OPEN LETTER TO THE AIRPORTS COMMISSION

Correspondence Address:
C/O Aviation Environment Federation
Broken Wharf House, 2 Broken Wharf
London EC4V 3DT

Sir Howard Davies
Airports Commission
6th Floor, Sanctuary Buildings
20 Great Smith Street
London SW1P 3BT

31st October 2013

Dear Sir Howard,

As environmental and aviation NGOs, we welcome your speech given on the 7th October, "*Emerging thinking: aviation capacity in the UK*", as it highlights that the Commission is "alive to the climate problem". Further, we strongly agree with you that aviation must develop within the framework of the Climate Change Act and the recommendations of the Committee on Climate Change (CCC) about how best to achieve our national 2050 target of an 80% cut in CO_2 on 1990 levels. However, we struggle to see how following the CCC's recommendations and achieving our national climate goal can be reconciled with the Commission's emerging view that additional capacity is required in the South East.

We consider that the Commission should explicitly recommend keeping aviation emissions at or below 2005 levels by 2050 (a maximum of 37.5 $MtCO_2$), in line with the 2009 CCC report[1]. This affords aviation a very generous target when compared to the deep cuts required of other sectors of our economy, some 85% below 1990 levels, to deliver the overall emissions reduction. As the DfT estimates that aviation emissions will be closer to 47 $MtCO_2$ by 2050, and the scale and timing of technological improvements or the use of alternative fuels remain open to question, there is little, if any, margin for error in achieving the CCC limits.

The uncertainty of meeting climate targets requires a cautious approach to future capacity provision to avoid locking the UK into infrastructure decisions that will jeopardise these targets. In effect, building new runways now will create higher costs for the whole economy as we approach 2050. To keep within the CCC framework the full use of any additional runway may have to be restricted, which means more risk for investors. In order to account

[1] We also wish to draw attention to the CCC's 2012 report which makes a planning assumption that aviation emissions should be kept at no more than 31 $MtCO_2e$ per annum through to 2027. The report is available at http://archive.theccc.org.uk/aws/IA&S/CCC_IAS_Core_ScopeOfBudgets_April2012.pdf

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for the cost-benefit of additional infrastructure to the whole economy, we request that you apply the Social Cost Benefit Analysis (SCBA) framework recommended in a report by CE Delft, *Economics of Airport Expansion*[2].

The CCC analysis concluded that stabilising aviation's emissions at 37.5MtCO_2 could translate to a maximum 60% growth in the number of passengers at UK airports. Yet there are a number of compelling arguments against your conclusion that the 60% growth figure supports the need for additional runway capacity:

1. **Such growth is achievable within existing runway capacity.** This is demonstrated in the analysis prepared by AEF and WWF[3].
2. **Any new infrastructure will require capping of capacity and use at other airports.** This will notably affect airports in the South East and the rest of the UK.
3. **Future climate targets will need to take account of aviation's non-CO_2 contribution to climate change.** The CCC cautioned that its 2009 report did not take non-CO_2 impacts into account and future targets will need to be amended. The overall climate impact of aviation greenhouse gas emissions is considered to be around double that of CO_2 alone, suggesting that far tougher targets will be required.
4. **Doubt surrounds the future of the EU ETS and the introduction of a global market-based measure through ICAO.** Carbon markets cannot be relied on to provide a safety net for the sector to meet the CCC's targets through net reductions.

We call on the Commission to demonstrate how its recommendations will avoid gambling on our future ability to meet the UK climate target. We also urge the Commission to retain a "no new runways" option in its deliberations as the best way of achieving the targets set in the UK Climate Change Act.

Unmitigated climate change poses huge risks to the global economy, human development, and the natural environment and the costs are potentially enormous. Failure to act now to constrain aviation emissions will present the UK with higher economic and environmental costs of climate change later on.

Yours sincerely,

Tim Johnson, Director,
Aviation Environment Federation

Stephen Joseph, Chief Executive Officer,
Campaign for Better Transport

Craig Bennett,
Director of Policy and Campaigns,
Friends of the Earth

Doug Parr, Policy Director,
Greenpeace UK

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[2] CE Delft (2013) The Economics of Airport Expansion. Available at: http://assets.wwf.org.uk/downloads/economics_of_airport_expansion_march_2013.pdf

[3] AEF and WWF (2011) Available UK airport capacity under a 2050 CO2 target for the aviation sector. Available at http://assets.wwf.org.uk/downloads/airport_capacity_report_july_2011.pdf

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Sue Armstrong-Brown,
Head of Conservation Policy,
RSPB

Neil Thorns, Chair,
Stop Climate Chaos Coalition

Hilary Allison, Policy Director,
Woodland Trust

Jean Leston, Transport Policy Manager,
Climate & Energy Team,
WWF-UK