

Airports Commission's Recommendations Inconsistent with Climate Target

1. In Dec 2009 the Committee on Climate Change (CCC) recommended to government that there should be a limit on **UK aviation emissions by 2050 of 37.5mt** (million tonnes or mega tonnes) pa CO₂.ⁱ The CCC considered this to be the maximum level of aviation emissions that could be allowable given feasible emissions reductions in other sectors. They assume that other sectors could cut emissions by 85% - which they describe as “at the limits of what is feasible”. In July 2013 similar advice was given to the Airports Commission (AC).ⁱⁱ

2. In Jan 2013 DfT published its latest passenger and CO₂ forecasts.ⁱⁱⁱ The estimate of CO₂ at 2050 was 47.0mt, well above the target of 37.5. This was for a ‘constrained’ scenario, ie no new runways in the UK.

3. At the time of the Airports Commission's interim report, in Dec 2013, the AC produced revised forecasts of demand.^{iv} They were 4 sets of national passenger forecasts – unconstrained / constrained and carbon traded / carbon capped. ‘Unconstrained’ forecasts assume there will be no constraints on runway capacity anywhere; ‘constrained’ forecasts assume no new runway capacity. The forecasts were considerably lower than the DfT's.

4. ‘Carbon traded’ assumes carbon permits are traded on a carbon market. The carbon traded forecasts led to CO₂ emissions that were above the 37.5 mtarget. ‘Carbon capped’ forecasts were therefore produced which showed how much demand would need to reduce in order to meet the carbon cap. (The method was to progressively increase the assumed price of carbon and build it into the price of tickets, thereby reducing demand.) Without restrictions on runway capacity, the decrease in demand is 19%.^v Detailed carbon forecasts were not published, but figures for unconstrained and constrained passenger demand of 42.4 and 38.5 mtCO₂ pa at 2050 are buried in the interim report appendix.^{vi}

5. Even with no new runways, CO₂ emissions the AC's forecasts for 2050 are greater than the 37.5 mt target. The AC nonetheless recommended a new runway in the SE. It can thus be seen clearly that the **Commission ignored the CO₂ target** when making its recommendation.

6. In the AC's consultation documents, November 2014, on the 3 shortlisted runway options,^{vii} 5 demand scenarios were analysed. In this case, the demand figures are not ‘constrained’ (no new runways) as previously, but assume there will be one new runway at Gatwick or Heathrow. Whichever scenario is taken and irrespective of whether the new runway is at Gatwick or Heathrow, CO₂ emissions are greater than the target.^{viii} The report says “all the carbon-traded expansion scenarios entail increases in carbon emissions from aviation above 37.5 MtCO₂e.”^{ix}

7. It can be seen that in each of the scenarios the carbon target is exceeded. In other words, unless there are new measures that they do not discuss, let alone recommend, the AC's recommendations **would not be consistent with the CO₂ target for UK aviation**.

8. There are a number of possible measures that could be deployed to bring emissions within the target:

- Restrict growth at regional airports
- Not use the full capacity of the new runway
- Increase the price of tickets to reduce demand and hence emissions.
- Introduce mandatory fuel efficiency measures

Each of these would demand a big policy shift and none are recommended by the AC. They are all significant enough to throw into the severest doubt the AC's recommendation to build a new runway.

9. The above analysis shows clearly that the **ACs recommendation for a new runway at either Gatwick or Heathrow is inconsistent with the UK's climate target unless there is major change in aviation policy.** To claim that the recommendation for a new runway is consistent with the UK climate targets, without specifying the major policy shifts that would be needed, is fundamentally and deeply misleading.

10. In addition to recommending the 37.5mt limit, CCC also recommended that a revised economic appraisal should be carried out in which the price of carbon is increased such that emissions are reduced to the 37.5mt limit. The AC claims "technical difficulties" have prevented this being done earlier, and says it will do some further work. But the results will not be disclosed until after the AC makes its final recommendation, thereby preventing any public scrutiny. The technical difficulty is that the carbon cost will "dominate" (AC's word) the economic assessment. **The net economic benefit would become negative, fatally undermining the AC's runway recommendation.**

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For AirportWatch
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AirportWatch is an umbrella movement uniting the national environmental organisations, airport community groups, and individuals opposed to unsustainable aviation expansion, and its damaging environmental effects, including climate change and noise. www.airportwatch.org.uk

ⁱCCC sets out options to meet the UK's aviation emissions target, 8 December 2009.

<http://www.theccc.org.uk/pressreleases/ccc-sets-out-options-to-meet-the-uks-aviation-emissions-target-8-december-2009/>

ⁱⁱ Lord Deben letter to Sir Howard Davies, 3.7.2013. http://www.theccc.org.uk/wp-content/uploads/2013/07/CCC_letter_aviation_commission.pdf

ⁱⁱⁱ DfT Aviation Forecasts. Annexe G2, page 173.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/223839/aviation-forecasts.pdf

^{iv}<https://www.gov.uk/government/publications/airports-commission-airport-level-passenger-forecasts-2011-to-2050> Some of the constrained, but not the unconstrained forecasts were also included in the Interim report 'Appendix 3: technical appendix', Section 6, Tables 6.1 to 6.3.

^v From the above documents, the forecasts passenger demand at 2050 is 448 million passengers pa (mppa) unconstrained and 377 mppa constrained. So constrained is 18% lower.

^{vi} Airports Commission Interim Report December 2013 Appendix 3: technical appendix, Section 5, Table 5.2.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/266670/airports-commission-interim-report-appendix-3.pdf

^{vii} Consultation Document: Gatwick Airport Second Runway, Heathrow Airport Extended Northern Runway, Heathrow Airport North West Runway, Nov 2014. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/381912/AC01_tagged_amend_2_5_11.pdf

^{viii} Ibid, figs 6.7 to 6.9, p177-179.

^{ix} In 'Heathrow Airport North West Runway: Business Case and Sustainability Assessment' Para 1.14, p15 and similarly for the other two shortlist assessments.