# UK EAC Inquiry: Airport expansion and climate and nature targets:

https://committees.parliament.uk/work/9061/airport-expansion-and-climate-and-nature-targets

## Safe Landing response

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### Introduction

1. Safe Landing is a global community of aviation workers and enthusiasts who care about the future of our industry and our planet. Our group includes pilots, cabin crew, engineers, air traffic controllers, airline, airport and factory workers from across the industry, with many based in the UK.

2. We want to live in a world where aviation flourishes in harmony with nature, and the beauty of flying can be enjoyed by all, for generations to come.

3. We understand, as well as anybody, that meeting our climate and nature targets is vital for the long-term future of aviation and the sustainability of our careers. It is clearly in our self-interest that government policy, industrial strategy and planning is well-informed, evidence-based and effective.

4. As stated by Heathrow (page 3): "*Climate is an existential threat to aviation as well as to us all personally and must be addressed*" [...] *"if the substantive changes that are needed haven't been made by 2030, the industry won't be on track for its 2050 goal.* ***This is the decade to make a difference****."*

5. On airport expansion specifically, we would like to highlight that in recent UK decisions the desire for economic growth and job creation has appeared to be balanced against, and used to counter, concerns about environmental impact. We see a strong contradiction here. If we can't effectively control our environmental impact, then projected benefits to our economy, industry and jobs can't be guaranteed and are at risk.

6. At the same time, there is a very positive story to be told. We firmly believe that if the UK Government takes decisive action to implement effective environmental policies related to airports, then this can supercharge aerospace innovation in the UK and increase aviation worker jobs. It could also improve connectivity, boost the economy, provide spill-over benefits to other sectors and reduce carbon, noise and air pollution from aviation - ensuring we meet our targets. This will require a strategy upgrade, and setting our industry on a new flight path.

## Expanding airport capacity within the Government's climate and environmental obligations

7. We are aware of the following targets and obligations relating to climate and the environment that apply to Government policy on expanding UK airports:
    - UK Climate Change Act (2008)
    - UK Airports National Policy Statement (ANPS) (2018)
    - UK Carbon Budgets, specifically Carbon Budgets (CB):
        - CB5 (2028-2032)
        - CB6 (2033-2037)
        - CB7 (2038-2042)
    - UK Jet Zero Strategy (2022)
    - UK Sustainable Aviation Fuel (SAF) Mandate (2024)
    - UK and EU Emissions Trading Schemes (ETS)
    - Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

8. Including international aviation emissions within the UK's Carbon Budgets is vital, as we currently lack a policy mechanism to effectively control aviation CO2 emissions.

9. Total cumulative emissions are all that matters to the environment, yet a carbon budget for UK aviation has not been set. This means that there is no quantified target available to assess the projected emissions from combined UK airport expansion plans against.

10. It also means that sub-budgets for individual airports are not available to assess the projected emissions from any individual airport expansion plans against. Without this, how can anybody make a clear decision about whether the plans meet environmental targets?

11. The **UK ANPS** has been referred to during airport expansion inquiries and decisions related to Stansted, Bristol, London City, Gatwick and Luton Airport expansion. All of these decisions have assessed projected airport emissions individually, rather than looking at the total combined projected emissions from all UK airports.

12. The **UK Jet Zero Strategy** is an exercise in scenario planning, but it ignores carbon budgets and only seeks to achieve "Net Zero" in 2050. It neglects airport or air traffic capacity constraints and assumes unrealistically low carbon prices. This leads to unrealistically high levels of air traffic growth in all of the scenarios. The strategy relies on technology (aircraft efficiency, alternative fuels, and negative emissions technologies) to deliver decarbonisation. However, it doesn't enact any policies to actually deliver the results shown in the scenarios.
    - Our response to the UK Jet Zero consultation: https://safe-landing.org/uk-jet-zero

- Our position on industry growth: https://safe-landing.org/industry-growth-position

13. The **UK SAF Mandate** sets targets for alternative jet fuel use, but cannot control aviation CO2 emissions. For example: even if the target of 10% alternative jet fuel by 2030 is met, this does not control how much conventional (fossil) jet fuel is used. Therefore, if airport expansion and air traffic growth inevitably leads to total fuel use increasing: total fossil jet fuel use and CO2 emissions may still increase even as their share of the fuel mix reduces to 90%. This is before accounting for the emissions associated with the alternative jet fuel itself, which may only reduce emissions by 40% relative to fossil jet fuel to qualify under the mandate. It may even increase emissions relative to fossil jet fuel if "HEFA" (produced from waste oil or fat) is used in large quantities and causes increased demand on palm and soy oil supply which will drive deforestation and land use change emissions.
    - Note: there are serious limitations to sustainably scaling alternative jet fuels, these fuels currently only make up 0.3% of the global jet fuel supply and our industry leaders say the SAF Mandate targets are likely to be missed.
    - Our response to UK SAF Mandate consultation: https://safe-landing.org/wp-content/uploads/2023/06/Safe-Landing-2nd-UK-SAF-Mandate-Consultation-Response.pdf
    - Our response to the UK SAF Mandate: https://safe-landing.org/uk-saf-mandate-response
    - Our position on "SAF": https://safe-landing.org/saf-position

14. The **UK and EU ETS** are **'**cap and trade' schemes but can't effectively control UK aviation emissions. Firstly, these systems include many other price sensitive sectors such as industry and energy, therefore reducing the cap and increasing the price of carbon credits to control aviation emissions could lead to higher cost of living for the general public, even those who do not fly. Secondly, the systems do not extend to flights to/from non-European destinations which cause the majority of UK aviation emissions. Therefore, airlines are able to fly outside of Europe to avoid increasing ETS charges which could lead to increasing UK aviation emissions due to increasing average flight distances.

15. The **CORSIA** scheme covers international flights to/from non-European destinations. However, it isn't a 'cap and trade' scheme, doesn't limit emissions, doesn't price most emissions and features carbon pricing levels which are too low to significantly impact emissions growth. Therefore, it can't effectively control UK aviation emissions either.
    - Note: CORSIA relies on carbon offsets for 'carbon neutral growth'. CEOs of some of our largest airlines have stated that the majority of carbon offsets "are fraud" and "are not scalable" because "there's just not enough room on the planet."
    - Our position on carbon offsets: https://safe-landing.org/carbon-offsets

16. Including international aviation emissions within the UK's Carbon Budgets, which the UK is legally-bound to deliver, would finally provide an emissions reduction target. By setting a specific carbon budget for UK aviation, then dividing and allocating carbon

budgets to individual UK airports - the UK could easily and effectively control aviation emissions by controlling jet fuel sales at each airport. This policy would also:

- Answer the question: "*can airport expansion be delivered within environmental limits*". If an airport believes it can expand and deliver return on investment within the jet fuel / carbon budget allocated, they can do so.
- Provide an increased market incentive for the development of alternative jet fuels and zero/low-carbon flight such as electric, hybrid and hydrogen powered aircraft. This would accelerate innovation, deliver economic growth within environmental limits and also reduce air and noise pollution for communities living under flight paths: https://safe-landing.org/luton-airport-expansion-apr-2025

17. Carbon Budget 6 (CB6) from 2033-2037 requires a 77% reduction on 1990 levels and an approximate 50% reduction vs. the current CB4 (2023-2027) levels. The UK Climate Change Committee (CCC) have advised that the UK is off track and that only a third of the emissions reductions required to achieve the country's 2030 target are currently covered by credible plans.

18. The UK CCC recently advised that by 2040, aviation will be the UK's highest-emitting sector. Therefore, an increase in UK aviation emissions induced by increased UK airport expansion is likely to significantly impact the UK Government's ability to deliver the reductions required.

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## Scope for development within current climate and environmental obligations

19. The projections made by the UK Department for Transport in the Jet Zero Strategy model a 70% increase in UK terminal passengers by 2050. This assumes airport expansion plans go ahead while ignoring the existence of carbon budgets.

20. Alternative analysis performed by Chatham House and commissioned by Possible, with our consultancy - modelled a requirement for UK air transport to decrease by about a third by 2030 in order to meet carbon budgets and outlines how this could be achieved without impacting most UK citizens.

21. The Jet Zero Strategy shows UK aviation emissions essentially remaining constant until 2030 and reduces to less than half by 2050. This would completely blow any fair share of the global carbon budget long before 2050. ICCT analysis shows the carbon budget for international aviation being blown during the mid-2030s and the carbon budget for 1.5°C being blown with the existing aircraft fleet only and no fleet growth.

22. Even the 2050 outcomes within the Jet Zero Strategy rely on very optimistic technology (including fuel and negative emissions) assumptions and maintaining a low effective carbon price for aviation emissions.

23. It's worth noting that the carbon prices used, particularly for international aviation emissions, do not represent current reality - as the CORSIA scheme is effective until 2035 and there has been no pricing policy agreed for after this point.

24. It's also worth noting that the optimistic technology assumptions are very unlikely to be realised without a higher near-term carbon price on aviation emissions. This essentially guarantees failure as the very policy mechanisms required to deliver the emissions reductions do not exist.

25. For example, with aircraft, airport and airline efficiency improvements: an optimistic value of 2% fuel efficiency per year is assumed, but this exceeds historic rates of aviation efficiency improvements (1-1.5% per year). We also know that further efficiency improvements are becoming more difficult to achieve as no new aircraft model introductions are planned over the next decade and we are into a scenario of marginal gains with aircraft improvements (source, page 71). The only way to push the major manufacturers into radical aircraft concepts that would achieve the 2% per year assumption is to enact a policy plan of higher carbon pricing or carbon budgets that would provide a clear incentive to go all out for efficiency improvements - but as these currently don't exist, they aren't taking the jump.

26. Another example is "carbon removals" or "negative emissions" technologies. The Jet Zero strategy is highly reliant on these technologies being proven and scaling, yet there is no existing policy mechanism in place to price aviation emissions in order to fund this. No other sector is so reliant or has the financial means to fund such projects - so without aviation funding it, the technology won't be developed or scaled to the levels required.
    - Our position on Negative Emissions Technologies: https://safe-landing.org/nets-position

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## Review of the Airports National Policy Statement

27. As mentioned above, recent airport planning inquiries to date have been unable to assess the individual impact of a specific airport expansion or the cumulative impact of UK-wide airport expansions vs. an airport-specific carbon budget or a UK-wide aviation carbon budget, as these do not exist.

28. As such, our main recommendation would be for the creation of a UK aviation carbon budget, and for this to be subdivided (based on political choices on levelling-up and access to air travel) into airport-specific carbon budgets which can then be used to assess airports on an individual basis to ensure that the combined, cumulative emissions from all airports will not exceed the national UK-wide budget.

29. It's worth noting that such a budget would not necessarily prevent airport expansion or air traffic growth, as this could then be achieved if aviation companies are able to scale the technologies and fuels as predicted.

30. Before an airport expansion is approved, the following conditions could be set:
    - It must stick to an agreed carbon budget
    - It must only use the latest generation aircraft with the highest fuel efficiency and lowest noise ratings.
    - It must implement a gold standard of operations to reduce air pollution.
    - It must meet a certain percentage of flights via zero-carbon aircraft.

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**Ensuring continued compliance with climate and environment obligations**

31. The following arrangements could be made to keep airports and aviation policy under review to ensure that climate and environment obligations continue to be met:
    - Every year review and report:
        - UK aviation emissions
        - "SAF" scale-up and the effectiveness of "SAF" in reducing the overall carbon intensity of aviation.
    - Every three years: review the UK aviation industry / Jet Zero strategy
        - Utilise Aviation Workers' Assemblies to provide democratic worker expertise and insight into policy recommendations.

32. The following policy safeguards could be offered by Ministers to ensure that the climate and environmental impacts from domestic and international aviation continue to be mitigated in a way consistent with these obligations:
    - **Carbon Budget for UK Aviation**: sub-divided to individual UK airports.
    - **Aviation-specific ETS**: separate aviation emissions from other sectors, and apply a different carbon price for flights vs. the ETS price for other sectors. This would allow improved price control over aviation without impacting other sectors.
    - **Carbon price for non-ETS flights**: covering the portion of emissions under CORSIA which are not currently priced by the CORSIA scheme.
    - Upgrade **UK Air Passenger Duty (APD)** to improve control of CO2 emissions by increasing the number of distance bands, increasing the rate for premium seats and private jet flights and increasing the rate for less fuel efficient aircraft.
    - Regulate **'frequent flyer programmes' / 'air miles schemes'**: e.g. apply a specific tax to the revenue generated from these programmes / schemes.
    - **Frequent Flyer Levy**:
        - https://safe-landing.org/ffl-europe
        - https://safe-landing.org/fly-less-frequently-less-far
    - **Zero Emissions Flight (ZEF) mandate** for new airport runways/terminals:
        - We have written about this recently related to Luton Airport: https://safe-landing.org/luton-airport-expansion-apr-2025
        - If a second runway is opened at Gatwick, we think this should be for zero-carbon aircraft only: https://safe-landing.org/gatwick-expansion-feb-2025

    - As these aircraft will initially have very different range and payload (passengers/cargo) compared to conventional aircraft, they will require a fundamentally different air transport network and airport runway, terminal, gate and recharging or refuelling infrastructure. As such, we see a key role for regional and private jet airports to be the initial sites for early “ZEF” operations. For instance: London City Airport, Biggin Hill, Oxford and Farnborough Airport around London: https://safe-landing.org/farnborough-airport-expansion-consultation
- **Contrail avoidance**: urgent policy action to mitigate contrail warming: https://safe-landing.org/contrail-avoidance-study

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