

Questions for the CAA's consultation on consumer environmental information

Why your views matter

Your views are important so that we can develop an approach that is well considered and workable, that will be of benefit to consumers and that will be deliverable by the aviation industry and other stakeholders. We will review all responses to this consultation and your views will inform the next stage of this project. This is likely to be the publication of final Principles of Aviation Consumer Environmental Information and accompanying guidance.

Responses to this consultation can be made either by the consultation on

<https://consultations.caa.co.uk/> or by email to environment@caa.co.uk.

Please tell us if you do not agree with sharing your responses with the Department for Transport for data analysis and policy development

Draft Principles of Aviation Consumer Environmental Information

We consider that the environmental information given to consumers on the emissions of their flight should follow the draft principles set out below, so that information is:

1. Accessible – environmental information should be easily accessible to all consumers wherever flights within, to or from the UK are advertised or sold.
2. Transparent – publishers of environmental data aimed at aviation consumers should publish their methodologies to ensure that it is clear how calculations have been made.
3. Accountable and accurate – publishers of environmental information are accountable for the accuracy of the calculations and for ensuring the most accurate, up to date and credible sources of input data are used.
4. Specific – environmental information should be calculated using data that is as specific as possible to the passenger's choice of flight. This means that it should be based on input data that relates specifically to the airline in question (for example, aircraft type, route, seat choice, average load factor, cargo weight proportion etc.). Where specific input data is not available, the most credible alternative data should be used. All sources of input data should be clearly referenced.
5. Timely – the environmental information should be updated regularly to reflect any operational changes that may impact any input used in environmental calculations.
6. Consistent – the same environmental information should be available wherever flights are advertised or sold. Airlines should seek to ensure that, where they publish environmental information related to a flight, that the same information is also available wherever else those flights are advertised and sold. Where third parties publish environmental information related to a flight, they should seek to ensure that it is (as a minimum) aligned with information provided by airlines.
7. Standardised – the publishers of environmental information should meet minimum standards for measuring and reporting environmental data to ensure consistency and comparability between different airlines and flight options.

8. Comparable – environmental information (when using a metric) should be shown using standard metrics – kg CO₂ or kg CO₂e per passenger journey.

9. Subject to continuous improvement – publishers of environmental information should consider how publishing that information could encourage improvements to aviation sustainability performance and build in mechanisms to measure consumer impacts of publishing this information and enable this information to form part of business improvement decisions.

Please rank from 1 (most important) to 9 (least important) (type the numbers from 1-9 in the box)

Accessible – environmental information should be easily accessible to all consumers wherever flights within, to or from the UK are advertised or sold.	1	
Transparent – publishers of environmental data aimed at aviation consumers should publish their methodologies to ensure that it is clear how calculations have been made.	7	
Accountable and accurate – publishers of environmental information are accountable for the accuracy of the calculations and for ensuring the most accurate, up to date and credible sources of input data are used.	2	
Specific – environmental information should be calculated using data that is as specific as possible to the passenger's choice of flight. This means that it should be based on input data that relates specifically to the airline in question (for example, aircraft type, route, seat choice, average load factor, cargo weight proportion etc.). Where specific input data is not available, the most credible alternative data should be used. All sources of input data should be clearly referenced.	3	
Timely – the environmental information should be updated regularly to reflect any operational changes that may impact any input used in environmental calculations.	8	
Consistent – the same environmental information should be available wherever flights are advertised or sold. Airlines should seek to ensure that, where they publish environmental information related to a flight, that the same information is also available wherever else those flights are advertised and sold. Where third parties publish environmental information related to a flight, they should seek to ensure that it is (as a minimum) aligned with information provided by airlines.	6	
Standardised – the publishers of environmental information should meet minimum standards for measuring and reporting environmental data to ensure consistency and comparability between different airlines and flight options.	4	
Comparable – environmental information (when using a metric) should be shown using standard metrics – kg CO ₂ or kg CO ₂ e per passenger journey.	5	
Subject to continuous improvement – publishers of environmental information should consider how publishing that information could encourage improvements to aviation sustainability performance and build in mechanisms to measure consumer impacts of publishing this information and enable this information to form part of business improvement decisions.	9	

Please explain the reasoning behind your ranking of the draft principles

10. To what extent, if at all, do you agree or disagree that the draft principles provide actionable guidance for airlines on data publication?

Please select only one item

- strongly agree

- agree ✓
- disagree
- strongly disagree
- don't know

Please explain your answer

11. In relation to the draft principle that information should be timely, how often do you think the data should be updated?

More information on update frequency options

Daily updates: Data is refreshed and modified on a daily basis to ensure accuracy and relevance.

Weekly updates: Information undergoes revision and updates once a week to maintain its timeliness.

Monthly updates: Data is reviewed and refreshed on a monthly schedule to keep it current.

Quarterly updates: Information is revised and updated every three months to reflect changes accurately.

Bi-annual updates: Data undergoes a review and update process twice a year to ensure it remains relevant.

Annual updates: Information is refreshed and revised once a year to maintain its accuracy and relevance.

Real-time updates: Data is constantly monitored and refreshed instantly as changes occur, ensuring the most up-to-date information.

As needed updates: Updates occur whenever significant changes happen, without a predetermined schedule, to maintain relevance.

Event-driven updates: Data is updated based on specific events or triggers, ensuring timely information delivery.

Continuous updates: Information undergoes a continuous review and update process to keep it current and relevant at all times.

Please select only one item

- daily
- weekly

- monthly
- quarterly
- bi-annual
- annual
- real-time
- as needed ✓
- event driven
- continuous

12. In relation to the draft principle that the information should be standardised, how would you define “minimum data standards” for measuring and reporting environmental data? Would the Government’s Environmental Reporting Guidelines provide an appropriate framework or can you suggest alternatives? **See response to question 13**

Government’s Environmental Reporting Guidelines

Options for implementation of the principles

13. Please rank the following options for implementation of the principles based on your preference between 1 (most preferred) to 4 (least preferred).

Option 1: The CAA publishes the principles as a guidance document, asks airlines and other organisations that sell or advertise flights to follow them and monitors uptake. This option is based on a light touch, voluntary approach.	4
Option 2: The CAA publishes the principles as a guidance document and uses its powers to gather relevant information from airlines and others, which in turn enables the CAA to assess how those organisations are conforming with them and use that information to publish a report on uptake. This reporting could be done through our existing annual reporting of the industry’s environmental performance and could also include verification of the information provided to passengers. This is our preferred option as it incentivises industry to follow the principles without creating an overly complex data gathering and reporting regime.	3
Option 3: The CAA publishes the principles as a policy decision and uses its powers to gather relevant data from airlines. The CAA would then calculate and publish average CO2e emissions for key routes only, using either an existing methodology or developing its own. This more direct approach would provide some limited baseline information to passengers which they could compare to the information provided by the airline or booking agency when searching for and booking a flight. This approach would involve detailed consideration of how that baseline information can be calculated and would require more intensive data gathering and analysis.	2
Option 4: The CAA publishes the principles as a policy decision and uses its powers to gather relevant data from airlines to calculate the carbon footprint of all individual	1

scheduled flights, using either an existing methodology or developing one itself. The CAA could then either publish the information itself and / or ask airlines to publish it with their ticketing/scheduling info. This would be a more intensive approach for both airlines and the CAA that would enable consistency of information across flights booked in the UK but may not be consistent with approaches taken elsewhere.	
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Please explain your answer - **We feel that unless the CAA enforces this and requires the airlines to publish it with their ticketing/scheduling info, passengers will not have the information they need to make an informed choice. The information should also include the per capita global carbon emissions budget so that people realise the proportion of total annual emissions they are using up. The World Economic Forum has stated that total annual 'per-capita emissions need to come down to below 5 tonnes per-capita over the next decade and move towards 2.5 tonnes by 2040. Today this works out at around 1000kg/a tonne annually for all transport per person.** [Have we reached peak greenhouse gas emissions? | World Economic Forum \(weforum.org\)](#)

1. For option 1, what is the likelihood that your organisation would participate in a consumer environmental information scheme that conformed to the principles if it were voluntary? Please answer realistically.

Please select only one item

- highly likely
- likely
- unlikely
- highly unlikely
- don't know

2. Would your organisation like to work with the CAA to pilot a consumer environmental information scheme?

Please select only one item

- **Yes**
- No
- Don't know

3. Which, if any, of the following do you think are barriers to your organisation implementing such a scheme? (Please select from the list or specify "Other"

with a brief explanation.)

Please select only one item

- technical difficulties
- access to data
- already using another system
- cost

- other **N/A**

If other, please provide a brief explanation

4. When do you think any such scheme should commence?

Please select only one item

- **2026**

- 2027

- later

Please explain your answer

5. Does your organisation currently undertake any verification for your emissions data internally?

Please select only one item

- Yes

- No

- Don't know **N/A**

If yes, please provide a brief explanation

6. To what extent do you think there is value in implementing a verification requirement for CO2 calculations for the information provided to passengers?

Please select only one item

- **A lot of value**

- Some value

- Not very much value

- No value

- Don't know

Please explain your answer

7. Should environmental information be integrated into the global distribution system alongside ticketing and scheduling information?

Please select only one item

- **Yes**

- No

- Don't know

8. Do you think that airlines or other relevant organisations should be required to

publish CO2e data or CO2?

Please select only one item

- **Yes and this should include DEFRA's recommended radiative forcing factor of 1.891.**

- No

- Don't know

Please explain your answer

9. Recognising the current scientific uncertainty, do you agree or disagree that non-CO2 emissions should be included in the calculations and verification?

Please select only one item

- **Strongly Agree**

- Agree

- Disagree

- Strongly Disagree

- Don't know

10. Is there anything else you would like to share or any additional comments you

have regarding the topics discussed in this questionnaire? **We feel there is a lack of understanding about the significant carbon emissions in relation to flying and that any savings that people make through recycling and home insulation etc. can be wiped out by one long-haul flight.**