



***Consultation: CAA and the Environment: Improving Aviation's Sustainability Now and for the Future***

***Date: 12 April 2012***

***Contact: Scott Kennerley***

***Our (PID) reference number: PD20010***

## 1. Introduction

- 1.1 The Consumer Council welcomes the opportunity to respond to the Civil Aviation Authority (CAA) consultation *CAA and the Environment: Improving Aviation's Sustainability Now and for the Future*.
- 1.2 The Consumer Council is an independent consumer organisation, working to bring about change to benefit Northern Ireland (NI) consumers. Our aim is to make the consumer voice heard and make it count.
- 1.3 We have a statutory remit to *promote and safeguard the interests* of consumers in NI and we have specific functions in relation to energy, water, transport and food<sup>1</sup>. These include considering consumer complaints and enquiries, carrying out research and educating and informing consumers<sup>2</sup>.
- 1.4 The Consumer Council is also a designated body for the purposes of supercomplaints<sup>3</sup>, which means that we can refer any consumer affairs goods and services issue to the Office of Fair Trading<sup>4</sup>, where we feel that the market may be harming consumers' best interests.
- 1.5 In taking forward our broad statutory remit we are informed by and representative of consumers in NI. We work to bring about change to benefit consumers by making their voice heard and making it count. To

---

<sup>1</sup> The Consumer Council undertakes its specific functions in relation to food recognising the role of the Food Standards Agency (FSA). The FSA has responsibility for the development of food policy and for the provision of advice, information and assistance, in respect to food safety or other interests of consumers in relation to food. Therefore, to ensure good value and use of public money, the Consumer Council and FSA have a memorandum of understanding and the Council's strategic focus on food is primarily in relation to food prices and customer experience.

<sup>2</sup> The General Consumer Council (Northern Ireland) Order 1984, 1984 No. 1822 (N.I. 12), <http://www.legislation.gov.uk/nisi/1984/1822/contents>

<sup>3</sup> The Enterprise Act 2002 (Part 9 Restrictions on Disclosure of Information) (Amendment and Specification) <http://www.legislation.gov.uk/ukxi/2003/1400/schedules/made>

<sup>4</sup> The OFT is the UK's consumer and competition authority. Its mission is to make markets work well for consumers. It is a non-ministerial government department established by statute in 1973 <http://oft.gov.uk/about-the-oft/>

represent consumers in the best way we can, we listen to them and produce robust evidence to put their priorities at the heart of all we do.

## **2. The dependence of Northern Ireland consumers on air travel**

- 2.1. Given Northern Ireland's geographic location, air travel is vitally important to the region's consumers, enabling them to access GB, Europe and further afield. In its report *Air Passenger Duty: implications for Northern Ireland*, the Northern Ireland Affairs Committee recognised "that for many people in Northern Ireland travelling by air is not a luxury, but is an essential element of family and economic life"<sup>5</sup>.
- 2.2 The high level of dependence on air travel amongst Northern Ireland consumers is highlighted by UK transport statistics. In 2011 UK airports handled<sup>6</sup> 219 million passengers<sup>7</sup>. Passengers travelling on domestic services account for 17% of all UK passenger movements. By comparison, Northern Ireland airports handled 6.9 million passengers during 2011<sup>8</sup> and passengers travelling on UK domestic services account for 75% of all Northern Ireland passenger movements. These are journeys which GB consumers are not required to make by air given they can access GB destinations by road or rail. Northern Ireland's domestic air services are therefore vital in terms of enabling mobility between NI and GB.
- 2.4. Air travel is of central importance to facilitating trade with and economic growth in Northern Ireland. Nonetheless, given environmental constraints, the Consumer Council recognises that addressing the environmental impacts of aviation is necessary if aviation is to continue to play its part in stimulating economic growth.

---

<sup>5</sup> House of Commons Northern Ireland Affairs Committee *Air Passenger Duty: implications for Northern Ireland* (July 2011).

<sup>6</sup> Civil Aviation Authority passenger statistics

<sup>7</sup> Approximately 38 million travelled to a domestic airport, approximately 115 million travelled to an EU airport and approximately 67 million travelled to a non-EU international airport.

<sup>8</sup> Approximately 5.2 million travelled to a UK airport and approximately 1.7 million travelled to a non-UK airport

2.5 The Consumer Council believes, however, that given the heavy dependence on air travel of Northern Ireland passengers, it is essential that improvements are made in the efficiency of aviation to ensure constraints are not placed on the frequency with which passenger are able to travel.

### **3. Information for passengers**

3.1 The Consumer Council welcomes the fact that the Government's draft Civil Aviation Bill will give the CAA a role in promoting better public information about airline and airport performance and about the environmental impact of aviation. It is important that consumers have relevant information based on the environmental as well as the financial cost of travel to enable them to make informed choices.

3.2 The Consumer Council wants to ensure that the sustainability agenda takes the consumer viewpoint into account. We believe also that as consumers, exercising our responsibilities is as important as exercising our rights. So, in formulating consumer focused policy we are committed to promoting responsible consumerism and encouraging consumers to change their behaviour to benefit them today and tomorrow. Our aim is to ensure consumers are provided with information, choice and value for money whilst the negative environmental impacts of the production and consumption of goods and services are minimised.

3.3 Although consumers in Northern Ireland have identified responsible consumerism and sustainable development as important issues for them<sup>9</sup> Consumer Council research<sup>10</sup> indicates that the majority of consumers have a very limited understanding of the language typically used in environmental discourse. For example, many consumers do not understand what terms such as "sustainability" mean. Information regarding the environmental performance of airlines and airports

---

<sup>9</sup> Consumer Council's Corporate Plan 2011 - 2015

<sup>10</sup> Data taken from a series of CCNI focus groups conducted in December 2010.

should therefore be communicated in simple, easily understandable terms to enable consumers to make informed decisions regarding their travel choices.

- 3.4 In developing its activity plan for information provision, the CAA should engage with a wide range of stakeholders to ensure relevant information is provided in an easily understandable manner to enable passengers to understand, assess and compare the impact of their travel choices. The Consumer Council would welcome the opportunity to participate in any such engagement exercise.
- 3.5 It is also important that the CAA consults with passengers on a regular basis to identify whether the information provided about the environmental impact of aviation is understood by passengers and to assess the impact it has in determining their travel choices.

#### **4. The European Union Emissions Trading System (ETS)**

- 4.1 The Consumer Council accepts the inclusion of aviation in the ETS on the basis that the polluter pays principle requires airlines to pay for the environmental externalities of air travel. It is essential, however, that airlines take steps, where necessary, to improve the efficiency of their aircraft to enable them to keep within their emissions allowances and avoid passing costs onto passengers. It is also essential that airlines do not use the opportunity presented by the inclusion of aviation in the ETS to increase charges levied on passengers.

#### **5. Balancing competing interests**

- 5.1 In its response to the DfT's consultation on its 2011 *Developing a sustainable framework for UK aviation: Scoping document* the Consumer Council suggested that DfT, through consultation with key stakeholders, should determine an agreed framework for evaluating competing interests. Taking the example of the need to balance the

competing interests of CO<sub>2</sub> emissions reduction versus local noise reduction the Consumer Council suggested an agreed process should allow for a full and open consideration of all issues with input from sectoral interests including the views of air passengers, residents groups, airlines, airports, business representatives, and environmental organisations. The stages for the discussion should be clearly determined and timescales for decisions outlined at the outset of the process.

- 5.2 In seeking to understand the trade-offs between environmental impacts, for example, local noise and global climate change effects, the Consumer Council recommends the CAA follows the approach outlined above to ensure the various competing interests are balanced in its environmental policy.

## **6. Further Information**

- 6.1 For more information or to arrange a meeting to discuss any of the policy positions outlined in this paper please contact Scott Kennerley, Head of Transport, on 028 9067 2488 or [skennerley@consumercouncil.org.uk](mailto:skennerley@consumercouncil.org.uk).



**The Consumer Council**



# ***Making the consumer voice heard and making it count***

Elizabeth House  
116 Holywood Road  
Belfast  
BT4 1NY

Telephone: 0800 121 6022  
Textphone: 028 9067 2488  
Fax: 028 9065 7701  
E-mail: [info@consumercouncil.org.uk](mailto:info@consumercouncil.org.uk)  
Website: [www.consumercouncil.org.uk](http://www.consumercouncil.org.uk)