

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Bywyd Gwyllt y Byd (WWF) & Aviation Environment Federation	Response from World Wildlife Fund (WWF) & Aviation Environment Federation
EB 01	EB 01





WWF-UK
Registered office
The Living Planet Centre
Rufford House, Brewery Road
Woking, Surrey GU21 4LL

Tel: +44 (0)1483 426444
info@wwf.org.uk
wwf.org.uk

Joint response from WWF-UK and the Aviation Environment Federation to the Consultation on the Environment (Wales) Bill

Aviation Environment Federation
Registered office
2nd Floor, 40 Bermondsey Street, London SE1 3UD

Tel: +44 (0)20 3102 1509
info@aef.org.uk
aef.org.uk

10 June 2015

WWF-UK and the Aviation Environment Federation (AEF) are pleased to submit this response to the Environment and Sustainability Committee's Consultation on the Environment (Wales) Bill.

This response focuses solely on the inclusion of emissions from international aviation and shipping (IAS) in the 2050 climate change targets (Part 2 Question 4). WWF-UK and AEF have jointly advised WWF-Cymru on this issue and an edited version of this response is included in WWF-Cymru's response to the Consultation, which is much broader in its scope than this response. WWF-UK and AEF have decided to submit this response separately in order to go into more detail on the specific issue of the inclusion of IAS emissions in the 2050 climate change targets.

Part 2: Climate change. What are your views on what emissions should be included in targets? All Welsh emissions or those within devolved competence?

1. The Welsh Government has an opportunity to show leadership in the UK and internationally by formally including emissions from international aviation and shipping (IAS) in its climate change targets from the outset. However, the current draft of the Environment Bill instead opts to go down the same route as the UK Climate Change Act, which continues to duck the question of IAS emissions [1].
2. The UK still does not formally account for IAS, although Scotland has accounted for IAS since 2010. Scotland has devised its own simple formula for aviation based on departing flights, easily replicable in Wales, and drawn on conventional accounting practices for shipping [2]. The UK government is waiting for clarity on the international climate change framework for aviation, and the only reason it has not acted on shipping is a preference "to maintain a consistent approach to both international sectors" [3]. In the meantime, because it is clear that IAS must be included in the long term 80% emissions reduction that the Act delivers, the UK's carbon budgets for other sectors have been tightened such as to allow 'headroom' for including IAS as soon as the methodological issues are resolved. Formal inclusion will not, therefore, result in a significant change to the carbon budgets for other sectors.



President: His Royal Highness,
The Prince of Wales KG, KT, GCB, OM
Chair: Sir Andrew Cahn KCMG
Chief Executive: David Nussbaum

WWF-UK a charity registered in England and Wales number 1081247 and in Scotland number SC039593, a company limited by guarantee registered in England number 4016725. VAT number 733 761821
100% recycled paper

3. The international climate change framework for aviation depends on the market based measure (MBM) for regulating CO₂ from international flights currently under development in the International Civil Aviation Organisation (ICAO). ICAO is expected to agree key elements of the MBM at its next Assembly in autumn 2016 [4], and to introduce the MBM in 2020. After the Assembly, the EU will need to decide whether and how to adjust the scope of the EU Emissions Trading System for regulating international flights to or from destinations within the EU [5].
4. We recommend that the Welsh government formally include IAS in its targets from the outset, using similar formulae to those adopted by the Scottish government, with a view to reviewing the formulae as soon as clarity on the international climate change framework for aviation is achieved. This will enable policymakers and stakeholders to have complete information about IAS and make decisions about these sectors that are fully consistent with the objectives of the Environment Bill. It will also underline the importance of fully accounting for IAS in long term emissions targets without imposing any restrictions on Welsh aviation that are not in practice imposed on English and Scottish aviation sectors. By including IAS from day one, the Environment Bill will become the first piece of climate legislation operative in the UK to have complete integrity and credibility on international transport emissions from the outset.

References

1. UK Government: Climate Change Act 2008.
http://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf
2. Scottish Government: The Climate Change (International Aviation and Shipping) (Scotland) Order 2010.
http://www.legislation.gov.uk/ssi/2010/218/pdfs/ssi_20100218_en.pdf
3. DECC: International aviation and shipping emissions and the UK's carbon budgets and 2050 target (2012).
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65686/7334-int-aviation-shipping-emissions-carb-budg.pdf
4. ICAO: Resolutions adopted by the Assembly (2013).
http://www.icao.int/Meetings/a38/Documents/Resolutions/a38_res_prov_en.pdf
5. European Commission: Reducing emissions from aviation (accessed 2015).
http://ec.europa.eu/clima/policies/transport/aviation/index_en.htm

Contacts

WWF-UK	James Beard: jbeard@wwf.org.uk / 01483 412 382
AEF	Cait Hewitt: cait@aef.org.uk / 020 3102 1509
Date	10 June 2015

1961-2013: Over 50 years of conservation. WWF works in over a hundred countries to safeguard the natural world so that people and nature thrive.

AEF is the principal UK NGO campaigning exclusively on the environmental impacts of aviation and promoting a sustainable future for the sector.