

Annex C - Consultation response form on Emissions Cost Assessment

PART 1 - Information about you

Name	Dr. Daire Casey
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Company Name or Organisation (if applicable)	Portsmouth Climate Action Network
Please tick one box from the list below that best describes you /your company or organisation.	
<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input checked="" type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Police
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):
<p>If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members:</p> <p>Views obtained through dialogue with 12 active members</p>	
<p>If you would like your response or personal details to be treated confidentially please explain why:</p>	

PART 2 – List of questions

Question 1: Are the UK emissions inventory carbon figures from domestic and departing international flights a satisfactory indicator of the UK aviation carbon emissions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make:		

Question 2: Do you believe an uprating factor should be applied to the estimated carbon emissions to account for long-haul UK departing flights with more than one leg?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Please explain your answer: Fuelling could be scheduled for such flights specifically to avoid taxes based within the U.K. A stopover in, for example Ireland, could evade any proposed control measures.		

Question 3: Are you content that the UK emissions inventory figures for UK domestic and departing international flights provide a satisfactory indicator for total UK aviation sector activity?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If your answer is no please explain your reasons and add any additional comments you wish to make: Although the retail sector does interact with the aviation sector at airports, it would not be there if aviation had not located itself there in the first place. If the aim of the Emissions Cost Assessment is to enable Ministers to make informed decisions, they should be in possession of the full emissions data.		

Question 4: Do the proposed values for the factor for non-CO ₂ effects provide a robust way forward, recognising there are uncertainties that must be taken into account?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If your answer is no please explain your reasons: Through the impact of non-CO ₂ elements, the overall RFI is quoted as being between 2 and 4. The Tyndall centre have indicated that, because the emissions are made at height, the effect is up to 3 times that of surface-based emissions. This indicates a maximum value of 12.		

Question 5: Do the proposed values for the social cost of carbon provide a robust way forward, recognising there are uncertainties that must be taken into account?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If your answer is no please explain your reasons: The social cost of £70/ tC does not appear to take into account the globalised nature of the emissions' impact.		

Question 6: Should APD and duty collected on AVGAS be treated as contributing to the climate change costs of aviation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Please explain your answer: This money should be ring-fenced to effect better adaptation in both the local and international fora.		

Question 7: Are there any other actions, in addition to offsetting and emissions trading, taken by the aviation industry which you would regard as relevant to the emissions cost assessment?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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If yes, please give details:
 Whilst offsetting cannot be considered as a sustainable activity (more 'binge and purge'), the airlines profess to have green aircraft. The perception of the public may therefore be perverted in terms of what they view as the social cost of carbon.

Question 8: Should the emissions cost assessment be based on the most recent calendar year for which a full and consistent data set is available?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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If your answer is no please explain your reasons:
 Provided this does not constitute a particularly 'spiky' data set.

Question 9: Are there any other data sources you believe might be relevant to carrying out an emissions cost assessment?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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If yes, please give details:

Question 10: Should the assessment be carried out by the Department, or by another Government body?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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If your answer is no please explain your reasons:
 Many of the 'options' for discussion in this document are contentious and so the department cannot be viewed as being unbiased in this issue. The questions appear to be framed not in terms of "what can we afford to allow" but "what will quieten those that are concerned"

Question 11: Do you agree that the assessment should be based on Government data, such as the social cost of carbon, radiative forcing factor and emissions data, in order to ensure consistency and credibility going forward?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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If your answer is no please explain your reasons:

Question 12: Should the methodology be kept under review to take account of developments in the evidence base and policy?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
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If your answer is no please explain your reasons:

Please send this response to: ECA.Consultation@dft.gsi.gov.uk