

## Jet Zero Strategy: a deregulated framework for aviation demand, capacity & emissions

*Anthony Rae is an aviation campaigner based in the North of England, who over the last 2 decades was written aviation consultation response for Friends of the Earth and Campaign for Better Transport. Late on the night before the DfT's JetZero Strategy (JZS) was published on 19th July he received an embargoed copy of the strategy and sat down and wrote this piece, which was then circulated to the Airportwatch network of aviation campaigners.*

In April this year, when responding to the DfT Further Consultation for their forthcoming Jet Zero strategy, the penny finally dropped on what they were intending. And so I placed a 'bet' on what the core content of the JZS would be. It would establish, but without explicitly disclosing it, a new aviation policy framework for the 2020s and beyond with **no regulatory restraints at all on passenger demand, airports capacity and emissions expansion**, leaving all these outcomes to be determined by how the market actually developed. A truly audacious gambit by the DfT policymakers but one which, now finally reading the JZS itself, we can see that they have actually pulled off!

In truth I was never in any danger of losing the bet, because all it involved was recognising the DfT's barely concealed intentions: to insert their previous policy stance of the last two decades - which had resulted in aviation emissions almost doubling from the 1990 baseline - within the proposed new, ostensibly 'decarbonising', policy framework for the 2020s and beyond. Their objective was hidden in plain sight, if that is you understood where they were heading for.

The cleverness of the DfT's approach has been in the masterly deployment of their by now familiar box of tricks:

- **use of misdirection** whereby the attention of consultees and commentators was diverted into discussions around 'sustainable aviation fuels' and 'net zero aircraft' so that they didn't instead challenge that e.g even at the 2050 end date, aviation emissions would still be at the same level as the 1990 baseline - so no actual decarbonisation at all across the 60 year path to Net Zero; and that DfT had removed the concept of 'cumulative emissions' from their analysis.

- **deployment of magical language** If you can get beyond the blizzard of vaunting language and contradictory hyperbole in the Foreword ('aviation as part of the solution to climate change' page 5) you'll observe how JZS systematically deploys the use of ambiguous language which creates a mirage of 'commitments' and relies on the absence of precise definition (examples of this technique are underlined below). At the heart of the ambiguity is the concept of 'Jet Zero' itself where, by only reducing carbon emissions in 2050 to around 20MtCO<sub>2</sub>, the DfT is making a land grab on the largest tranche of residual 2050 removals.

- **'omission' instead of 'commission'**: the trick to deciphering the document is to understand what it doesn't say and contain, more than what it does: above all the absence of any policy framework that engages with the relationship between passenger demand, airport capacity and the resultant emissions trajectory, so as to deliver the latter. It's what is missing from its menu of 6 types of 'measures' it will use JZS p.25-6 that counts. Another absence is the DfT's by now ritual ignoring of the Climate Change Committee - there are only two references to the CCC (outside the issue of non-CO<sub>2</sub>) - by which they express their refusal to acknowledge its framework. On the other hand JZS can be explicitly clear when it wants to be: in its refusal to countenance constraints on passenger demand or airport capacity.

Collectively these methods, standard disinformation techniques, are used to create the illusion of action on decarbonisation whilst the opposite intention is hidden just below the surface.

Here's what JZS says, to demonstrates that indeed it contains no regulatory framework for ...

**Passenger demand:** There are two clear statements (page 10 and para.3.57) that 'we can achieve Jet Zero without the Government needing to intervene directly to limit aviation growth'. However all references to the demand growth assumptions of 70% by 2050 in the Further Consultation have been omitted from JZS itself, with only the oblique reference to the issue in the tiny print of footnote iv on page 15.

**Airport capacity:** The declaration supporting unrestrained airport expansion in the infamous footnote 39 of the JZ Consultation is repeated again in JZS 3.61 and its footnote 59.

**Emissions pathway:** The language deployed by JZS is **i)** to 'set' a trajectory (what exactly does that mean in emissions policy terms?) combined however with specific interim targets - 35.4MtCO<sub>2</sub>e in 2030 and 28.4Mt in 2040 - which have a precision which distracts from the realisation that these are still 69% and 35% respectively above 1990; and then **ii)** to make repeated reference to 'monitoring'\* and 'measuring' progress against that trajectory, but with no reference to any specific actions in the event of non-performance or to a policy framework which would actually enforce the trajectory. (\*Technically they will 'work with the CAA to explore how we can use the emissions reduction trajectory most effectively to monitor progress'). In terms of upper limits it's now 'we will aim to ensure that emissions do not go above 2019 levels' i.e 86% above 1990. Even the start of monitoring is delayed until the second half of the 2020s: 2025 for the first annual review and 2027 for the first 5 year review. If the latter reveals that the trajectory is not being achieved then the intention would be to 'adapt our approach based on progress made' or 'further action will be considered including amending our existing policies or developing new ones'.

Behind this language smokescreen, information omissions, and lists of genuine measures **not** included, there is in fact no substantive policy framework for constraining aviation demand, airport capacity, and emissions.

What are the consequences of DfT having been able to smuggle this illusion of a decarbonisation regime into the core of the NZ process? Although aviation and its policymakers are mercifully a single rogue sector within government, nonetheless this outcome is relatively disastrous on quite a number of levels. It's:

- an explicit rejection of the CCC's overall framework for aviation, the first by any government department.
- a complete deregulation in policy terms of the key triangle of aviation demand, capacity and emissions (outside of the application of the UK ETS). These will now all be left to the market.
- consequently a significant and deliberate expansion of emissions pathway risk, seeing that the aviation pathway then interacts within the larger total transport pathway, which in turn is the largest sector of the UK carbon budget. Over time the aviation 'numerator', unconstrained by regulation, has the potential to destabilise both the larger TTE and UKCB 'denominators'.
- a successful retention by DfT of their previous policy stance promoting aviation expansion, such that across the 60 years to the 2050 NZ end date the sector will have delivered no decarbonisation at all against its 1990 baseline, regardless of the consequences for cumulative emissions, which have gone unquantified and been ignored. Concerns to limit cumulative emissions inside carbon budgets is of course the core concept for the Climate Change Act.
- it will place all campaigners - around demand, local airport expansion, and emissions risk - on a collision course with the DfT for the next decade but with the odds now stacked against them.
- an endorsement of the 'guilt free aviation' message irresponsibly put into the public domain by the government - repeated again on JZS page 5.

The fact that DfT are still proceeding with such a policy announcement on the day when the UK is facing a 'Red Extreme Heat Warning' for the first time is testimony to how invulnerable they feel from any pushback. They must have calculated they can get away with it.

Anthony Rae - ar@anthonyrae.com  
19th July 2022