

FACC Questions – June 2023

Geoff Marks -FARA asked the following question:

This following statement by Simon Geer features in the UKACC bulletin circulated to members on 2nd June.

“Farnborough is an essential part of the nation’s airport and aviation infrastructure, so it is vital that we help to free up capacity at the major airports and support the growth of UK business aviation and the economy,”

I would be grateful if Simon would address the following question:

Has the government, together with the operators of the designated airports, confirmed that Farnborough must play these roles, and if so, can it be achieved within the current movement ceiling?

Simon Geere- Said -The statement was his own opinion; current government policy is to put to best use the present aviation infra structure. There is nothing in the policy which specifically mentions Farnborough Airport.

Geoff Marks then asked a question on behalf of Hugh Sheppard CPRE Hampshire.

Dear FACC Administrator,

Please kindly accept this preamble and question under Item 10.

'After discussion of a question from me at the last meeting on carbon emissions, the FACC Chairman said 'this would have to be discussed in the future and the FACC would have to keep working on it'. Since then, there has been an email exchange between me and the FAL CEO Simon Geere, copied to the FACC.

With the agreement of FAL, please could this correspondence be made available to all FACC Members - either on request or with the minutes of this meeting - so that the key points of agreement and interest could be more widely known.

In particular, the FACC may wish to note that in his response of 13 June 2023 Mr. Geere said:

'WE DO NOT THINK THE EMISSIONS PER PASSENGER METRIC IS AN APPROPRIATE MEASURE FOR PERFORMANCE MANAGEMENT. WE ABSOLUTELY BELIEVE IN PERFORMANCE MANAGEMENT HOWEVER WE BELIEVE THE EMISSIONS PER FLOWN TONNE IS THE MOST APPROPRIATE MEASURE'

Question:

Given that Dept for Business, Energy and Industrial Strategy and now Dept for Energy Security and Net Zero publishes annualised data for the contribution in kilogrammes to climate change emissions per passenger per journey kilometre, as a metric already in place for the scheduled commercial aviation sector, does the FACC membership take the view that such a metric should be similarly applied to the private Business Aviation sector of GA? Or do the FACC

members agree with FAL that the weight of aircraft is more appropriate, thereby ignoring passenger numbers?'

By copy: in my absence, would Geoff Marks please represent this question on my behalf if necessary.

With all regards

Hugh Sheppard - CPRE

Email correspondence mentioned above:

From: Simon Geere
Sent: Tuesday, June 13, 2023 4:58 PM
To: Hugh Sheppard
Cc: FACC
Subject: RE: EXT: Re: EXT: Re: EXT: FAL and Business Aviation Emissions

Thanks Hugh, all noted. Simon

From: Hugh Sheppard
Sent: 13 June 2023 16:45
To: Simon Geere
Cc: FACC
Subject: EXT: Re: EXT: Re: EXT: FAL and Business Aviation Emissions

Dear Simon,

Finality in such a debate is elusive, but I've sought to clarify my position too. [In Blue].

You may know that while not an FACC Member, I've been attending the public meetings for 12 years and more. However, a personal commitment means I shall miss that of the 22nd.

I'll try to be constructive in putting a question forward nonetheless, so that this exchange might be brought forward into the FACC's public record and incorporated into priorities.

With thanks and all regards

Hugh

On 13/06/2023 08:45, Simon Geere wrote:

Thanks Hugh, for spending the time to respond.

Given you are wishing to share our dialogue, please find below some final points of accuracy for the record.

Simon

From: Hugh Sheppard

Sent: 12 June 2023 21:01
To: Simon Geere
Cc: FACC
Subject: EXT: Re: EXT: FAL and Business Aviation Emissions

Dear Simon,

Thank you for your welcome email of 31st May 2023. It warranted an earlier reply, but rushing it could have appeared trite.

Please put any indication of my general attitude to FAL's parent group as down to experience of the banking arm when in Australia and of its venture into the infrastructure of British broadcasting some 20 years ago.

Taking your points:

On the Home Office consultation, I'm glad that the FACC's understanding that FAL did not intend to reply has been rescinded [WE NEVER SAID WE DID NOT INTEND TO REPLY, SO NOTHING HAS BEEN RESCINDED], * My words related to the FACC 's understanding as in an email* although am at a loss as to why the topic was not felt to be of interest to the membership. It still seems to me that any national record embodying greater transparency as to how many BA (Business Aviation) travellers and to where would help to establish a metric that would encourage individual responsibility on the part of your customers, just as is now readily available to those who contribute to scheduled service emissions. To allege that such transparency could lead to BA being absorbed into scheduled operations is far-fetched and does FAL's notional endorsement of Net Zero no favours. [I HAVE NOT MADE THIS ALLEGATION AND I AM UNCLEAR WHAT YOU ARE SAYING] * Your words were: *If it [emissions per passenger] was the answer, then FAB would simply seek to become a commercial passenger airport...**

While you are '*not against some form of emissions per passenger reporting*', you are against any '*performance management*' [THIS IS NOT WHAT I SAID, I SAID WE DO NOT THINK THE EMISSIONS PER PASSENGER METRIC IS AN APPROPRIATE MEASURE FOR PERFORMANCE MANAGEMENT. WE ABSOLUTELY BELIEVE IN PERFORMANCE MANAGEMENT HOWEVER WE BELIEVE THE EMISSIONS PER FLOWN TONNE IS THE MOST APPROPRIATE MEASURE] * mea culpa, you had said you were '*against it being used for any performance management*'.* – which I don't understand – and you then query the objective as being 'merely' about transparency. Yes, of course it is, with nothing mere about establishing parameters for a readily understandable comparison of data. No doubt you are right about scheduled flights where premium passengers fund the capacity for leisure passengers at lower cost [I AM GLAD WE CAN AGREE THIS PRINCIPLE, IT IS AN IMPORTANT CONSIDERATION WHEN WE TALK ABOUT TRANSPARENCY AND COMPARISONS],* we're on song.* but on the 'polluter pays' principle, wouldn't integrity serve us all better than greenwash? Instead, the industry would like us all to believe that BA travellers fly pen-in-hand to safeguard the nation's GDP while, without the support data, it is unable to deny that they are more likely to be either on a long distance commute or leisure bound. [HAPPY TO DISAGREE ON THIS. THE ECONOMIC BENEFIT OF BA IS VERY WELL-ESTABLISHED. THE INDUSTRY SIMPLY WOULD NOT EXIST IF IT WASN'T FOR THE ECONOMIC NEED FROM BUSINESS, AS SUCH WE ARE A VERY SMALL AND SPECIALISED SUBSET OF THE WIDER BUSINESS TRAVEL MARKET] * Yes, but in the absence of data, other than the BA congestion recorded on Bank Holidays etc. the business/leisure balance inevitably raise its head.*

Maybe with improvements in decarbonisation and more open recognition of the business/leisure divide, the day might dawn when FAL customers are proud of their contribution to funding research into new means of propulsion, instead of relying on privacy to hide from the realities of climate change. The above would be in step with your wish to change industry from within, hastening worthwhile benefits from the development of new technologies.

As to whether SAF is at a dead end, do take that up with Finlay Asher, the speaker booked for the FACC meeting on 22 June. When I heard him late last year, he set out why SAF is essentially an oxymoron given its limited bearing on decarbonising the sector. To my mind, there should be '*no aviation expansion without decarbonisation*', for which the tangible ideas you say you would welcome require a more inspired lead from FAL than being one of 255 sponsors for the Freedom Flight Prize, albeit an honourable venture initiated outside the aviation industry. FAL could do better than that, perhaps with a well-publicised venture on the lines I had suggested and some real investment to which your customers could contribute. My guess is they would be more likely to participate if FAL played its part in establishing a benchmark for BA's per passenger emissions, against which to show proven and potential improvements towards Net Zero.

In following the progress of the PIR Consultation I have noted FAL's assessment of Fuel and CO2 emissions data, but see no reason to resile from the 10 times per head and more that business-jet emissions continue to represent. Only this weekend, the ongoing role of SAFs was again raised in the Observer, recalling something about the wood and the trees.

See: <https://www.theguardian.com/business/2023/jun/10/airlines-hope-that-sustainable-fuels-will-propel-them-to-a-guilt-free-future>

Thank you for the consideration shown in this exchange, for which I will seek FACC's circulation to its members in – shall I say – the interest of transparency.

With all regards

Hugh

On 31/05/2023 13:54, Simon Geere wrote:

Dear Hugh,

I understand that you have concerns around emissions and that you feel FAL does not do enough to report or mitigate the issue, however I do take exception to your accusation of corporate camouflage and refute your reference to the Macquarie Group in this regard. On the points you raise however:

1. I can confirm that FAL is providing a response to the Home Office's consultation on 'Advance information requirements for international General Aviation flights'. Just for your information, FAL is already compliant with all Home Office requirements in this regard and the consultation it is really directed at smaller airfields where the data isn't necessary provided or made available in the format the Home Office requires. You seem to believe this will result in your quest for CO2 emissions per passenger per km to be more readily available, I do not think this will be the case.

You and I disagree on the best metric for managing emissions performance at FAB, and emissions per passenger is not the answer. If it was, then FAB would simply seek to become a commercial passenger airport, producing significantly more emissions in the process (e.g. from larger aircraft, etc) and generating a much higher level of emissions outside of its direct control (e.g. from exponentially higher volumes of passengers driving in cars to FAB to get on commercial flights). Let's remember, FAB has specific planning constraints imposed upon it which means it can only handle certain types of aircraft for certain purposes. These planning constraints were there to minimise the environment impact of its operation; however, a consequential outcome of these environmental constraints is that we have a comparatively low number of passengers per flight. It now seems at odds to want to advocate a metric which encourages the removal of these constraints.

2. To be completely honest, I am not against some form of emissions per passenger reporting, I am just against it being used for performance management. So I have to ask myself what is the objective? If it is merely an argument around transparency, then let's have an open discussion around the relative impact of business travel on a private jet versus a full-service scheduled airline. Many full-service scheduled flights exist solely to satisfy the demand from the premium-paying business traveller (this is very much the case for flights from/to Heathrow for example), the fact that the majority of these flights are then 'back-filled' with discretionary leisure passengers at marginal cost (as these airlines try to compete with the low-cost airline sector), only distorts the data. I suspect the difference in the 'emissions per business traveller' metric between the two is not as great as is often perceived. The argument then comes down to the 'need' for business travel and I am pretty confident on the economic case for business travel, in particular for FAB's customers. And before you challenge my assumptions, I am not saying all FAB's customers travel purely for business reasons, but what I am saying is that a traditional scheduled airline's profitability and thus its size, scale and emissions footprint, is primarily driven by the demand from its premium fare paying passengers.
3. I don't agree that SAF is at a dead end, as that is a significant stepping stone to the future. Also, there is still a lot of benefit that can be derived from aircraft and engine design. The frustrations I see from activists and campaigners is generally around the speed of change, which I can understand but we also need to recognise that for investment to happen, for change to happen, then we also need an industry that has confidence in its future. It is conveniently naïve to be dismissive of the role of business aviation, to argue for tighter regulation to control activity, and fight the emissions challenge that way. But the winning solution is one where the industry changes from within, where the economic growth and employment benefits of business aviation go hand-in-hand with the development of new aircraft technologies, where business aviation and FAB become 'change agents' for the wider aviation industry. You touched on some of this in your email, which I like.
4. On your concept of Farnborough Foundation for Emission-free Flight, I also like this very much. You may not know but we are aligned with the Freedom Flight Prize, see the attached link. [Freedom Flight Prize](#). Also we are doing a lot of work around the impact of eVTOL here at Farnborough with our partners Vertical Aerospace [Vertical Aerospace \(vertical-aerospace.com\)](#). If you have some other tangible ideas then we would love to hear them. I certainly agree that FAB can be a catalyst for change within our sector, that has always been my ambition.

I hope these responses are helpful and perhaps we have narrowed the gap a little on how we see the future. It may surprise you but I value being constructively challenged on what we do here at FAB, and you are right that we are in a prestigious position. We may disagree on the detail and timescales, but we can both agree on the need to embrace future change.

Simon Geere

Chief Executive - Farnborough Airport

From: Hugh Sheppard

Sent: 30 May 2023 12:22

To: Simon Geere

Cc: FACC

Subject: EXT: FAL and Business Aviation Emissions

Dear Simon Geere,

Re. FAL and Business Aviation emissions.

After the discussion at the FACC meeting of 9th February, government and the media have put more to do with private in-flight emissions into public domain.

Further to the draft meeting Minutes, you may know that while the chairman is reported as *'saying this would have to be discussed in the future and the FACC would have to keep working on it'*, he did not agree with my wish to table this as an Action Point arising. As he accepts the FACC should 'keep working on it', I intend to raise the matter again at the meeting on 22nd June.

In the meantime, a new Home Office Consultation on 'Advance information requirements for international General Aviation flights' has begun, on which FAL is no doubt expected to respond. However, as far as I know, the FACC is not informing Members, although the closing date of 16th June is before its next Meeting. While this may not bear directly on emissions, the Minister's Foreword points out that current passenger Information for GA flights *'does not have to be submitted in a consistent format...'*; i.e.. in the same way as data for journeys on scheduled services, which in turn helps to facilitate published government reports of CO2 emissions per passenger per km.

The DfT also published a report on 18th May 2023 on Decarbonising General Aviation as an outcome of having commissioned a paper of September 2022 on: 'Understanding the Carbon Footprint of General Aviation'. No doubt you are familiar with this too, although as yet responses are not invited.

The point I wish to make is that the corporate camouflage of the Macquarie Group over FAL's contribution to climate change is about to be rendered more transparent on behalf of UK government which, as with international action such as in France, together with media reports as in the Times and elsewhere, is mainly due to environmental interest groups and individuals.

Yet from the prestigious position of operating at the home of UK Aviation, FAL has a heritage to turn to advantage. With aviation expansion set back until emissions are radically reduced

and sustainable fuels at a dead end, the future inevitably lies in alternative propulsion technology. Therein lies an opportunity tailored to FAL. For example, tying investment and its name to a *Farnborough Foundation for Emission-free Flight* would help associate its Business Aviation role with that of a benefactor for decarbonising the whole industry.

The exploitation of electric, hydrogen and other alternative sources, initially for small scale, private use, would be better suited to Farnborough's airport, its local authority and the local infrastructure than almost anywhere else.

While I will press on with environmental concerns, I hope that this email will encourage you to recognise that the public interest – and the FACC - could be on FAL's side, if only FAL would go about global pollution in a positive way. This email is sent on my personal account and not at the instigation of CPRE Hampshire or the AEF of which I am a member.

With all regards

Hugh Sheppard

This was a question to the General Committee:

Members responded – Both methods of measurement are valid and there is merit in both being applied to FAL.

The argument contradicts the already very detailed controls and measurement mechanisms applied through the Section 106.

This is not an issue for this Committee to judge, it is for government to decide and apply the most appropriate measurements and metrics.

James Radley – Noted both Hart and Rushmoor have declared a climate emergency it would be germane to our approach to any future growth plans at Farnborough Airport to question the carbon emissions of business aviation in terms of passenger miles flown.

Jules Crossley – Asked why are so many lights are on in the evening after the Airport has closed? This will cause light-pollution.

Les Freer – Asked where these were and if Jules could possibly send over a photo?

Gareth Saunders – Asked if Colin Shearn could make comment on the DfT commissioned study by Frazer-Nash into the decarbonisation of General Aviation in the UK.

Colin Shearn pointed out that FAL had not responded to the study, it contained a number of erroneous data sets which make it meaningless. The CAA Policy Committee will review the study but it is not something FAL can refer to or use for comparison.

A question from Colin Shearn on behalf of Farnborough Noise Group.

I draw your attention to the CAA's guidance:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/269527/air-navigation-guidance.pdf).

Annex B 9.b states:

b. where such changes might have a significant effect on the level or distribution of noise and emissions in the vicinity of a civil aerodrome, ensure that the manager of the aerodrome, users of it, any local authority in the neighbourhood of the aerodrome and any other organisation representing the interests of persons in the locality, have been consulted (which might be undertaken through the consultative committee for the aerodrome where one exists);

I would argue that the FACC has not been compliant with this as Farnborough Noise Group has not been consulted and ask how it will be addressed.

Colin Shearn

The Chairman – Responded that the make-up of the FACC was diverse and representative of the community. It has county councillors, town councillors, parish councillors and members representing a number of local interest groups. Only last year, the Committee was expanded to allow Blackwater Valley Friends of the Earth to join. The whole purpose of the FACC is consultation and he disputed the allegation the Committee was not representative.

Colin Shearn – Agreed the FACC is representative but it has not engaged.

Jules Crossley – feels there is a lack of technical expertise to support Members and their communities. The Members also need to look at more ways to communicate with Stakeholders.

Geoff Marks – Feels there is a pocket of ‘expertise’ in Churt that could be used by the FACC.

The Chairman – remind the Committee of the recent DfT consultation on Consultative Committees that recommended independent technical support for members. Who would pay?

A discussion followed – Members generally thought that technical advice would be a benefit, it would be seldom required and should be independent.

James Radley – Thought an expert would seldom be required and that if this skill could be found in the community, that could be an alternative.

A motion was suggested to invite the Farnborough Noise Group to the next general meeting and ask it to demonstrate its credentials. This was agreed by the Committee.

A personal question was then made by Colin Shearn.

Too many people are being overflown by general aviation causing noise and nuisance. Does NATS control these flights and can these aircraft be directed to fly over other less congested areas?

Rachel Thomas – These are aircraft flying VFR (visual flight rules). They do communicate with NATS to transit through controlled airspace. The instructions they are given are mandatory and will be based on what the pilot requests and the general situation at the time. The instructions

allow for flexibility so that the pilot can manoeuvre to conform to the requirements of flying VFR. The process undertaken around Farnborough is no different to that taken in other areas.

The PIR contains information on GA operations. We await the CAA response to the PIR