

Response ID ANON-9WXU-TBQH-C

Submitted to Consumer Environmental Information: Call for Evidence
Submitted on 2023-04-06 17:37:34

Contact information and publication of responses

1 What is your name?

Name:
Mary Stevens

2 Are you responding from an organisation or as an individual?

Organisation

3 What is your organisation?

Organisation:
Institute of Acoustics

4 What type of organisation is it?

What type of organisation?:
professional membership institute

5 What is your email address?

Email:
mary.stevens@ioa.org.uk

6 What country are you responding from?

What country are you responding from?:
England

7 Can we publish your response?

Yes

Consumer environmental information

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

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

They do not include noise – which, as recognised in Paragraph 1.2 of CAP 2395, is a significant environmental impact of aviation activities both on human health and the wider environment. Given the data about noise emissions that are available, this is a conspicuous omission.

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

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

Data about noise from aircraft includes which WebTrak provides live noise tracking for Heathrow, Gatwick and Stansted

Presentation of information to consumers

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

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

As indicated in the response to Question 8, the absence of information about noise is very apparent. The key requirements are that the data provided are accessible to the public, are meaningful but maintain technical integrity. This is a challenge for a topic such as noise, striking the balance between accessibility and technical integrity. Members of the Institute of Acoustics are very experienced in finding that balance and would be willing to assist the CAA in this area.

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

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

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12 What are the key requirements for the presentation of standardised consumer environmental information?

What are the key requirements for the presentation of standardised consumer environmental information?:

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13 What are the key requirements for the presentation of comparable consumer environmental information?

What are the key requirements for the presentation of comparable consumer environmental information?:

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14 What are the key requirements for the presentation of accessible consumer environmental information?

What are the key requirements for the presentation of accessible consumer environmental information?:

As indicated in the response to Question 8, the absence of information about noise is very apparent. The key requirements are that the data provided are accessible to the public, are meaningful but maintain technical integrity. This is a challenge for a topic such as noise, striking the balance between accessibility and technical integrity. Members of the Institute of Acoustics are very experienced in finding that balance and would be willing to assist the CAA in this area.

15 What are the key requirements for the presentation of useful consumer environmental information?

What are the key requirements for the presentation of useful consumer environmental information?:

As indicated in the response to Question 8, the absence of information about noise is very apparent. The key requirements are that the data provided are accessible to the public, are meaningful but maintain technical integrity. This is a challenge for a topic such as noise, striking the balance between accessibility and technical integrity. Members of the Institute of Acoustics are very experienced in finding that balance and would be willing to assist the CAA in this area.

16 What consumer environmental information should be presented to consumers?

What consumer environmental information should be presented to consumers?:

Alongside CO₂ impacts, information on noise. This could include but not limited to categorising the aircraft types according to their noise certification values or their ICAO noise chapters. Furthermore, for individual airports, an estimate of the population overflow on individual departure and arrival routes.

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).

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) :

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?

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?:

For noise, factors like extent of population overflow on a particular journey on departure or arrival, possibly also taking account of the time of day the flights occur. For example, Flight X to this destination will flyover X thousand people until the aircraft reaches a height of X thousand feet. Or on arrival, the number of people within 500m either side of the arrival track from starting when the aircraft has descended to X thousand feet.

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.

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. :

Consumer protection

20 How should we (the CAA) use our existing powers to protect consumers from misleading environmental information?

How should we (the CAA) use our existing powers to protect consumers from misleading environmental information? :

21 Please list/identify examples of regulatory regimes in other sectors that work well to protect consumers from misleading environmental information.

Please list/identify examples of regulatory regimes in other sectors that work well to protect consumers from misleading environmental information.:

22 How should the provision of consumer environmental information be monitored?

How should the provision of consumer environmental information be monitored?:

23 If you have an existing relevant methodology for calculating emissions from a journey:

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.:

Given noise is not included at present, it is not appropriate to develop any further detail at this stage. The IOA would be happy to liaise further.

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)?

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Given noise is not included at present, it is not appropriate to develop any further detail at this stage. The IOA would be happy to liaise further.

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

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

See the responses to Q16 and Q18 for examples of factors that the CAA could consider.

Data

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.

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.:

Given noise is not included at present, it is not appropriate to develop any further detail at this stage. The IOA would be happy to liaise further.

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?

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?:

No

Relevant research

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?

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?:

File upload for any relevant research:

No file uploaded

Potential pitfalls and any other additional information

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

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

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

What strategies should we consider to mitigate potential negative consequences?:

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?

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?: