

2040 zero emissions airport target

Personal Details

Q1. Your (used for contact purposes only):

name? Ed Winter

email? ed.winter66@gmail.com

Q2. Are you responding:

on behalf of an organisation?

Organisation details

Q4. Your organisation name is?

GACC (Gatwick Area Conservation Campaign)

Q5. Your organisation is:

another type of organisation?

Environmental Campaign Group

Defining airport operations

Q6. Do you agree or disagree with the proposed definition of airport operations for the target?

Disagree

Defining airport operations: further issues

Q9. What, if any, further views do you have on the proposed definition of airport operations for the target?

The definition only covers less than 5% of the total emissions caused by use of the airport. We believe that all of the emissions, including non CO2 impacts, in particular those caused by the flights facilitated by the airports should be measured and transparently reported.

Emissions scopes

Q10. Do you agree or disagree on the target being applied for the Kyoto gases as described in the GHG Protocol?

	Agree	Disagree	Don't know
Carbon dioxide (CO2)	X		
Methane (CH4)	X		
Nitrous oxide (N2O)	X		
Hydrofluorocarbons (HFCs)	X		

Q10. Do you agree or disagree on the target being applied for the Kyoto gases as described in the GHG Protocol?

	Agree	Disagree	Don't know
Perfluorocarbons (PFCs)	X		
Sulphur hexafluoride (SF6).	X		

Emission sources in scope of the target

Q11. Do you agree or disagree with the list of Scope 1 and 2 emissions sources for airport operations?

Disagree

Emission sources in scope of the target: disagree

Q12. Explain your response.

All emissions caused by

- landing and taking off of aircraft at the aerodrome, including those used for air traffic services
- manoeuvring, parking, refuelling, or servicing of aircraft between landing and take-off at the airport
- transport and processing of persons, baggage, and cargo between their arrival at the airport and their departure, including the passenger terminal,
- stationary sources of boilers, furnaces, burners, turbines, heaters, incinerators, engines, firefighting exercises, flares, generators and more
- mobile sources of vehicles (airside and landside) - trucks, employee buses, ground power units, construction vehicles and plant and more
- process emissions of onsite waste management, wastewater management
- other emissions of refrigerant losses, de-icing substances, leaks from plant particularly fire suppression CO2, fuel tanks and more
- energy indirect emissions of emissions from purchased electricity, heating, cooling and more should be included, and not just those "owned" by the Airport.

All operations by airlines, engineering, ground handling and freight companies etc. on an airport are licensed by the Airport who therefore has total "control" over these operations. It is entirely within the Airport's power to introduce compulsory emission reduction targets as a condition of these licences. For example the Airport could provide airside EV charging points and ban non electric vehicles from a particular date.

Q13. What should be:	
added to the list of Scope 1 and 2 emissions sources for airport operations?	All sources of emissions whether owned by the airport or not.
removed from the list of Scope 1 and 2 emissions sources for airport operations?	-

Emission sources in scope of the target

Q14. What, if any, further views do you have on the list of Scope 1 and 2 emissions sources for airport operations?
Any of the scope 3 sources that is "controlled" by GAL should be within Scope 1 or 2

Emissions sources in scope of the target

Q15. What are your views on our current approach to:
construction under this target? should be included
construction vehicles under this target? should be included

Q16. Do you agree or disagree with the list of Scope 3 emissions sources for airport operations (we ask you answer regardless of whether these sources are within scope for the target)?
Agree

Emissions sources in scope of the target: views

Q19. What, if any, further views do you have on the list of Scope 3 emissions sources for airport operations?
Any of the scope 3 sources that is "controlled" by GAL should be within Scope 1 or 2

Emissions sources in scope of the target

Q20. Do you agree or disagree, that a requirement should be included as part of the target for airport operators to report their Scope 3 emissions in line with ACI requirements at levels 4/4+?
Disagree

Emissions sources in scope of the target: explanation

Q21. Explain your response.

Airports should be required to measure and transparently report all emissions including flights and CO2 impacts caused by the operation and use of the airport.

Emissions sources in scope of the target

Q22. Do you agree or disagree that a requirement should be included as part of our target for airport operators, to ensure those emissions sources, not under operators direct control, are zero emission by 2040?

Agree

Requirements to be included as part of the target

Q23. Explain your response.

All emissions which are caused by the airport facility should be transparently reported.

Exemptions from the target

Q24. How should any potential exemptions from the target be dealt with?

Other:

Safety and a very low minimum threshold for other items

Explain your response.

Exemptions need to be very clearly defined to ensure that "loopholes " are not created

Entities subject to the target

Q25. Do you agree or disagree, that the target should be applied to other entities whose Scope 1 and 2 emissions fall under the definition of airport operations?

Agree

Entities subject to the target

Q27. Do you agree or disagree that the operational control approach should be used to apportion responsibility for airport operation emissions under the target?

Agree

Entities subject to the target agreement

Q28. Explain your response.

In general, all third parties operating on an airport will be licensed to do so by the Airport Operator. As such they will have control through the terms of the licence they provide to third parties. This is only valid if the Airport Operators are legally required to exercise their control over third parties in relation to emissions.

Q28. Explain your response.

Airports subject to the target

Q31. Do you agree or disagree that there should be a minimum threshold based on the size of the airport below which the target does not apply?

Disagree

Threshold on airport size

Q32. Explain your response.

If there was to be a minimum threshold it would need to be very low.

Airports subject to the target

Q33. Which metric should be used to determine an airport's size?

Air traffic movements

Types of airport business operations

Q34. Which types of airport business operations should the target apply to?

Other:

All, other than safety related operations, e.g. Air sea rescue and air ambulance

How to ensure the target is implemented

Q35. What policy option do you think is most appropriate for the implementation of the target?

Legislative requirement

Explain your response.

To ensure target will be met and legitimise any sanction for non-compliance

Q36. What are your views on a voluntary approach to implement the target?

Target would be unlikely to be met

Q38. Do you agree, or disagree, that there should be a penalty for non-compliance with the target?

Agree

Penalties for non-compliance

Q40. If there is a penalty for non-compliance, what should this look like?

Restrictions on Airport Operators Licence

How to ensure the target is implemented

Q41. What, if any, specific issues do you anticipate with the target only being applied to airports in England if similar targets are not applied by devolved administrations?

Unfair competitive advantage encouraging England airports to renege on achieving targets.

Barriers to implementation

Q42. What do you think are the main barriers in implementing the target?

Commercial viability

Investment in technological developments.

Q43. Do you have an approximation of the scale of investment required to achieve this target?

Don't know

Barriers to implementation

Q45. What financial government initiatives would help to achieve this target?

The costs should be borne by the consumers. The government should not be subsidising those causing emissions in any sector. .

Q46. What non-financial government initiatives would help to achieve this target?

Continued licence to operate

Opportunities for implementation

Q47. What, if any, opportunities do you think exist that could be exploited in the implementation of the target?

Zero emission technology is obvious

Opportunities for implementation

Q49. Are current government policies sufficient to encourage transition to these technologies?

No

Measuring and reporting of emissions

Q53. What ideas, if any, do you have for how a progress reporting requirement could operate?

The 2040 net zero target for airport operations, if introduced, must be accompanied by a requirement for transparent reporting of the emissions, associated with the flights from each airport, as suggested in the consultation. The reports should also include all non CO2 impacts which make up two thirds of the warming caused by aviation.

Q54. How frequently should progress towards the target be reported?

At least annually

Q56. Do you agree or disagree, that there should be a defined standard that should be followed by the entities covered by the target to allow for effective monitoring of progress towards the target?

Agree

Measuring and reporting of emissions: reasoning

Q57. Explain your response.

A defined standard for reporting allows for more transparent reporting.

Further comments

Q59. Is there anything else we have not considered that is relevant to this target?

In reporting any progress towards meeting the target, airports should make clear the limits of its scope and should avoid references to becoming a 'zero emission airport' or similar, instead reframing the target as "zero emission airport ground operations", or similar. Otherwise, this could have a highly misleading impression on customers who may not realise that the target refers to less than 5% of the total emissions associated with taking a flight and who therefore might be encouraged to fly more

Any other comments

Q60. Any other comments?

We reject the premise in the consultation that "...a zero-emissions airport target would .."provide a social licence for growth". How can this possibly be correct when the target only addresses less than 5% of the total airport emissions? No further growth should be allowed unless it is truly zero emission.