

Dear Sir Howard,

Having read your [speech](#) today, firstly let me congratulate you on the in depth analysis that you have carried out and the range of view points that you have considered.

My observation on your comments (in italics) follow:

1. *"We are grateful to all those who have responded and helped us in our work. Of course in some cases, at airports or in airlines, for example, one may argue that it is their job to do so. But many others, in local action groups or environmental organisations, have devoted much personal time to preparing well-considered responses to the many questions we have posed."*

After having devoted considerable time making [submissions](#) to this commission, its predecessor the [sustainable aviation consultation](#) and other [parliamentary committees](#) it is gratifying to see your acknowledgement of the efforts that concerned citizens have gone to.

I trust that with your comment you also appreciate that the dice is hugely loaded towards the large aviation corporations. From a purely logistical perspective, it is far easier for them to continue submitting to consultations such as this than it is for members of the public who have to balance the time for research and preparation with the normal day to day business of work and family life. It is also emotionally draining repeatedly explaining the severity and consequences of climate change.

But the loading of the dice is done in ways that are far more subtle and subversive towards supporting the goals of the industry. Many people are unable to comment on the climate change and environmental limitations that we inevitably face for fear of losing their job. No one in the aviation industry, oil industry, motor industry, travel industry and many others would have the courage to speak loudly against the aviation industry. To do so, would almost certainly invite dismissal.

Indeed even in education which should be the bastion of progressive thought, I have found myself in trouble with my organisation for stating the obvious in debates such as this.

The final loading of the dice against environmentalists is what they have to say is what nobody wants to hear. Governments are not elected on the basis of the closing down airports and tackling climate change, but ensuring that somehow the status quo of economic growth can be preserved despite this being impossible. For this, they have the full backing of the press. So on these matters, governments listen to industry and then conjure up large and plausible words to make it sound like they are taking climate change seriously and listening to environmentalists. I would suggest that despite your efforts, you will have taken more soundings from industry than from climate change scientists. It is hugely concerning that your speech makes no mention of the last IPCC report despite it only being published one week ago. It is equally concerning when in this country we have world leading expert centres such as the Tyndal Centre that you have not solicited information from. Prior to your next report, I would challenge your organisation to take soundings on this matter from Prof Kevin Anderson who has done considerable research on the impacts of aviation on climate change.

I trust also that you appreciate that many thinking people are now terrified about the emerging disaster of climate change, but feel powerless to act. Many of these concerned people would neither know that this commission is taking place nor feel adequately qualified to make a worthwhile submission – yet their fear of the future remains justified. This places a special onus on your commission to ensure environmental considerations are given their full weight, and not simply moved to one-side by the overwhelming response load that the aviation industry is able to muster.

2. *“Official and industry forecasts of demand for air travel have been systematically over-optimistic. Successive Department of Transport forecasts have recently been reduced, since the financial crisis and associated recession. That is partly a function of lower GDP growth, which is a strong driver of demand, but also a result of higher oil prices, which have increased the cost of flying aeroplanes.”*

In your demand forecasting paper you never acknowledged the interconnectivity of the different aspects of our economy. The financial crisis of 2008 had its roots in the rapidly increasing oil prices that burst the bubble of speculation that drives the economy. Since that date the global economy has remained on life support through a combination of quantitative easing, exceptionally low interest rates and inflation to transfer wealth from savers to borrowers. These solutions are not sustainable. Even these exceptional efforts have hardly boosted economic growth and compared with times past

the recovery is moribund. The biggest message of the 2008 crisis is that the economic system we take for granted is fundamentally flawed and the same drivers that caused the crisis haunt us still today. This persistent overhead of uncertainty is leading the US economy to the unprecedented point of a default on their bonds. As an ex-financier, I am sure that I do not need to impress on you the severity of this with its potential to blow out the water demand forecasts and availability of capital for investment.

3. *“While only 6% of UK carbon emissions today are associated with air travel, that proportion could rise sharply as other sectors reduce their emissions. If we allowed unlimited growth in air traffic, that would impose high costs on the rest of the economy if the overall target is to be met, for example, pushing up domestic heating bills as the energy sector has to decarbonise more quickly.”*

This is an interesting choice of words. 6% is a big slice of the pie, and as you point out it is set to increase.

More significantly the government's plans to decarbonise the economy are not going well. I refer you to the Government's document, [The Carbon Plan: Delivering our low carbon future](#). It is ironic that with respect to aviation it boldly states in section 35 that, *“Emissions from aviation will be capped by being part of the EU Emissions Trading System (EU ETS) from 2012, ensuring that any increases in aviation emissions are offset by reductions elsewhere in the EU economy, or internationally.”* As you are aware this will no longer be the case, but more importantly it sets the tone for repeated failures in this paper. It again boldly claims, *“New low carbon power stations – a mix of carbon capture and storage, renewables and nuclear power – will be built in the 2020s.”* Again, none of this is viable. After the Fukushima disaster has irradiated the entire Pacific nuclear power is looking less and less of an option. None of the plausible words about carbon capture and storage have been able to overcome the thermodynamic limitations inherent with its operation and today we have exactly zero carbon capture and storage projects operational in the world. Not only is the aviation industry struggling to cut its CO₂ emissions, but so is every other industry. As a result global CO₂ emissions are increasing super exponentially.

I have pointed out in past submissions the danger of this to social stability. The poorest in society will be priced out of staple energy and food due to

peak oil and climate change. The proposal of the aviation industry is that they should be able to price this weakened majority from access to further resources so that the richest minority can continue flying. This is the only outcome from the carbon trading proposals that the industry is proposing, it is fundamentally an act of aggression against society's weakest.

4. *"But none of the submissions made to us have suggested that there are transformational gains to be had. It is true that larger aircraft, like the Airbus A380, could deliver some additional capacity in terms of passenger numbers. New aircraft in each market segment are likely to be a little larger than their predecessors (as well as being quieter and more fuel-efficient). But airline fleets change slowly and the direction for travel is not all one way (for example, some new Boeing 787s may replace larger 747s)"*

This seems to be a misinterpretation of the competing strategies of the aviation industry. The A380 was built to enhance the existing the hub and spoke model of aviation by allowing higher density operation on the main routes. By contrast the initial market of the B787 was to support desire of airlines to move to a point-to-point business model. It should be noted that both of these significantly increase CO2 emissions. The A380 increases emissions by simple virtue of its size and the increased number of people that it allows in the aviation transport network, many of whom will be using connecting flights. The B787 however is potentially far worse. Its initial design was laid down in 2003/4 at a time of still relatively low oil prices. Boeing initially considered a higher speed subsonic plane but were persuaded by their customers to build an economical long haul plane suitable for point to point operations. Sustaining this mode of operation inherently requires a much bigger total fuel burn and a substantial increase in aviation business to support it. It was also a solution that the aviation industry saw to overcome potential capacity restrictions at hub airports.

Thus to say that B787 will replace B747s gives a limited picture of the strategic intent of the B787 and the potentially devastating environmental impact of moving to a point to point network.

The point to point model is much more difficult for environmental movements to counter as protests are needed at a wide range of airports. It thus incumbent for your commission to recognise that the B787 strategy is

also effectively a route for the aviation industry to circumvent environment protest and to take a harder line with the point to point model.

5. *"The best outcome [on climate change] would clearly be a global deal on aviation."*

The aviation industry have been unable to come up with anything even approaching a global deal, and given that it has failed every time it has tried, it is naivety to believe that it will suddenly start succeeding. Turkey's don't vote for Christmas and organisations with billions of pounds invested in capital equipment don't vote for contractions that will leave these idle, especially when they have huge interest payments to meet.

6. *"Growth beyond that, unless current assumptions about fuel efficiency and the use of alternative fuels prove to have been overly pessimistic, would put great pressure on the rest of the economy to achieve further carbon reductions, which could be very costly."*

As I have argued in previous submissions, assumptions about fuel efficiency and alternative fuels are already provably wrong. As planes are now almost fully optimised in terms of aerodynamics, structures and thermodynamics any further improvements will be marginal and require huge investments. For this to be recouped, huge numbers of planes need to be sold and operated negating any environmental savings.

The other thrust of the aviation industry is that they can grow their own fuel in some carbon neutral nirvana where global food shortages don't exist and plants are not needed to sequester carbon from our polluted atmosphere.

Tesco also tried this approach in 2005. In our [correspondence](#) with them where we sought their environmental justifications. They eventually admitted, *"When we decided to make biofuels available to customers in 2005, we did so in the belief that they could help customers to reduce their carbon impacts and reduce our dependency on oil as a source for petrol. Since then it has become clear that the impacts of biofuels are more complex"* before dropping their entire biofuel marketing campaign. Since then, [REDACTED] went on to warn

about the dangers biofuels impose to food security and in a [talk](#) on the issue he belatedly stated “*we should think things through before acting, so that we do not suffer from unintended consequences.*” It is therefore incredible that the aviation industry cannot be bothered to think through the consequences of their proposals, especially when the evidence is so clear all around the world.

It is a hubris that is probably more brutal than any that has gone before. Producing biofuels requires the conscious destruction of ecological resources such as tropical rainforests which are of immense value to the planet now and in the future for absolutely no scientific justification.

7. *“Our work so far suggests that doing nothing to address the capacity constraints in our current airport system would not be the right approach. Its likely effect would be to restrict passengers’ choices and it could have unintended consequences for the efficiency and resilience of UK airports, as well as possibly leading to some flights and emissions being displaced to other countries.”*

You make this comment immediately after your final summary about being receptive to the constraints of climate change and your well argued points that the best way to constrain aviation emissions is to constrain development of airports. It is quite remarkable. You have seen the evidence but your final adjudication ignores it. Perhaps you might want to explain why. It is setting a bad and dangerous omen for the future.

I thank you for your final request for comments on the analysis you have set out.

Yours sincerely