

## **DfT Consultation on 2040 Zero Emissions Airport Target**

**A response by The Chartered Institute of Logistics and Transport (UK)**

April 2023

- 1 The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission draws on contributions principally by the Aviation Policy Group.
- 2 Our response to this consultation begins from a basic principle that any target should be capable of being met by activities under the control of the airport. Control can be by direct operation, but also through leases, licences and other forms of legal agreement. Some activities can be influenced by the airport but not controlled, and only those where the influence is significant should be included in the target. We suggest that, in order to be measurable, enforceable and under the control of or significant influence of the airport, the airport land boundary should be the defining feature of the scope of the target. While there may be some airports where the land boundary may not be clear, a boundary can be shown on a map and therefore the activities which take place within it can be known.
- 3 Any airport emission target should not be considered in isolation. Many other sectors, locations and activities will have to have similar targets if the various decarbonisation policies are to be implemented. Double counting must be avoided.

**Question 1: Do you agree or disagree with the proposed definition of airport operations for the target? Explain your response.**

- 4 We agree with the definition, provided that the facilities are within the airport land boundary.

**Question 2: If you disagree with the proposed definition of airport operations, what do you think, if anything, should be added to the definition?**

**Question 3: If you disagree with the proposed definition of airport operations, what do you think, if anything, should be removed from the definition?**

**Question 4: What, if any, further views do you have on the proposed definition of airport operations for the target?**

- 5 No response to Q2, 3 and 4.

**Question 5: Do you agree or disagree on the target being applied for the Kyoto gases as described in the GHG Protocol? Please provide detail if you disagree.**

6 Agreed.

**Question 6: Do you agree or disagree with the list of Scope 1 and 2 emissions sources for airport operations? Explain your response.**

7 Agreed. Although we do not have technical expertise in some of these areas, it is possible that 'difficult to decarbonise' systems can be replaced by alternative processes.

**Question 7: If you disagree with the list of Scope 1 and 2 emissions sources for airport operations, what, if anything, should be added to the list?**

**Question 8: If you disagree with the list of Scope 1 and 2 emissions sources for airport operations, what, if anything, should be removed from the list?**

**Question 9: What, if any, further views do you have on the list of Scope 1 and 2 emissions sources for airport operations?**

8 No response to Q7, 8 and 9.

**Question 10: What are your views on our current approach to construction and construction vehicles under this target?**

9 Our view is that construction and maintenance operations should be included in the target. They are within the airport boundary and often take place at the same time as ongoing activity.

**Question 11: 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) Explain your response.**

10 We do not agree with the list of Scope 3 emissions, as explained in our answer o Q13.

**Question 12: If you disagree with the list of Scope 3 emissions sources for airport operations, what, if anything, should be added to the list?**

11 No suggested additions.

**Question 13: If you disagree with the list of Scope 3 emissions sources for airport operations, what, if anything, should be removed from the list?**

12 Emissions from aircraft in flight are in excess of 90% of the total emissions from aviation. The Jet Zero strategy sets out a pathway for total emissions to reach net zero by 2050. To include all these emissions in a target for zero in 2040 is completely unachievable and contradicts the Jet Zero strategy.

13 From the principle of including activities within the airport boundary, we suggest that aircraft approach, climb, cruise from origin to destination should be removed from the list. These emissions are way beyond the control of the airport. The airport may have a limited degree of influence of the type of aircraft operated through charges, but slots are allocated by an independent organisation following internationally accepted rules. However, from the principle

of considering emissions within the airport boundary, aircraft ground movements, including taxiing, take off and landing should be included.

- 14 Also from the airport boundary principle, travel to and from the airport by passengers and staff, off site waste disposal and emissions from power generated off site should not be included. While the airport may have some degree of control or influence for these activities, they will also be covered by targets for other sectors.

**Question 14: What, if any, further views do you have on the list of Scope 3 emissions sources for airport operations?**

- 15 On a point of detail, we agree that APUs should be included in the target but, in order to minimise that amount of time that APUs are run, airports should be mandated to provide Fixed Electrical Group Power.

**Question 15: 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 and 4+? Explain your response.**

- 14 We agree that reporting Scope 3 emissions should be a requirement even though some of the emissions (as noted in our answer to Q13 above) should not be included in the 2040 zero target.

**Question 16: 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? Explain your response.**

- 15 Disagree. By definition, if an emission source is not under an operator's control, it cannot ensure it is at any particular level. However, work is needed to establish how such emissions can be controlled as there is currently no way for an airport to effectively control them.

**Question 17: How should any potential exemptions from the target be dealt with? Explain your response.**

- 16 No particular views.

**Question 18: 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? Explain your response.**

**Question 19: Do you agree or disagree that the operational control approach should be used to apportion responsibility for airport operation emissions under the target? Explain your response and if you disagree, which alternative approach would you prefer?**

- 17 For Q18, in order to keep the target simple and therefore enforceable, we suggest that it should apply only to the airport operator. Therefore, for Q19, there is no need to apportion to target between different entities.

**Question 20: 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? Explain your response.**

**Question 21: Which metric should be used to determine an airport's size? Explain your response.**

**Question 22: Which types of airport business operations should the target apply to? Explain your response.**

- 18 All licenced airports should be subject to the target. The target should apply to the airport land owner for all activities within the airport boundary.

**Question 23: What policy option do you think is most appropriate for the implementation of the target? Explain your response.**

**Question 24: What are your views on a voluntary approach to implement the target?**

**Question 25: If there is a voluntary approach for this target, what should it look like, and how should it ensure the target remains robust and is delivered?**

**Question 26: Do you agree, or disagree, that there should be a penalty for non-compliance with the target? Explain your response.**

**Question 27: If there is a penalty for non-compliance, what should this look like?**

- 19 There should be a legislative requirement on all licenced airports, with the penalty for non-compliance being the revoking of the licence.

**Question 28: 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?**

**Question 29: What do you think are the main barriers in implementing the target? Explain your response.**

**Question 30: Do you have an approximation of the scale of investment required to achieve this target? If so, provide any details you have including references to data sources.**

**Question 31: What financial government initiatives would help to achieve this target?**

**Question 32: What non-financial government initiatives would help to achieve this target?**

**Question 33: What, if any, opportunities do you think exist that could be exploited in the implementation of the target?**

**Question 34: What technologies are important to achieve this target?**

**Question 35: Are current government policies sufficient to encourage transition to these technologies? Explain your response.**

**Question 36: How could the implementation of this target help to support the future shift of airports to integrate hydrogen?**

**Question 37: How, in your view, should airports look to develop export potential in regard to their transition to zero emission operations? Explain your response.**

**Question 38: What ideas, if any, do you have for how a progress reporting requirement could operate?**

**Question 39: How frequently should progress towards the target be reported?**

**Question 40: What are the metrics that you think progress should be measured against?**

**Question 41: 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? Explain your response.**

**Question 42: What are, if any, the specific issues you anticipate with regards to increased emissions reporting?**

- 20 No views.

Submitted by:  
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