

RA 1802 – Aviation Greenhouse Gas Emissions

Rationale

Aviation activity produces greenhouse gas emissions¹ which have an adverse effect on the natural environment through their contribution to global warming. Without adequate processes and tools for managing the greenhouse gas emissions produced by aviation activity, opportunities to minimize these adverse effects may be missed. This Regulatory Article (RA) requires the greenhouse gas emissions produced by UK military registered Aircraft to be managed, focusing on carbon emissions², with the aim of limiting where reasonably practicable.

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Definitions Relevant to this RA

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Definitions

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1. **Aircraft Operator.** The person who at the relevant time has Responsibility³ for the management of the military Aircraft. This might be a Delivery Duty Holder or Accountable Manager (Military Flying).

Regulation 1802(1)

Aviation Greenhouse Gas Emissions

1802(1) Aircraft Operators of UK military registered Aircraft **shall** manage the carbon emissions produced by their Aircraft.

Acceptable Means of Compliance 1802(1)

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2. Aircraft Operators of UK military registered Aircraft **should** have a carbon emissions monitoring plan for each Aircraft fleet for which they are responsible.
3. As a minimum, a carbon emissions monitoring plan **should** include:
 - a. Version and date of document.
 - b. Details of the Aircraft Operator.
 - c. Aircraft types and number of Aircraft per type.
 - d. Fuel type used for each Aircraft type.
 - e. Procedures used to obtain the data required to monitor annual carbon emissions.
 - f. Methodology for calculating carbon emissions.
4. Carbon emissions monitoring plans **should** be updated whenever there is a change to the information related to sub-paragraphs b to f above.
5. To calculate carbon emissions from fuel type, the Government conversion factors for the reporting of greenhouse gas emissions⁴ **should** be used.
6. Aircraft Operators of UK military registered Aircraft **should** report their carbon emissions annually to the Operational Energy Authority (OEA)⁵. The submission **should** include a short narrative on how the Aircraft Operator manages the carbon emissions produced by their Aircraft, with the aim of limiting them where reasonably practicable; an explanation of any variation in the reported values from previous years submissions; alongside a copy of the carbon emissions monitoring plan.

¹ The [Climate Change Act 2008](#) defines greenhouse gases as: carbon dioxide (CO₂); methane (CH₄); nitrous oxide (N₂O); hydrofluorocarbons (HFCs); perfluorocarbons (PFCs); sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃).

² Carbon emissions include a subset of greenhouse gas emissions. In line with civil legislation and UK Government Conversion Factors, these include CO₂, CH₄ and N₂O, referred to as CO₂e (where the 'e' stands for CO₂ 'equivalent').

³ Refer to MAA 02: MAA Master Glossary.

⁴ <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>.

⁵ Via email UKStratCom-DefSp-OEA SO1 CapCoh.

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7. UK civil legislation⁶ requires civilian aviation to participate in the UK Greenhouse Gas Emissions Trading Scheme⁷, but the creation of a military scheme is considered impracticable. Aircraft Operators are instead required to have an understanding of, and limit where reasonably practicable, their Aircraft's carbon emissions and intelligently assess, via a narrative in their annual emissions report, how they manage these emissions and why the emissions may have increased or decreased from previous years.

8. Whilst the required outcomes of this RA are driven by environmental protection⁸, they also support Ministry of Defence (MOD) sustainability strategies⁹.

9. The Government conversion factors for the reporting of greenhouse gas emissions are updated annually.

10. The OEA may provide Aircraft Operators with further guidance on annual reporting requirements to ensure Standardization across all Aircraft Operators.

11. Whilst independent verification of the annually reported emissions data is not currently necessary, this may be required in the future to ensure the consistency and accuracy of the data.

⁶ [The Greenhouse Gas Emissions Trading Scheme Order 2020](#) and [The Air Navigation \(Carbon Offsetting and Reduction Scheme for International Aviation\) Order 2021](#).

⁷ Noting that some UK military Aircraft on civil taskings are also required to participate in this Scheme.

⁸ Practices and procedures that are designed to avoid, minimize, eliminate, or reverse damage to the environmental and to environmental systems.

⁹ [MOD Sustainability and Climate Change](#).