

Transport Committee: Inquiry into Government's aviation strategy and UK aviation capacity: response from Friends of the Earth

1. Friends of the Earth has made submissions into the aviation policy process throughout the recent period from 1998 onwards. We provided a major response to the process before the 2003 White Paper – 'Sustainable Aviation = Demand Management'; commissioned the early and pioneering work by Professor Kevin Anderson, Tyndall Centre for Climate Change Research on aviation's growing contribution to the future UK carbon budget; successfully advocated the inclusion of aviation emissions clause within the Climate Change Act 2008; advocated also the inclusion of aviation within the ETS; and made submissions in 2011 to the Coalition Government's 'Developing a sustainable framework for UK aviation' scoping document (SAFSD) and associated analyses, and on Air Passenger Duty. In parallel we have made a submission to the Committee's inquiry into HS2.
2. We therefore welcome the timing of the Committee's inquiry, just before the closing date for the DfT's final consultation phase before it prepares its 'Aviation Policy Framework' (DAPF) for intended publication in March 2013, and after recent months when the policy process has been repeatedly changed and disrupted. Consequently, and because we believe there are parallels between the course of this policy process and that which resulted in the 2003 White Paper, we are not just addressing the questions posed by the committee, but also commenting on the integrity of the policy process itself. Our views are supported by information provided at the DfT's environmental sector consultation meeting on Tuesday 9th October.
3. The process that produced the 2003 Air Transport White Paper was a troubled one, with in retrospect at least two major flaws: a failure to interact the development aspirations of the aviation industry to increase airport capacity with a requirement to reduce aviation's climate change emissions; and secondly a failure to underpin the White Paper with an analysis that impartially balanced 'economy' and 'environment', and within each sector balanced benefits with the *dis*benefits of expansion – all in a way that served the public interest rather than the aviation industry's interest narrowly. These and other flaws resulted in the entire aviation policy framework being withdrawn within 10 years, a situation which can be of benefit to no stakeholder and which has generated huge uncertainty. Consequently Friends of the Earth believes that two critical tests of the aviation policy framework process - which the Committee should be scrutinising for - must be: certainty and clarity as to how and when in the policy sequence the 'additional capacity envelope' and the 'aviation emissions envelope' are to be interacted; and whether the DfT in its policy proposals has moved beyond acting as apparent 'sponsor' of the aviation industry and its demands.
4. The process begun by the Coalition Government in 2010 - following the commitment in the coalition agreement ruling out new runways at Heathrow, Stansted and Gatwick - pointed to an improvement in these fundamental flaws, exemplified in the Foreword by the then Secretary of State to the March 2011 Scoping Document: "There is an urgent need for a genuinely sustainable framework to guide the aviation industry in planning its investment and technological development in the short, medium and long term. The previous government's 2003 White Paper, *The Future of Air Transport*, is fundamentally out of date, because it fails to give sufficient weight to the challenge of climate change. In maintaining its support for new runways – in particular at Heathrow – in the face of the local environmental impacts and mounting evidence of aviation's growing contribution towards climate change, the previous government got the balance wrong."
5. That scoping document - to which Friends of the Earth made a comprehensive response (appended to this submission) – contained nearly 50 questions encompassing capacity and connectivity (Qs 5.9-29) and climate change (5.30-39) as well as important issues such as regional rebalancing, planning and local governance. The questions themselves were stated reasonably neutral, thus not excluding by their design those views that challenged the industry perspective. It also set out a clear timetable providing certainty to all stakeholders that the final policy framework would be available within two years; that is much less than a protracted period required to produce the 2003 White Paper *SAFSD 1.17*
6. This was followed in July 2011 by the publication an initial DfT response to the Committee on Climate Change (CCC) aviation report of December 2009, combined with an encouraging analysis of the cost benefit opportunities for emissions reductions, and new capacity and

emission forecasts. In April 2012 CCC produced their *Scope of Carbon Budgets - Statutory advice on inclusion of international aviation and shipping*; the DAPF itself was subject to a series of publication delays before appearing in July 2012.

7. We submit that all stakeholders responding to the 2011 SAFSD had a right and reasonable expectation that its structure and topic coverage would flow through sequentially into the next and penultimate stage in the policy process, the preparation for consultation of the DAPF itself; and that that latter document would set out the developing government position particularly on issues around capacity and emissions - to which all stakeholders could then respond prior to the government's final determination of the framework; as well as its critical factual analysis of the scope or requirement for additional capacity provision. For example at an environmental sector consultation meeting on 7th September 2011 DfT indicated that they would be 'signalling' in March 2012 what would be the government's likely response to the CCC recommendation that aviation emissions should be included within the UK carbon budget, pursuant to clause 35 of the Climate Change Act 2008. This requires a response by 20th December 2012.

8. In its December 2009 report the CCC provided its own substantive analysis of the interaction between the climate change, passenger demand and airport capacity 'envelopes'. Whilst Friends of the Earth does not accept the starting point of the CCC analysis - that aviation emissions could be the same in 2050 as 2005, which forgets and forgives the 1990 baseline applied to all other sectors - at least their report does focus on the critical capacity v. emissions interaction. The DfT have therefore had nearly 3 years to indicate whether the Government is in broad agreement with this overall CCC analysis or alternatively whether they wish to challenge it. A clear statement of the government position about the 'capacity change v. emissions' interaction is, we submit, **the** critical component underpinning the effectiveness of the current policy process. If such critical components of the policy process are withheld until after the DAPF October closing date or indefinitely, then how can any stakeholder respond to the whole range of aviation issues at the final draft APF stage (July-October 2012) and before formal publication?

9. As these consultation stages have proceeded and over the last year, the DfT policy process has been the subject of relentless public relations and lobbying pressure by industry and party political interests - complaining about 'delay and dither', and focusing on capacity expansion alone - resulting in substantial changes to the process even after the draft APF was published in July 2012; the principal of these being the announcement of the Davies Commission on 7th September. Ironically the consequence of this disruption to the process has been to hugely extend the period of uncertainty, not just about longer term capacity provision but everything related to it, until 2015 (since the 2013 interim report will address short-term issues associated with existing capacity). Taking an overview on both the 2003 and 2010-onwards processes, the Friends of the Earth interpretation is that the comprehensive 'policy capture' of the DfT that the industry achieved in the earlier process was unexpectedly overturned when both Conservative and Liberal Democrat parties chose to oppose new SE runways, and that all the subsequent brouhaha has been an attempt by the industry to pressurise the restoration of that policy capture.

10. The consequences of this disruption of the policy process can be seen by contrasting the structure and content of the March 2011 SAFSD and its questions, with the reduced content of the July 2012 APF draft, as then subsequently revised still further. The DAPF is claimed to be 'a high-level strategy that sets out our overall objectives for aviation and the policies we will use to achieve those objectives' *para.1.5* - with stakeholders being encouraged 'to consider the 'big picture' before putting forward any proposals for new capacity' *former Secretary of State foreword* - but in reality it is no such thing. Instead the APF has effectively been emptied of most of its essential substantive content. Thus:

(a) Before the announcement of the Davies Commission, issues of airport capacity had already been withdrawn from the current APF process: "We will also need to identify deliverable solutions to the very difficult capacity challenge at our biggest South East airports, which is set to get progressively worse in the medium and longer term without effective action. This will be the subject of the separate Call for Evidence which we intend to issue later this year, once stakeholders have had a chance to consider this draft framework." *DAPF para. 2.27* DAPF contains no substantive information or analysis about future capacity forecasts, requirements or constraints. Although the Davies announcement did not include the Commission's membership

and modus operandi, or specific reference to climate change – and we are also advised that the full remit once announced will not be the subject of consultation – we welcome the commitment that it should be “part of a process that is fair and open and that takes account of the views of ... residents as well as ... local and devolved government and environmental groups” i.e those stakeholder wishing to challenge an expansionist argument.

(b) Issues relating to aviation emissions had also been effectively withdrawn from the DAPF consultation: “Given the practical complexities, the Government is carefully analysing the evidence and options presented. The Government intends to make clear its position later this year.” *DAPF 3.21* This position is inadequate and contradictory. Although DAPF states that the CCC advice was only provided in April 2012 it was clearly signalled in 2009 and in the 4th Carbon Budget report. Then *DAPF para 3.25* - which states that “The CCC's advice on **whether** international aviation (and shipping) emissions should be brought within the Climate Change Act ...” *our emphasis* is a misleading formulation given that the CCC's advice has already been provided. At the 9th October 2012 meeting DfT officials could not state when the government response would be available despite the fact that there are only 9 weeks to go before it has to be provided. Only two, limited questions about climate change have been asked in DAPF; none of the July 2011 MAC report analysis is referred to or advanced upon; and the proposed emissions objective – “to ensure that the aviation sector makes a significant and cost effective contribution towards reducing **global** emissions” *our emphasis* - which is a new formulation, attempts to introduce without transparent disclosure a major shift in policy emphasis (towards the global, rather than national/UK responsibility).

(c) In another parallel with the 2003 process, the issue of ‘demand management’ has been removed from the DAPF – and therefore from the toolbox of measures available for consultees to debate and recommend - even though it did feature albeit marginally in SAFSD (see question 5.22). In 2003 the concept of demand management was airbrushed out of the entire policy debate; in 2011 the pretext that ‘fiscal measures ... are a matter for HM Treasury’ was used to keep taxation and associated mechanisms out of the basket of initiatives tested by the DfT consultants to reduce aviation emissions *Government Response to the Committee on Climate Change Report on Reducing CO2 Emissions from UK Aviation to 2050 Aug 2011 para 1.13*, and the application of slot auctioning to ATMs was similarly not tested. Stakeholders who want to advocate demand management as a way of squaring the circle between pressures on capacity and emissions obligations are therefore disadvantaged compared to those arguing simply for physical expansion at this or that airport location.

(d) The imbalance between the treatment of the claimed ‘benefits’ of aviation – where the DfT analysis does not include **dis**benefits alongside benefits – and between the three ‘pillars’ of sustainable development – where economic and social benefits are accorded disproportionate weight compared to economic, environmental and social **dis**benefits - has been a constant feature across the 2003 and 2010-onwards processes. At the 9th October meeting officials were asked why Chapter 2 of DAPF was titled ‘The benefits of aviation’ rather than some more neutral wording, because this gave the appearance that the framework was there to serve the interests of just one industry, and a relatively limited number of companies, rather than the public interest. In our 2011 SAF response we identified, as a part of a set of three Principles, that ‘the air transport industry should be treated with **equality**, ‘neither privileged or demonised’.

(e) It has been known for some time that, in a major change from the 2003 framework, the DfT intended that its successor would not be ‘locally specific’; whereas the 2003 White Paper had, airport by airport, identified the scale of expanded capacity that would be supported at that location, which then fed across to the planning framework, where the content of the WP was used by individual airport operators in support of planning applications. This major shift in approach obviously prompts a very important question: in the absence of locationally specific guidance how will expansion proposals at individual airports be prepared and then taken through the planning process? SAFSD did canvass views on this (“... we welcome responses [on the NPPF] from aviation stakeholders with an interest in planning”) and Friends of the Earth set out at some length some initial thoughts on the complexities and difficulties created by the changed approach (*FOE SAF response p.11-12*).

The approach of DAPF to this issue - which followed the publication in March 2012 of the National Planning Policy Framework - is wholly inadequate. DAPF paras 6.3-6.5 and NPPF

para.33 are not just excessively brief but almost contentless in terms of substantive guidance to Local Planning Authorities, airports and the communities around them. The meeting on 9th October also confirmed that the final APF would not constitute a National Planning Statement, which appears to contradict the position advanced in SAF SD ("The final aviation framework document will fulfil the role of a national planning policy for aviation." 2.17)

When asked a series of points about how LPAs etc would be able to assess and determine airport applications - how would an LPA deal with impacts beyond its boundaries; or cumulative impacts e.g at a national level including emissions; or pre-emptive 'first come, first served' applications by airports seeking to secure for themselves a portion of a limited and diminishing national capacity allowance? - DfT officials had no answers whatsoever to offer except that in general planning issues were the responsibility of another department (DCLG). It seemed apparent that the DfT has given no thought to how the previous locationally specific planning framework should be replaced, or the consequences to all stakeholders of leaving a framework vacuum. When NGOs suggested that there might be a need for LPA guidance this was noted as a new thought; at the same time the discredited Airport Masterplan and Surface Access Guidances are proposed in DAPF to be continued.

11. **Friends of the Earth comment:** From the above analysis we maintain that the DfT have in this final stage of the APF process/sequence and in the last few months, recreated exactly the same set of circumstances that led to the failure of the 2003 framework. Then 'airport capacity' and 'climate change' analyses were available within the policy framework being consulted upon (although the latter had substantial deficiencies) but were kept separated from each other throughout the consultation and **not** interacted; now in 2012 they have actually been removed from the framework under consultation. At the 9th October meeting in answer to question from friends of the Earth, officials were unable to indicate **how and when the two critical envelopes - of future airport capacity and aviation emissions - were going to be interacted within a formal policy framework open to stakeholder engagement.**

Apparently the government position on what the envelope of aviation emissions *might* be - not available before the consultation closes, and with uncertainty surrounding whether the subsequent announcement will be open to consultation or not - will be handed to the Davies Commission who will be required to work within it. But what form will it take; will there be provided the actuality or components of an emissions reduction trajectory in absolute tonnages to which capacity limits can be fitted?

12. In 2010-12 as in 2003 there is the same lack of evenhandedness in the presentation of the issues - which should allow all stakeholders to put forward views important for a subsequent DfT 'balancing' in the public interest; a failure to carry forward information and issues from the previous consultation stage into the final Draft; and astonishing gaps in what is almost the final version of the Framework.

13. We submit that **the Transport Committee in addition to answering its own questions around capacity should also consider the integrity of the policy framework itself and the process producing it.** And bear in mind the words of the new Secretary of State in his Davies announcement: "Successive Governments have sought to develop a credible long term aviation policy to meet the international connectivity needs of the UK. In each case the policy has failed for want of trust in the process, consensus on the evidence upon which the policy was based and the difficulty of sustaining a challenging long term policy through a change of Government. The country cannot afford for this failure to continue."

Responses to the Transport Committee questions

Q1 - What should be the objectives of Government policy on aviation? The 'objectives' set out on DAPF pages 7-9 of do not constitute properly framed objectives that can be used to drive and direct a long-term aviation policy; for example, they are not SMART and are without appropriate quantification, and they are poorly worded. Above all they do not engage with the principal longterm issue for UK aviation: to reconcile capacity requirements with emissions reductions. We refer the Committee also to the three 'principles' of our SAF response (page 3).

- a. How important is international aviation connectivity to the UK aviation industry?
- b. What are the benefits of aviation to the UK economy?
- c. What is the impact of Air Passenger Duty on the aviation industry?

14. All three of these questions are too 'leading' in their nature, inviting different segments of stakeholders to put forward a partial view which in the case of industry responses – quite likely to be the majority - will be commercially self-interested. 'International aviation connectivity' will be *relatively* important to the UK aviation industry; and the benefits of aviation to the UK economy will also be *relative*, to be set alongside some disbenefits. What the public interest requires - at this late stage of the aviation policy process – is a dispassionate and balanced analysis and presentation by the Department for Transport of its answers to all the Committee's questions, to which stakeholders could then challenge, and the Committee scrutinise; and this the DAPF does **not** provide. The recent increases to APD, initiated before Coalition Government's abandoned exercise to replace it with a different regime are at least relatively restraining on longer distance journeys with their higher emissions; have little impact on shorthaul journeys where the vast majority of UK leisure travel is undertaken; and in its total revenue makes up for undertaxation of the industry.

e. Where does aviation fit in the overall transport strategy? We repeat our response to Q1 of the Committee's HS2 inquiry: "Set against the DfT policy backdrop of the last 30 years - with its pattern of repeated failures [including 'aviation expansion'] - the proposed commitment to expansion of the rail network represents a refreshing change of strategic direction. If this represents a fundamental shift in favour of 'strategic Rail', as against 'strategic Road' and 'strategic Aviation' then FOE strongly supports this, but it must be embedded within both a long-term national transport policy which gives certainty to this new direction, and a comprehensive expenditure programmes through to 2030, organised around carbon reduction and also contributing to overall sustainability."

Q2. How should we make the best use of existing aviation capacity?

a. *How do we make the best use of existing London airport capacity? Are the Government's current measures sufficient? What more could be done to improve passenger experience and airport resilience?*

b. *Does the Government's current strategy make the best use of existing capacity at airports outside the south east? How could this be improved?*

15. We believe that capacity questions must **only** be addressed in the context of the available emissions 'envelope'. Since it has not been challenged we suggest the Committee should follow the analysis of the CCC 2009 report, from which we select two findings: "Together these [*fleet efficiency improvements, biofuels use*] would allow meeting the target with demand growth of around 60% in the period to 2050 (e.g. compared to unconstrained demand growth of over 200%)." CCC 2009 136; and "The key implication from our analysis is that future airport policy should be designed to be in line with the assumption that total ATMs should not increase by more than about 55% between 2005 and 2050, i.e. from today's level of 2.2m to no more than around 3.4m in 2050" CCC p.149, in the situation where maximum runway capacity in 2005 was already at 5.58m ATMs Table 7.1a. Converting this limit to passenger numbers, "an increase in passengers of around 60% on 2005 levels by 2050 would be possible, taking total annual passenger numbers from 230 million to around 370 million" CCC 145.

16. The Committee should also consider the analysis of *Available UK airport capacity under a 2050 CO2 target for the aviation sector* AEF for WWF June 2011, that current runway capacity is at 42.2% (ATMs) and terminal capacity 65.8% (passengers) table page 5; and note how the DfT demand forecasts have been substantially and progressively reduced between the 2003 White Paper (Annex A), the 2009 and finally the 2011 forecasts. Notwithstanding these downward revisions the current DfT 2050 unconstrained central passenger forecast is 520mppa 2011 table 2.7 and constrained forecast 470mppa table 2.11, whereas the CCC ceiling is set at 370mppa.

17. The two conclusions about the overall approach to capacity policy we draw from the CCC analysis is that the emphasis need to be on (i) quite the opposite of 'expansion'; instead it should be 'constraint' - of both capacity and demand; and (ii) on tackling the lack of fit between the location/distribution of available capacity and of demand.

18. So contrary to the hysterical and largely evidence-free clamourings emanating from the industry over recent months **it cannot seriously be claimed that in general the UK is experiencing a shortage of airport capacity, requiring an immediate and expansionist**

response. This would amount to policy making 'in a panic', and in quite the wrong longterm direction. The DfT's positive overview of capacity and connectivity in DAPF paras 2.17-25 is therefore credible, as is its stated objective: "to around 2020, a key priority for us is to ... make much better use of existing runways at all UK airports." 2.28 Of course there are greater pressures on the SE airports – generated by longrun regional imbalance across the UK economy, which should be countered, not reinforced – but in terms of connectivity with BRICS market we support the DfT analysis in 2.23-25. Those asserting that the Heathrow Hub is disconnected from Chinese growth centres should read Table 9 (p.48) of BAA's own *Connecting for growth: the role of Britain's hub airport in economic recovery* (Frontier Economics Sept 2011) with greater care, in view of the huge dominance of the Heathrow hub connecting to the Hongkong hub. In any case if there is a case for a changed or extended business route network that should be a market response by airlines (not airports) responding to customer wishes.

19. The way to make the best use of existing aviation capacity, in the SE or regional, is to develop and implement an effective demand management framework – which will also serve the parallel purpose of bearing down on emissions. As in 2003, this has been comprehensively excluded from DAPF. We suggest that, **by way of working methodology in its examination of capacity, the Committee should first understand the Climate Change Act-consistent emissions envelope applicable to any time period (e.g using carbon budget periods, to 2050); then** identify any capacity shortfall/surplus consistent with that emissions trajectory; **then** examine all mechanisms that will incentivise better/best use of existing capacity, and restrain demand; **and only then consider the possibility of additional capacity.**

c. How can surface access to airports be improved? By airports agreeing to meet the infrastructure costs of so doing, which are very considerable (the cost for a new Estuary airport has been identified by the London Mayor at £30 billion). One of the claimed advantages of expanding airport infrastructure is that the cost will largely be met by the private, and not the public, sector. However this advantage is immediately forgotten by airport operators (with the exception of the three major SE airports) when they bring forward particular proposals for improved surface access which they then request that public funding should substantially pay for. The proper requirements of 2003 ATWP 4.56-58 that airports should bear their own surface access improvement costs were never respected by private and public decision makers alike, nor have they been carried forward into DAPF; indeed they appear to have been set aside DAPF 2.81

Q3. What constraints are there on increasing UK aviation capacity?

- a. Are the Government's proposals to manage the impact of aviation on the local environment sufficient, particularly in terms of reducing the impact of noise on local residents?*
- b. Will the Government's proposals help reduce carbon emissions and manage the impact of aviation on climate change? How can aviation be made more sustainable?*

Q4. Do we need a step-change in UK aviation capacity? Why?

- a. What should this step-change be? Should there be a new hub airport? Where?*

20. The constraints are twofold: the first, already well established, are the type of constraints identified in questions (a-b): essentially environmental constraints, local (such as noise and air pollution, for example around Heathrow) and national/global (climate change emissions). The way that the proponents of expansion generally deal with these is simply to ignore them. But the second constraint is new to the 2010-onwards process, which is that now there is a genuine and public disagreement amongst the proponents of expansion as to its preferred location: should it be at Heathrow, Gatwick/Stansted, an Estuary airport, distributed across other SE airports, or further afield and principally Birmingham?

21. We submit that it is the responsibility of government alone - and not an array of airport and developer interests; other stakeholders including Friends of the Earth; even the Transport Committee itself! - to create the transparent, impartial and consultative policy framework and process within which these complex and deeply controversial issues can be properly explored and then resolved – in the public interest. This the DfT has failed to do with DAPF as it fragmented under industry and political pressure. The Government's inability to confront the growing local environmental problems around Heathrow contributed to the withdrawal of the 3rd Runway proposal; as noted, the government had still not responded substantively to the CCC 2009 report, its emissions envelope, and recommendation for UK carbon budget inclusion; and the decision to outsource the investigation of capacity issues to the Davies Commission is a

further admission of policy collapse.

22. And it is also the responsibility of government alone to demonstrate conclusively - in view of the very long life of new airport infrastructure, their huge local impacts and emissions uplifts - that there is indeed a need for a 'step change' in the UK aviation capacity, because the consequences for the communities in the way of that 'step change' will be devastating, even annihilating. The Government has not done this in a measured and analytic way that commands confidence, as the current process has been overwhelmed by sectional interests.

23. Q3b) talks about the 'Government's proposals' to manage the impact of aviation on climate change but, as noted, at the moment there aren't any contained within DAPF despite the fact that the detailed DfT report accompanying their CCC response in August 2011 demonstrated the considerable opportunity to "... reduce the estimate of total UK aviation emissions in 2050 (in the absence of further government intervention) under our central baseline forecast to about 30 MtCO₂ in 2050" *DfT CCC 3.12* - that is considerably below the 37.5 MtCO₂ 2050 indicative ceiling identified in the CCC 2009 report. The accompanying MAC Technical report set out outputs for 'estimated 2050 UK aviation emissions after all levers implemented' for nine demand baseline/policy cases ranging between 15.9 and 37.9MtCO₂, again almost all below the CCC ceiling *MAC report table (i)*. Individual airlines are now prepared to sign up for 50% emissions reductions by 2050 against at 2005 baseline *BA Corporate Responsibility report 2012 p.24*, although it should be borne in mind that this gives aviation an enhanced baseline of 1990 **plus 122%** whereas all other economic sectors are having to work towards 1990 **minus 80%**.

24. The Committee are requested to review in detail the evidence session into carbon budget inclusion conducted by the Energy & Climate Committee on 16th October. David Kennedy for the CCC stated that the inclusion of IAS (international aviation & shipping emissions) is assumed in the overall UK 2050 80% reduction target, in the four carbon budgets to 2028, and DECC 2011 Carbon Plan assumptions. It involves no additional commitments or costs. Since the CCC assumption is that IAS emissions in 2050 will be 25% of the UK total, it's better to have a comprehensive accounting framework in place now. Thus, for the CCC, IAS inclusion is essential in order to maintain the integrity of the Climate Change Act; the EU ETS and its cap is the mechanism delivering the emissions reduction, for which the 'country allocation' mechanism is now judged to be acceptable. He concluded that there is not an evidence-based case for the lowering of the UK's emissions reduction ambition that the non-inclusion of IAS would represent. The representatives of Sustainable Aviation (the industry initiative) and UK Chamber of Shipping both supported inclusion. The DfT for their part accepted that any costs associated with inclusion was already allowed for up to 2028, and that their concerns about costs thereafter were in relation to those which would fall on all *other* sectors.

25. The privileged treatment of the aviation industry is being achieved at the expense of all other UK economic and social sectors which is why - to ensure a level playing field, to provide the constraining framework for aviation policy, and to avoid undermining the Climate Change Act - **Friends of the Earth strongly urges the Committee to support the recommendation of the Committee on Climate Change that aviation emissions are included in the UK Carbon Budget.**

19th October 2012