

## Response ID ANON-9BKQ-X49W-K

Submitted to Consumer Environmental Information: Consultation on draft principles for aviation consumer environmental information  
Submitted on 2024-10-14 18:05:06

### Additional information

Additional information on the Draft principles and Options for applying these principles.

### Contact information

1 What is your name?

Name:  
Mary Stevens

2 What is your email address?

Email:  
mary.stevens@ioa.org.uk

3 What country are you responding from?

country name:  
United Kingdom

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

Organisation

### Organisation questions

5 Which organisation are you responding from?

organisation name:  
Institute of Acoustics

6 What type of organisation do you represent?

Professional membership institute

If OTHER, please advise.:

### Publication of responses

7 Can we publish your response?

Yes

8 Your responses and evidence (including information you mark as confidential) may be shared with the Department for Transport for the purposes of data analysis and policy development.

Tick this box if you do not agree with sharing your responses with the Department for Transport for data analysis and policy development:

No

### Draft Principles of Aviation Consumer Environmental Information

9 Please rank each of the draft principles from 1 (most important) to 9 (least important)

ranking of principles - Accessible – environmental information should be easily accessible to all consumers wherever flights within, to or from the UK are advertised or sold.:

ranking of principles - Transparent – publishers of environmental data aimed at aviation consumers should publish their methodologies to ensure that it is clear how calculations have been made.:

ranking of principles - Accountable and accurate – publishers of environmental information are accountable for the accuracy of the calculations and for ensuring the most accurate, up to date and credible sources of input data are used.:

ranking of principles - Specific – environmental information should be calculated using data that is as specific as possible to the passenger's choice of flight. This means that it should be based on input data that relates specifically to the airline in question (for example, aircraft type, route, seat choice, average load factor, cargo weight proportion etc.). Where specific input data is not available, the most credible alternative data should be used. All sources of input data should be clearly referenced.:

ranking of principles - Timely – the environmental information should be updated regularly to reflect any operational changes that may impact any input used in environmental calculations.:

ranking of principles - Consistent – the same environmental information should be available wherever flights are advertised or sold. Airlines should seek to ensure that, where they publish environmental information related to a flight, that the same information is also available wherever else those flights are advertised and sold. Where third parties publish environmental information related to a flight, they should seek to ensure that it is (as a minimum) aligned with information provided by airlines.:

ranking of principles - Standardised – the publishers of environmental information should meet minimum standards for measuring and reporting environmental data to ensure consistency and comparability between different airlines and flight options.:

ranking of principles - Comparable – environmental information (when using a metric) should be shown using standard metrics – kg CO<sub>2</sub> or kg CO<sub>2</sub>e per passenger journey.:

ranking of principles - Subject to continuous improvement – publishers of environmental information should consider how publishing that information could encourage improvements to aviation sustainability performance and build in mechanisms to measure consumer impacts of publishing this information and enable this information to form part of business improvement decisions.:

Please explain the reasoning behind your ranking of the draft principles:

We have not answered these questions given we are responding in the context of policies on noise. It is acknowledged in the Summary of Responses to the Call for Evidence - "There were several comments on the impact on public health of noise emissions from aviation (in answer to this and other questions) and recommendations that information about noise should also be considered for inclusion." This consultation covers 'environmental information' on CO<sub>2</sub> so this is disappointing. In addition, the consultation says this 'Environmental Information' is line with the Environmental Reporting Guidelines, which on p.88 say "Assess the scale of air, water, noise, and light emissions that may impact on the environment". This proposal is for consumer information on CO<sub>2</sub>, not 'environmental' information. If noise continues to be excluded from this reported environmental information, what arrangements will be put in place to capture noise emission information?

10 To what extent, if at all, do you agree or disagree that the draft principles provide actionable guidance for airlines on data publication?

Not Answered

Please explain your answer:

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11 In relation to the draft principle that information should be timely, how often do you think the data should be updated?

Not Answered

12 In relation to the draft principle that the information should be standardised, how would you define "minimum data standards" for measuring and reporting environmental data? Would the Government's Environmental Reporting Guidelines provide an appropriate framework or can you suggest alternatives?

text box to answer on minimum data standards definition:

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## Options for implementation of the principles

13 Please rank the following options for implementation of the principles based on your preference between 1 (most preferred) to 4 (least preferred).

ranking of options - Option 1:

ranking of options - Option 2:

ranking of options - Option 3:

ranking of options - Option 4:

Please explain your answer:

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14 For option 1, what is the likelihood that your organisation would participate in a consumer environmental information scheme that conformed to the principles if it were voluntary? Please answer realistically.

Don't know

Options for implementation of the principles continued

15 Would your organisation like to work with the CAA to pilot a consumer environmental information scheme?

Don't know

16 Which, if any, of the following do you think are barriers to your organisation implementing such a scheme? (Please select from the list or specify "Other" with a brief explanation.)

Other

If OTHER, please provide a brief explanation:

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Options for implementation of the principles continued

17 When do you think any such scheme should commence?

Not Answered

Please explain your answer:

no comment

18 Does your organisation currently undertake any verification for your emissions data internally?

Not Answered

If YES, please provide a brief explanation:

not relevant

19 To what extent do you think there is value in implementing a verification requirement for CO2 calculations for the information provided to passengers?

Not Answered

Please explain your answer:

No comment

20 Should environmental information be integrated into the global distribution system alongside ticketing and scheduling information?

Yes

21 Do you think that airlines or other relevant organisations should be required to publish CO2e data or CO2?

Yes

Please explain your answer:

If noise continues to be excluded from this reported environmental information, what arrangements will be put in place to capture noise emission information and make that available to the public?

22 Recognising the current scientific uncertainty, do you agree or disagree that non-CO2 emissions should be included in the calculations and verification?

Don't know

### Additional comments and feedback

23 Is there anything else you would like to share or any additional comments you have regarding the topics discussed?

Text box for additional comments or feedback regarding the topics in this questionnaire:

We were invited by CAA to respond to this consultation, and are responding in the context of policies relating to noise. This consultation is considering 'environmental information' as CO2. This is disappointing given that it is acknowledged in the Summary of Responses to the Call for Evidence - "There were several comments on the impact on public health of noise emissions from aviation (in answer to this and other questions) and recommendations that information about noise should also be considered for inclusion." In addition, the consultation says this 'Environmental Information' is line with the Environmental Reporting Guidelines p.88 "Assess the scale of air, water, noise, and light emissions that may impact on the environment". The proposal is for Consumer CO2 information, not 'environmental' information.