

Carbon Offsetting in Transport - A Call for Evidence
Department for Transport
Response from Richmond Heathrow Campaign
26 September 2019

INTRODUCTION

1. This is a written response of the Richmond Heathrow Campaign (RHC) to the DfT's Call for Evidence titled '*Carbon Offsetting in Transport, July 2019*'.
2. Aviation's carbon emissions do not have a localised impact (except from the relatively small airport ground traffic). But there is a substantial impact from road access to the UK's airports, especially where there is inadequate road capacity and resultant congestion.
3. The report by the Committee on Climate Change '*Net Zero: The UK's contribution to stopping global warming May 2019*' recommended to Government a new emissions target for the UK which is net zero greenhouse gases by 2050. On 24 September 2019 the Climate Change Committee (CCC) advised government of the need to manage UK aviation passenger demand in order for the UK to meet the target of net zero greenhouse gases by 2050. At this point in time we do not know how the Government will take forward the CCC's recommendation to include aviation in the climate change budgets and how demand management will be implemented and to what effect. But aviation is one of the 'hard to reduce' sectors and inevitably by 2050 there will still be a need for substantial offsets to aviation's gross carbon emissions to achieve net-zero carbon for the sector and the UK as a whole.
4. By 2050 aviation will be the largest carbon emitter in the UK and other forms of transport are likely to trend towards zero emissions. Our response focusses on aviation offsets.

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RICHMOND HEATHROW CAMPAIGN RESPONSE

General

5. We support individual consumers offsetting their carbon footprint. This creates awareness of the climate change issue and potentially brings the issue into focus with other lifestyle issues and encourages choice that includes a reduction in individual carbon footprints. However, there are a number of caveats:
 - a. It is said by some that consumer offsetting does not encourage people to reduce their carbon footprint but is merely an excuse for no action. Others say people offsetting travel by air are likely to be concerned by climate change and are likely to be managing down their footprint, even if this is just making a choice between alternative flights and not whether or not to fly.
 - b. The carbon price tends to be low so far in the history of offsetting - so paying an extra £50 to fly between London and New York (CO₂e 1 tonne) is nowhere near sufficient to offset the carbon needed to tackle climate change. It is said that on average each person should have a carbon footprint of no more than 0.6 tonnes a year. In Europe the average emission is over 8 tonnes of CO₂e.
 - c. Offsetting schemes, even when highly regulated, may not achieve the negative carbon expected.
 - d. Accounting for the carbon emitted and offset can be inaccurate - resulting in distortion of the market.
 - e. Individual offsetting is usually voluntary and therefore the overall response will probably not be sufficient to fully offset the carbon emissions from aviation.
 - f. Afforestation is now less popular than other offsetting projects. Trees absorb carbon as they grow and they take up a large amount of land and when mature the carbon reduction reduces considerably so that the efficiency is questionable. The availability of enough good offsetting projects will become an growing issue as the world increasingly seeks to offset carbon.
6. The alternative for aviation is for the industry to manage the offsetting with large scale schemes - which may be more efficient than voluntary individual consumer offsetting. The cost to the consumer can be added to the ticket price and would be mandatory. It would have to be regulated to ensure fair and equal pricing between airlines.
7. The CCC has recommended to government that UK aviation should not rely on international offsetting, notwithstanding the international aviation offsetting scheme, CORSIA, that is being implemented. This would probably mean UK aviation having to rely on UK negative carbon. In this instance voluntary consumer involvement may be necessary.

Specific DfT Questions

Q1. Do you believe that greater information provision on journeys' carbon emissions would affect consumer behaviours? Response Yes.

Would this lead to lower carbon choices? Response Yes

What evidence can you provide? Response: None specifically

Q2. *What information regarding carbon emissions do you believe consumers should be provided with?* Response: A meaningful metric based on distance travelled, mode of travel, unit carbon emissions, price of carbon and alternative travel options where there are any

How should this be provided? Response: Digitally-web for easy use at point and time of decision.

Where/when in the customer booking process should this be provided? Response: See previous response.

Do you have evidence to support your view? Response: website apps are available and offsetting is already being used. It would be helpful to know to what extent consumer offsetting is being used.

Q3. *Are travel providers already collecting information on the carbon emissions associated with journeys?* Response: Yes but it is not clear to what extent.

If so, how is this information collected and reported? Response: Not known

Does this vary across modes of transportation? Response: yes

Are they providing this information to passengers? Response: some are but statistics not known.

Q4. *To what extent are current energy use and emissions reporting and audit requirements sufficient in ensuring that travel companies have the right data to provide journey (and product) specific emissions information?* Response: Not known

Where they are not, what would be required? Response: Not Known.

Q5. *Do you agree that offsetting journeys could play a role in tackling emissions, whilst transport is decarbonised?* Response: Yes

Can you provide evidence supporting your view? Response: No

Q6. *Do you agree with the offsetting principles outlined in the 'good quality' criteria within the UK's Environmental Reporting Guidelines?* Response: Not reviewed.

Are there any further elements - for instance with respect to geographic origin, eligible project types or the date that the offset was generated - that should be included to further strengthen the environmental integrity of any future scheme? Response: The non-carbon benefits (and costs) should be taken into account and projects chosen that provide the highest marginal benefit where ever that might be but taking account of the risks.

Q7. *How should any future carbon offsetting scheme correspond with existing schemes under which carbon emissions are accounted for, or reported, such as CORSIA or the EU ETS?* Schemes should be compatible - consumer schemes are likely to be based on volunteering.

Q8. *What reporting requirements would be needed for any future scheme?* Response: Sufficient to provide meaningful incentive for the consumer to use the scheme and sufficient for a regulator to monitor individual schemes and the overall demand and use of the schemes. Market distortions and corrupt schemes must be prevented and appropriate information gathered.

How can these be designed so as to minimise additional burdens? Response: digital and co-ordinated to avoid duplication and unnecessary red tape.

Who should be in scope of requirements? Response: Unsure.

Q9. *How should any future carbon offsetting scheme be designed in order to support the objectives and requirements of the Paris Agreement, including the requirement to avoid the double counting of emission reductions?* Response: Not in a position to answer.

Q10. *What examples currently exist to offset emissions from travel at the point where tickets are purchased? Can you provide examples of where this works well and where it does not?* Response: not sufficiently reliably.

Q11. *To what extent is there a role for Government in increasing the uptake of/mandating ticket providers offering offsets?* Response: The Government should create the framework and facilitate the schemes and give legal powers to a Regulator.

Q12. *More generally, how can the proportion of consumers taking up the option to offset emissions from their travel be maximised?* Response: Marketing and promotion using private enterprise. Schemes need to be trusted. There could be a clearing house for schemes. Capital may be needed to set up schemes.

Are there any other models for offsetting that should be considered? Response: industry or company schemes (UK and international). The offsets could be traded. Bitcon might be worth considering. International-to international transfer air passengers are not beneficial in our view to the UK economy or aviation market and their carbon footprint would be better taken on board by the country from which the first leg originates.

Q13. *What role could behavioural insights have in improving the uptake of carbon offsetting options by passengers?* Response: Worth exploring.

Q14. *How could the mentioned potential issues of new carbon offsetting schemes be addressed?* Response:

Are there any other issues in implementing the provision of carbon offsetting options at the ticket sale point? Please provide evidence. Response: We are not in favour of the Government (i.e. tax payer) supporting/subsidizing offsetting.

Q15. *Do you have views or evidence on the provision of carbon emissions information for non-ticketed travel? Do you have views or evidence on offsetting non-ticketed travel?* Response: See above

Q16. *Please tell us in what context you are responding:*

e. *Other (please specify):* Campaign Group

Q17. *Please tell us about your area(s) of particular expertise. Mark all that apply in order of priority, with 1 being the highest/most important:*

- a. Buses and coaches; 4
- b. Rail passenger transport; 3
- c. Maritime passenger transport;
- d. Commercial aviation; 1
- e. Non-ticketed road transport; 2
- f. Other transport.

Q18. *If you are responding on behalf of an organisation please give us an indication of the following:*

a. The size of the organisation or, if more applicable, the number of people or companies you are responding on behalf of; 2,000

b. The main business or activity of the organisation; Response: Richmond Heathrow Campaign represents three amenity groups in the London Borough of Richmond upon Thames: The Richmond Society, The Friends of Richmond Green, and the Kew Society, which together have over 2000 members.

c. The region(s) of the UK in which your activity is predominately based (if you are active across the whole country then please answer UK'. If not based in the UK please let us know in which country you are based): West London and around Heathrow airport.

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