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Aviation White Paper Branch
Domestic Aviation & Reform Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Aviation White Paper Branch,

FLIGHT FREE AUSTRALIA

📞 **0448 654 731**
www.flightfree.net.au
Facebook: @FlightFreeAustralia
contact@flightfree.net.au

Aviation White Paper Terms of Reference Consultation

The announcement of the Aviation White Paper is extremely welcome as it provides the opportunity to chart a course for the industry to 2050 and address serious and urgent challenges it faces. The terms of reference are considered and well-crafted; this brief response will focus on two pressing and related challenges facing aviation and the world and which appear only implicitly or lightly included currently:
1) contributing to the need to rapidly reduce carbon emissions, and
2) long-term job security.

Aviation and Climate Objectives

Australia has committed to achieve net zero emissions by 2050 and every sector, including aviation, must contribute to that objective. However, we emphasise the importance of the next seven years to 2030 by which time emissions must be halved to stay within the IPCC's reasonable budget for 1.5°C, preventing global heating beyond safe levels. We support the inclusion of sustainability high in the terms of reference, and we have recommendations to more clearly define the scope of enquiry:

•   Australian greenhouse gas emissions from aviation need fixed target limits for direct emissions in order to monitor progress on a five-yearly basis. These should account for their full climate forcing, including non-CO2 effects[1].

•   We are reassured to see that the terms of reference do not indicate a reliance on carbon markets or offsets to indirectly (and often ineffectively) reduce the carbon emissions of air traffic. Offsets cannot be relied upon[2] and should not form part of a serious strategy for climate impact abatement for aviation.

•   We suggest that focusing exclusively on alternative fuels, "emerging technologies", and new transport technologies is limiting and high risk. These options have potential to reduce some emissions but it is not clear that they will deliver the emissions savings or the scale required in the timescales we face before 2050.

•   A growing body of research indicates that regulatory or fiscal interventions to control demand ('demand management') for air travel will be required in order to achieve net zero by 2050[3]. We suggest that consideration of instruments for demand management should be included in the White Paper along with how and when they would be deployed. Feasibility studies for these instruments should be initiated.

1   Lee et al. (2020) https://www.sciencedirect.com/science/article/pii/S1352231020305689

2   Greenfield (2023) https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-verra-aoe

3   Bergero et al. (2023) https://www.nature.com/articles/s41893-022-01046-9; IEA (2022) https://www.iea.org/reports/world-energy-outlook-2022-an-updated-roadmap-to-net-zero-emissions-by-2050

- We recommend that consideration of the climate contribution of aviation and Australia's actions to reduce emissions include all forms, including, but not limited to, commercial, general, and military activity, domestically, regionally and internationally.

- The White Paper should include consideration of the unbalanced use of and access to aviation by different economic and social groups, and therefore their differentiated contribution to the resulting greenhouse gas emissions from air traffic[4].

Long-term Job Security

The need to reduce greenhouse gas emissions and the limited current promise of potential solutions within the necessary timeframe presents a challenge to the growth, or even maintenance, of activity levels in the aviation industry. At the same time, failing to meet climate objectives is a real threat to the aviation sector, presenting a risk of a crash and widespread job loss. Early introduction of change and policy to reduce climate impacts will not only reduce emissions, but will avoid stranded investment or the creation of jobs with no future, ensuring longer-term job security. Workers in the oil and gas sector are calling for investment in training and support for career changes[5], and aviation workers are beginning to do the same[6]. Australia has an obligation both to meet climate goals that limit warming to 2ºC but also to ensure that aviation professionals are prepared for transitioning sectors if required. We suggest that

- Inclusion of skills and training requirements is a strength of the proposed terms of reference.

- To this, add a scoping exercise for transferable skills and potential recipient sectors.

- Consideration of allocation of responsibility between the private and public sectors for providing this support be given, with mechanisms to guarantee provision and, if necessary, enforcement.

Yours sincerely,
Mark Carter

for Flight Free Australia
m: 0419 034 567
e: mcarter@flightfree.net.au

4. Gossling & Lyle (2021) https://www.tandfonline.com/doi/full/10.1080/01441647.2021.1938284

5. https://www.dw.com/en/uk-oil-and-gas-workers-push-for-clean-energy-transition/a-64909481

6. Safe Landing https://safe-landing.org/