Consultation response to the CAA's call for evidence on consumer environmental information

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Summary

This paper is Transport & Environment's (T&E) response to the questions posed by the Civil Aviation Authority's call for evidence on consumer environmental information. T&E is Europe's leading clean transport think tank and campaigning group. It was created over 30 years ago and now has staff in 6 countries, with 63 member organisations across 24 countries. It has had a UK office since 2019, working directly with partners and supporting policy-makers with evidence-based solutions to decarbonise UK transport. At the international level, T&E coordinates the International Coalition for Sustainable Aviation, which has observer status at the International Civil Aviation Organisation (ICAO). At the UK level, it is an active member of the Jet Zero Council's SAF Delivery and Commercialisation groups.

In 2019, carbon emissions from UK aviation were over 220% of 1990 levels. This is in direct contrast to overall emissions from the UK as a whole, which were 67% of 1990 levels. Furthermore, despite the pandemic it is widely anticipated that they will be back above 2019 levels soon. A lot of the reason for this lack of decarbonisation progress is the lack of environmental regulation on the industry. Providing consumers with the climate impact of their choices is a simple tool that is already used in other sectors.

The following high level points should be applied to any environmental consumer information:

- Consumers should be provided with environmental information at the earliest point possible in the research and booking process.
- Information should be displayed with the same prominence as the price
- Information should be standardised across all types of booking websites / outlets.
- Non-CO2 impacts should be accounted for.
- The same methodology should be used to calculate the climate impacts of flights, regardless of airline or booking platform.
- For domestic and European flights, the climate impact of taking the journey by car or train should also be displayed.
- The climate impact of flights should also be compared to the average annual emissions of a British person

Finally, whilst outside the scope of this consultation, consideration should be given to requiring airlines to provide information on the climate impact of flights in any promotional material, akin to how car manufacturers are required to.

Below are the answers to the specific questions posed in the consultation:

8. What are your views on existing examples of aviation consumer environmental information (for example those listed in Appendix A of CAP2395)?

[Previous research](#) suggests that 88% of people feel it's too hard to make sustainable choices, partly because of limited knowledge. 86% of people would like the Government and businesses to do more to help them make sustainable choices. The environmental information currently provided when purchasing flights simply isn't useful to consumers: no information is currently provided on the non-CO2 impacts from aviation, none of it is relatable and none of it compares to other activities a consumer may undertake. Useful information would provide consumers with a clear and unambiguous comparison of the flight in question with both other flights and other modes of transport. Additionally, environmental information should show what the impact of a flight is compared with the average annual climate change impact of a British person.

Crucially, consumer environmental information should not simply compare different flights and rate them on a traffic light basis. Green flights would suggest that the flight is 'good' for the environment. This is not true.

9. Please list/identify examples of existing schemes for the provision of aviation consumer environmental information beyond those listed in Appendix A of CAP2395.

No response provided.

10. What are the key requirements for the presentation of accurate consumer environmental information?

There are two other requirements. Firstly, that environmental information is provided for all types of flights, be they commercial tickets or hiring private jets. Secondly, that the information is standardised, from a trusted source.

11. What are the key requirements for the presentation of understandable consumer environmental information?

The main requirement is simply that any information provided should be clear and easy to understand. As mentioned, this should include comparisons to emissions to other modes of transport for flights within the UK and Europe. Furthermore, it should include information on the flight's potential share of an average person's annual emissions.

Importantly, information should not simply compare flights against other flights. This currently happens on skyscanner: green ticks are awarded for flights with below average emissions, even on flights where there is a direct train link between the airports involved. Green ticks imply that the flight is good environmentally. If anything, green ticks should be reserved for future zero emission flights involving electric or hydrogen fuel cell planes. Planes using sustainable aviation fuel should be treated the same as planes burning fossil kerosene. This is because SAF is chemically virtually identical to fossil kerosene, emitting the same amount of greenhouse gases as fossil kerosene when burnt.

This builds on a [previous Climate Change Committee recommendation](), which said that information should be "meaningful to consumers".

12. What are the key requirements for the presentation of standardised consumer environmental information?
All booking outlets, be they comparison websites or airline websites, should display the information in exactly the same standardised format. This ensures that consumers can compare flight emissions on a like-for-like basis, and also ensures that consumers get used to the standardised information (this is akin to [nutritional labelling]() on pre-packed foods).

13. What are the key requirements for the presentation of comparable consumer environmental information?
As previously mentioned, for flights within the UK or to Europe, comparisons should be made to surface transport. Furthermore, flight emissions should also be expressed in a percentage of an average Brit's annual emissions (eg "taking this flight equals 28% of the annual emissions of an average British person").

This is similar to two recommendations given in the [Net Zero Review](): 1) to create a carbon calculator to inform consumers of the carbon intensity of different choices, and 2) to pursue ecolabelling to help consumers make more informed purchasing decisions.

14. What are the key requirements for the presentation of accessible consumer environmental information?
No response provided.

15. What are the key requirements for the presentation of useful consumer environmental information?
Please see the answers given previously.

16. What consumer environmental information should be presented to consumers?
As previously mentioned, for UK and European flights, comparisons should be made between the emissions from the flight and emissions from other modes of surface transport (to cover the same journey). Additionally, the share of the flight emissions should be compared to the average annual emissions from a British person.

For long haul flights, the share of the flight emissions should be compared to the average annual emissions from a British person.

17. When should consumer environmental information be presented to consumers? (For example on the results page when searching for a flight, on a boarding pass or after a flight).
Information should be provided at the same time as specific flight information is displayed (alongside the price, exact take-off and landing times, etc.). Displaying the information post-purchase would be far less impactful.

18. How should consumer environmental information be presented? For example is kg/CO2 per journey appropriate and / or should consumer environmental information be presented as a comparison with other transport modes or other equivalent activities?
kg/CO2e per journey and corresponding percentages are appropriate, but for domestic and European flights should be provided for both train and car journeys as well. Additionally, it should be recognised that one car journey can carry four individuals, whereas the plane statistics should be on a per seat basis.

19. Please list/identify examples of consumer environmental information in other sectors which enable complex information to be provided in an accurate, understandable, standardised, comparable, accessible and useful way.
No response provided.

20. How should we (the CAA) use our existing powers to protect consumers from misleading environmental information?
Consideration should be given to what levels of fines should be imposed on information providers that fail to provide the required information.

21. Please list/identify examples of regulatory regimes in other sectors that work well to protect consumers from misleading environmental information.
No response provided.

22. How should the provision of consumer environmental information be monitored?
The CAA itself should monitor consumer environmental provision. It should have the power to fine companies that are not providing mandated information.

23. If you have an existing relevant methodology for calculating emissions from a journey:
a. please describe it and the reasoning behind it, including details of the types of information you include in the methodology and the assumptions you make.
b. If your organisation has made a conscious choice not to include certain types of potentially relevant information in your methodology yet, please set out the reasons why.
c. If potentially relevant information may be included in your methodology in the future, please describe the information and any necessary background to its potential inclusion.

No response provided.

24. If you haven't developed a methodology, what would you expect to see in a methodology (for example different aircraft types, fuels, average load factors, the airline's overall fleet, and routes including generalised indicators relating to destination / origin airports)?

The methodology should reflect the typical climate impact of the seat being purchased on that route. This should therefore take into account the average fuel used on a set journey and the likelihood of non-CO2 impacts happening, with a different impact estimated for different classes of seats.

It is acknowledged that this will not be perfect - airlines can, and do, change the planes they use for certain journeys, for various reasons. Furthermore, on some routes there is not much research on the likelihood of there being non-CO2 impacts. In this case, a standard multiplier should be used until better data is available.

25. How should we (the CAA) take non-CO2 emissions and their effects into account?

As mentioned above, for some routes there simply isn't much data on the likelihood of contrails forming. Therefore, a standard multiplier should be applied to the predicted CO2 emissions until such time as better data is available. This multiplier should be based on academic research, and the most rigorous research can be found in [this summary paper by a number of respected academics](#). Better data is available for some routes: for instance, [academic research into flights over the Atlantic](#) estimated that 50% of them produce warming contrails.

26. Which existing standardised datasets do you think could be repurposed (with the necessary safeguards) to provide environmental consumer information? For example, the International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) CO2 Estimation and Reporting Tool.

See answer to question 27.

27. Should there be a mandatory requirement for airlines to provide relevant environmental data to the CAA and if so how should this be aligned with existing requirements?

Yes. Airlines currently provide data to the Environment Agency for CORSIA reporting, and obviously they know the exact plane used and fuel burn per journey. This could be supplied to the CAA.

28. The CAA published research on what consumers want from consumer environmental information in 2021. Have you undertaken similar or related relevant research which you can share with us?

No.

29. What do you think are the potential pitfalls relating to the provision of consumer environmental information?

The pitfalls include going against what has been advised in this response. There are three major pitfalls: the first is allowing airlines to provide data using different methodologies, and the second would be to provide text information that has no context. However, perhaps the largest pitfall would be not giving the

CAA sufficient enforcement powers in the case that airlines do not supply required information or supply incorrect information, or booking providers do not display information as required.

30. What strategies should we consider to mitigate potential negative consequences?

Some strategies to mitigate potential negative consequences include:

- Developing a comprehensive and clear content and design guide for what is and isn't acceptable information for airlines/websites to provide, with clear examples given.
- Undertake discussions with the government to increase the statutory duties and resourcing of the CAA to ensure that there are sufficient powers and resources for enforcement action against non-compliant airlines/websites to be effective.

31. Is there anything else that you think we should be aware of in relation to the provision of consumer environmental information, beyond the areas mentioned above?

The Government and CAA should consider requiring airlines to state the climate effects on any promotional material, as well as at the point-of-sale. This is akin to the car industry, which is legally obliged to. It is odd that some industries with harmful impacts are heavily regulated, whilst aviation is so lightly regulated.

Further information

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