

NPA/26/16

Title of Proposal: Aviation Greenhouse Gas Emissions

RA(s) or Manual Chapter(s): RA 1802

Organizations and / or business sectors affected: Aircraft Operators across the Defence Air Environment.

RFC Serial No: MAA/RFC/2025/140, 2025/164, 2026/008

MAA Author

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MAA LegAd (if required)

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N/A	N/A	N/A	N/A

Cross-references to Other Documents or Relevant Sources

Other MRP Amendments: N/A

Service Inquiry Recommendations: N/A

AAIB Recommendations: N/A

Other Investigation Recommendations: N/A

Any Other Document: MAA/RI/2024/02 – Transitional Arrangements for the RA 1800 series concerning aviation-related Environmental Protection

Feedback Notes for the Regulated Community

The Regulated Community are invited to offer feedback about the proposed amendment in the following areas:

- Air or Flight Safety impact
- Operational impact
- Errors or omissions

- Timescale for implementation
- Cost of implementation
- Amendment to internal processes/orders
- Resourcing the outcome of change
- (Contract amendments because of the change)

The format for feedback is available within a single Excel Template file on both internal and external MAA websites; it is important to use this format to ensure that your responses are considered and answered correctly.

Summary of Proposed Amendment

Objective: Review of initial issue, implementation of RFCs, and inclusion of relevant detail contained in MAA/RI/2024/02.

Changes made:

- Rationale updated to articulate Defence obligations with respect to greenhouse gas emissions management.
- Definition of Aircraft Operator moved to MAA02 at next issue.
- Incorporated carbon emissions monitoring and reporting timelines as published in MAA/RI/2024/02.
- Reporting requirement to Operational Energy Authority (OEA) removed.
- Added requirement for Aircraft Operators of UK military registered aircraft to report annual carbon emissions, with a copy of the carbon emissions monitoring plan, to the MAA.

Impact Assessment: Minimal perceived impact to affected organisations.

Consultation Period Ends: 4 Weeks

The consultation period for this proposed amendment ends on the stated date. Please send your feedback, using the Response Form, via email to DSA-MAA-MRPEnquiries@mod.gov.uk

MAA Approval

Post	Name	Rank	Signature
DSA-MAA-Reg-Eng	Redacted	Redacted	Redacted - Original Signed

RA 1802 – Aviation Greenhouse Gas Emissions

Rationale

► **Civil aviation** ◀ Greenhouse gas emissions¹, which have an adverse effect on the natural environment, ► **are regulated by UK civil legislation**². Although Defence is disappplied from this legislation, it is obligated to achieve equivalent environmental outcomes. Without adequate management, opportunities to minimise adverse effects may be missed, and Defence may fail to meet its obligations. ◀ This Regulatory Article (RA) requires the ► **management of carbon emissions**³ from ◀ UK military registered Aircraft to ► **limit environmental impact, where practicable, and will support mandated departmental reporting**. ◀

Contents

Definitions Relevant to this RA

1802(1): Aviation Greenhouse Gas Emissions

Definitions

Definitions Relevant to this RA

1. ► This definition has been incorporated within MAA02⁴. ◀

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)

Aviation Greenhouse Gas Emissions

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 emissions⁵ **should** be used.
6. Aircraft Operators of UK military registered Aircraft **should** ► **monitor their carbon emissions annually from 1 January to 31 December and report them to the MAA⁶ by 31 March the following year**. ◀ 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, ► **and** ◀ 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 ► [The Greenhouse Gas Emissions Trading Scheme Order 2020](#) and [The Air Navigation \(Carbon Offsetting and Reduction Scheme for International Aviation\) Order 2021](#). ◀

³ 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').

⁴ ► Refer to MAA02: Military Aviation Authority Master Glossary. ◀

⁵ <https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>.

⁶ ► Email MAA Environmental Protection Desk Officer via DSA-MAA-MRPEquiries@mod.gov.uk. ◀

**Guidance
Material
1802(1)****Aviation Greenhouse Gas Emissions**

1. UK civil legislation² 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 ► understand, ◀ 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.
2. Whilst the required outcomes of this RA are driven by environmental protection⁸, ► the carbon emissions reports ◀ also support Ministry of Defence (MOD) sustainability strategies⁹.
3. The Government conversion factors for the reporting of greenhouse gas emissions are updated annually.
4. The ► MOD sustainability policy lead ◀ may provide Aircraft Operators with further guidance on annual reporting requirements to ensure Standardisation across all Aircraft Operators.
5. 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.

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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, minimise, eliminate, or reverse damage to the environmental and to environmental systems.

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