

Aviation White Paper Terms of Reference Submission

Rick Walters, Infrastructure Sustainability specialist



My Background

I am an infrastructure sustainability professional with more than 30 years experience in Australia and overseas. I was a founder of the Infrastructure Sustainability Council (of Australia) and am currently the Chief of Standards and Innovation at GRESB, the global ESG benchmark for real assets (real estate and infrastructure). I have extensive experience working with all infrastructure sectors including airports. I am well placed to make a submission to the consultation on the terms of reference for the Australian Aviation White Paper and hope that my submission is well received.

Why make a submission?

Aviation connects people and is fundamental to the world economy, but it is responsible for around 3% of global carbon dioxide emissions. This is likely to triple and rise to 22% by 2050, as more people fly and other sectors decarbonize more quickly. But if the world is to limit global heating to 1.5C, it needs to have hit net zero CO₂ emissions by this time. Aviation is considered a hard-to-abate sector due to long lifespan of the airplanes and cost of the solutions ([Shell](#)). This provides even more reason to focus on decarbonising the sector. We will simply not be able to reach net zero globally without it.

Elephant in the room

The “elephant in the room” is behavioural change - reducing demand through remote working and modal shift. The aviation industry acknowledges that this is a valid decarbonisation option, yet it dismisses its significance by stating that “Any behavioural change likely to be outpaced by overall population and economic growth” ([Shell](#)). But compared to all of the other options, this is the most feasible because it uses existing technologies such as ending airport expansions and reducing corporate travel ([Transport and Environment](#)). It should not be dismissed “out of hand” by the vested interests of industry incumbents.

The industry itself highlights a “reluctance to pay for reducing emissions as a critical barrier that must be overcome” ([Shell](#)). This is a clear market failure where governments must step in. It is therefore recommended that two additional terms of reference scope items be added as follows:

1. “how to change people’s behaviour to reduce travel demand (e.g. remote working) and to favour more sustainable transport modes for passengers and freight (e.g. rail)”
2. “how to consider and modify the role of the aviation sector within the overall transport system, to provide more sustainable transport options (e.g. [rail](#)), and achieve net zero for the overall transport system before 2050”

Although elements of these scope items might be argued to be outside of the scope of the aviation sector, they are absolutely essential to the decarbonisation task, and therefore must be included.

Further, sustainability and overall decarbonisation of *transport and the economy* must be an overriding objective of the white paper. This necessarily means reducing the role for aviation in the transport system of the future.

Contrails

While aviation accounts for about 3% of global CO2 emissions, its warming impact is actually far larger owing to the other gases and particulates it emits at high altitudes. Often collectively called “non-CO2” impacts, these include nitrogen oxides and contrail clouds. These are rarely touched upon in aviation climate goals, but they could be tripling the climate impacts of aviation compared with CO2 alone ([EASA](#)). This impact must be considered when it comes to “achieving net zero carbon emissions”.

Policies

Policies can be an effective tool to support decarbonisation, e.g. through inclusion of aviation emissions in the safeguard mechanism, bans on short flights ([The Guardian](#)), taxes ([IEA](#) - passing on costs to customers can help curb demand growth, while revenues generated could be used to foster low-carbon innovation and address potential economic hardship faced by airlines) and frequent flyer levies ([NEF](#)), however they are only mentioned in the scope in relation to “to encourage uptake and manufacturing of new, more efficient, transport technologies”. It is recommended to change the second scope dot point to “how to maximise the aviation sector’s contribution to achieving net zero carbon emissions including through sustainable aviation fuel, emerging technologies *and policy changes*.”

Please consider my recommendations seriously. I am sure that they will be echoed by others.

Best regards,

Rick Walters