



2040 Zero Emissions Airport Target

Consultation Response

May 2023

This paper is Transport & Environment's (T&E) response to questions posed by the consultation [2040 zero emissions airport target](#).

T&E is Europe's leading clean transport think tank and campaigning group. It was created as a member organisation 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. T&E coordinates the International Coalition for Sustainable Aviation, which has observer status at the International Civil Aviation Organisation (ICAO); and is also an active member of the Jet Zero Council's SAF Delivery and commercialisation groups.

It should be noted that spending any political capital on decarbonising airports means that less is spent on the main challenge of decarbonising flights. In 2019, emissions from the largest 18 UK airports equalled nearly 250,000 tonnes. Emissions from international flights were 37 million tonnes, with further warming from the non-CO2 impacts that planes cause. Furthermore, [absolute emissions from airports have been trending downwards](#): the exact opposite to emissions from flights. When considering aviation's climate problem, it is clear where the focus should actually be.

Regardless, this consultation is woefully unambitious. Decarbonising the scope 1 and 2 operations of an airport is a relatively easy task compared with the task of decarbonising the actual flights. Under the UK's carbon accounting rules, an airports scope 1 and 2 emissions do not fall under 'aviation's' emissions, and so therefore this consultation will not have any effect, positive or negative, on the aim of the Jet Zero strategy's goals. The Government already has plans to have a fully decarbonised power sector by 2035, and sales of all new cars and vans will be zero emission from (at least) the same date. It is therefore confusing as to why 2040 was chosen as a target date by the Department for Transport: 2040 is not only unambitious, but almost gives airports a licence to decarbonise at a slower rate than other parts of society.

This lack of ambition is evident via a cursory look at the [ACI's list of airports that are already committed to net zero](#). Dozens of European airports already have net zero targets that are well before 2040. [Finland is implementing measures to ensure all its airports are net zero by 2025](#). Indeed, as can be seen in the table below, many UK airports already have net zero targets that are before 2040:

Net Zero Date	Airports
2030	Belfast, Bristol, Farnborough, Gatwick, Leeds Bradford, London City
2033	Birmingham
2035	Aberdeen, Glasgow, Heathrow, Newcastle, Southampton
2038	East Midlands, Stansted, Manchester

Whilst it should be acknowledged that ‘net zero’ is not ‘zero’, it is clear that Government ambition is woeful in this respect. Instead, legislation should be implemented that requires English airports to be zero emission by 2030.

Furthermore, any announcement following this consultation risks creating the false impression amongst the general public that aviation will be decarbonised by 2040. This is patently untrue, and therefore the Department for Transport needs to recognise this risk, and actively take measures to ensure that does not happen both in the publicising and marketing of the final decision and the design of the final obligations. Specifically, the Government should mandate that individual airports need to prominently publish data as to the total climate impact (greenhouse gas emissions and non-CO2 impacts) from the flights that depart from them. Airlines are already obliged to report their carbon emissions to the Environment Agency as part of their CORSIA reporting requirements, so this data is relatively easy to obtain and distribute. Consideration should also be given to requiring airports to annually publish a) how many zero emission flights (electric or hydrogen) have taken off from the airport, and b) what percentage of jet fuel uplifted at the airport was sustainable aviation fuel. Airports should also be obliged to publish decarbonisation roadmaps as soon as practicably possible.

The [Government’s own consultation wording](#) says that “*The zero-emissions airport target is not intended to hamper economic growth at airports, but to provide a social licence for growth*”, however it should be very clear that airports should not have a *social licence for growth* until any growth in flight numbers from an airport does not contribute to additional climate change. This echoes the Climate Change Committee’s recommendation that there be no net airport expansion until annual aviation emissions are clearly on a downward trajectory.

The ACI Airport Carbon Accreditation scheme is, to be blunt, greenwash. Airports should not need offsets to decarbonise: they can do so using established technologies such as solar panels and electric vehicles. Indeed, [Heathrow has pledged that all its conventional vehicles will be zero emission by 2030](#): there is nothing to stop all other airports doing so too. The main barrier to airports decarbonising is simple inertia. The Paris Agreement was signed in 2015, and therefore airports have all known since this date that they will have to decarbonise in the upcoming years.

To conclude, if the Government wishes to be ambitious with the decarbonisation of the country's airports, it should mandate that airports are zero emission by 2030, using existing technologies only (no offsets). This will require investment, but that investment would happen anyway.

Specifically in response to the consultation, T&E recommends the following:

- All airports, no matter the size, should be required, via legislation, to be zero emission (scope 1 and 2) from 2030.
- As part of this, all airports should be required to produce decarbonisation roadmaps (including any planned onsite electricity generation capacity) by the end of 2024.
- Irrespective of the final target date, the Government should impose an annual requirement on individual airports to publicly report the total (scope 3) climate impacts (greenhouse gas emissions and non-CO2 impacts) from all the departing flights.
- An immediate moratorium on all airport expansions, in line with the CCC's recommendation, should be implemented.

Further information

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