it had written to 20 airlines identifying misleading green claims potentially prohibited under Articles 5, 6 and 7 of the Unfair Commercial Practices Directive inviting them to bring their practices in line with EU consumer law within 30 days. European Commission 2024, 'Commission and national consumer protection authorities starts action against 20 airlines for misleading greenwashing practices' (30 April).

The Commission did not name airlines. Reporting online, the European Consumer Organisation BEUC listed 17: Air Baltic, Air Dolomiti, Air France, Austrian, Brussels Airlines, Eurowings, Finnair, KLM, Lufthansa, Norwegian, Ryanair, SAS, SWISS, TAP, Volotea, Vueling, Wizz Air. (Surgenor, C., 2024).

UK law firm, Stevens & Bolton advise that while the UK is not subject to the EU Green Claims Directive, the UK Competition and Markets Authority has imposed a Green Claims Code. Both EU and UK airlines: 'should take steps to critically evaluate any environmental claims they may be making to ensure that they are not misleading'. (Broadhurst N., Barrow., G., 2024).

Following the November 2023 Virgin Atlantic SAF test flight, the Advertising Standards Authority (ASA) upheld a ruling that a Virgin Atlantic radio ad was in breach of BCAP Code rules and that the

unqualified claim “100% sustainable aviation fuel” was misleading. ASA (2024) Rulings 07 August.

A study has interrogated the authenticity, verifiability, and alignment of Voluntary Carbon Offset (VCO) claims made by 18 European airlines (Fabiana Peixoto de and Rosario, 2024). A key finding is:

insignificance and misalignment of the VCO programs, indicating that these initiatives are implemented without any substantial impact on the airlines’ mitigation efforts and are not integrated into their overall strategies. (Fabiana Peixoto de and Rosario, 2024) p 12.

M. Fabiana Peixoto de and M. Rosario

Journal of the Air Transport

Table 1
Measurement component.

Airline	Discloses Emissions	Discloses Methodology	Discloses Results	Greenwashing Engagement Level
Air France	✓	✗	✗	⚠
KLM	✓	Proprietary	✓	⚠
Transavia	✗	✗	✗	⚠
British Airways	✓	✗	✗	⚠
Iberia	✓	✗	✗	⚠
Vueling	✓	✗	✗	⚠
EasyJet	✓	Southpole	✗	⚠
Finnair	✓	✗	✗	⚠
Lufthansa	✓	Myclimate	✗	⚠
Air Dolomiti	✓	Myclimate	✗	⚠
Eurowings	✓	Myclimate	✗	⚠
Austrian Airlines	✓	✗	✗	⚠
Norwegian	✗	ICAO	✗	⚠
Ryanair	✓	✗	✗	⚠
SAS	✗	✗	✗	⚠
TAP	✓	ICAO	✗	⚠
Turkish Airlines	✓	✗	✗	⚠
Wizz Air	✓	IATA	✗	⚠

Legend: 🟢 Low 🟡 Medium 🔴 High

Fig 2: Fabiana Peixoto de, M., Rosario, M., 2024. Assessing the efficacy of EU greenwashing directive: A study of European airlines’ voluntary carbon offset programs. J. Air Transp. Res. Soc. 3, 100028. <https://doi.org/10.1016/j.iatrs.2024.100028> Page 8

As the Regulator, the UK Civil Aviation Authority (CAA) has set up a consultation to drive accuracy and accessibility in the environmental information consumers receive including standard reporting metrics. CAA (2024) *New proposals for environmental information to be available to consumers booking flights. (Consultation on draft principles for aviation consumer environmental information, 2024).*

"Providing consumers with accessible, transparent, and accurate environmental information is essential to making more informed travel choices." Tim Johnson, Director of Policy at the UK Civil Aviation



Review regulation of Voluntary Carbon Offsets (VCO) to create market stability and build consumer confidence

Researchers delved into the ways customers face deceptive and obfuscated communications about VCO. (Guix et al., 2022). Findings include airlines provide the moral license to fly by shifting responsibility by framing VCO as ‘the’ solution for customers to act green.

The VCO market is ‘currently plagued by failures that prevent it from reaching its potential’ (Battocletti et al., 2023).

Global law firm Norton Rose Fulbright advises: ‘CORSIA is no panacea’. It only applies to international flights, is an offset (not cap) and requires airlines to offset emissions over a high threshold baseline. Nor does CORSIA address emissions other than CO₂. (Norton Rose Fulbright, 2024).

Corporate appetite for the Carbon Offset Market is volatile. 'More Companies Ditch Junk Carbon Offsets but New Buyers Loom,' *Bloomberg* (2024) reports 24 October. The carbon offset market showed downturns in 2023 connected to renewable-energy projects with little climate benefit.

Consumer behaviour and understanding VCO

‘Personal norms, subjective norms, attitudes, and perceived behavioral (sic) control’ influence customers’ intentions to purchase VCO programs and in that order. (Park et al., 2024).

The tragedy-of-the-commons outlook creates a powerful sense of awaiting others to act first before individual sacrifices are regarded as worthwhile. (Stoll-Kleemann et al., 2001 p 115).

The CAA's Environmental Sustainability Strategy (2022) includes consumer protection. The CAA Environmental Sustainability Panel Meeting minutes of August 2024 record that the UK CAA recognises the Government wants to move forward quickly with sustainability and that consumer protection is key. (CAA 2024 Environmental Sustainability Panel Meeting Minutes 05 August).

Conclusion

The Government may consider: Revisiting recommendations of expert bodies to address a national framework for future airport developments; collaborating with industry on VCO regulation; concentrating on role of CAA consumer protection to facilitate environmental education outreach to millions of individual passengers.

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	Option 1 Establish a national framework for airport expansions	Option 2 Collaborate with aviation industry to review Voluntary Carbon Offsets (VCO) regulation on greenwashing	Option 3 Build on consumer protection/education role to CAA
Government budget	Inter-governmental with Treasury	Financial mechanism providing revenue streams	All funding from industry as part of CSR
Cost to the environment	Statutory climate law does not require local planning	Establishes regulatory standards, consistency across 13 UK airlines and potentially with	Increased public awareness with campaigns up to 2050

	authorities to consider climate impacts	IATA's 330 member airlines	
Costs to aviation	Good for forward planning	Heavy fines for airlines who do not comply	Help mend damaged brand values and reputations
Cost to communities	Potential for long running campaigns	Secondary polluters will pay but at what cost to far flung communities	Incentive schemes to be funded by aviation industry
Undesirable side effects	Further conflicts with NGOs/ communities UK's 50 airports	The markets remain volatile and concept is flawed	Makes no difference to human exceptionalism and entitlement to fly

Fig. 3 Potential outcomes