

By email: charleslloyd2015@hotmail.com

AirportWatch
Aviation Communities Forum
FlightFree UK
Gatwick Area Conservation Campaign
Heathrow Association for the Control of Air Noise
Luton and District Association for the Control of Aircraft Noise
No 3rd Runway Coalition
Stop Stansted Expansion

The Rt Hon Boris Johnson MP
Prime Minister
10 Downing Street
London
SW1A 2AA

19 November 2020

Dear Prime Minister

Regulating aviation decarbonisation to deliver a green economic recovery

We are writing in response to the recent letter to you from UK aviation industry leaders, which asks the Government to co-finance the sector's decarbonisation.

We are pleased the industry is beginning to acknowledge that it must address its climate change effects and other adverse environmental impacts. Its track record to date is dismal. UK aviation's CO₂ emissions grew by nearly 16% between 2010 and 2018 (and by 124% since 1990) and reached a new record high in 2019. The Climate Change Committee project that aviation will account for 35% of the UK's residual emissions by 2050, placing a restrictive burden on other areas of the productive economy, perhaps most particularly upon regions of the UK requiring further development.

Encouraged by the absence of effective regulation of its adverse environmental impacts, aviation has adopted a "words not actions" strategy, periodically announcing, then missing, a series of aspirational environmental targets. Instead of yet more words, the industry should now start taking decisive and long-overdue action.

Regrettably, however, its willingness to do so appears to be conditional on the taxpayer bearing the cost of the transition it needs to make. That should not happen: there is no economic or social case for public investment in aviation's decarbonisation.

UK aviation overwhelmingly provides leisure flights to a small and relatively wealthy sector of society: government data shows that 80% of UK passengers travel for leisure purposes and that 15% of people take 70% of flights. The industry already benefits from extensive public funding and tax advantages. Requiring the general taxpayer to cross subsidise further the low-margin high-volume business model the industry has chosen and the lifestyle choices of a small minority of the population would be wrong in principle. It would also perpetuate the current moral hazard in which the industry pollutes with impunity but expects others to bear the consequences and clean up after it.

Instead the Government's role should be to regulate the industry's emissions and other adverse environmental and health impacts properly, by setting and enforcing challenging targets and defined timescales.

The current regulatory vacuum, including the lack of any legal requirement on airlines to reduce emissions (in contrast to the requirements imposed by the Climate Change Act on other sectors), creates uncertainty that airlines will be willing to pay the premium that low carbon technologies and fuels will incur and is holding back the development of those markets. By contrast, effective regulation that obliges the industry to decarbonise would incentivise the market to develop, and the industry to adopt, low carbon solutions without the need for public funds. Reforming regulation of the industry's environmental impacts should therefore be at the top of the government's aviation action list.

Investment to decarbonise aviation and reduce its other adverse impacts is essential, but the costs and risks of that investment must be borne fully by the polluter - the industry and its customers - not by the taxpayer.

Yours sincerely,

Sarah Clayton, AirportWatch
Charles Lloyd, Aviation Communities Forum
Anna Hughes, FlightFree UK
Peter Barclay, Gatwick Area Conservation Campaign
John Stewart, Heathrow Association for the Control of Air Noise
Andrew Lambourne, Luton and District Association for the Control of Aircraft Noise
Paul McGuinness, No 3rd Runway Coalition
Martin Peachey, Stop Stansted Expansion

cc:

The Rt Hon Grant Shapps MP, Secretary of State for Transport
Robert Courts MP, Parliamentary Under Secretary of State
Huw Merriman, Chair, Transport Committee
Chris Stark, Chief Executive, Climate Change Committee
Karen Dee, Chief Executive, Airport Operators Association
Tim Alderslade, Chief Executive, Airlines UK
Dr Andy Jefferson, Programme Director, Sustainable Aviation