

CAA Environmental and Sustainability Panel – Meeting minutes - DRAFT

10:30 – 16:30 01 November 2023

Attendees

Ruth Mallors-Ray (RMR)
Anil Namdeo (AN) (*via Teams*)
Charlotte Clark (CC)
Chikage Miyoshi (CM)
David Lee (DL)
Mark Westwood (MW)
Martin Hawley (MH)
Chris Page (CP)
Tomos Joyce (TJ)
Nic Stevenson (NS)
Abigail Grenfell (AG)
Bronwyn Fraser (BF)
Alison Harris

Panel Chair

CAA, (Item 2)
CAA, (Item 4)
CAA
CAA
CAA, Secretariat
CAA, Panel Support

Apologies

Alistair Lewis (AL)

1. Welcome and Administration

1.1 The Minutes from the previous meeting were approved.

2. CAA Update on Environmental Sustainability Strategy, implementation and development and update on wider CAA Strategy Development

2.1 NS updated that there are now the two interim Heads for the Safety and Airspace Regulation Group now that Rob Bishton has been appointed as CEO.

Environment Act 2021

2.2 The CAA's Office of the General Counsel (OGC) have developed a briefing to set out the CAA's responsibilities under the Environment Act 2021 (the Act), following a request from the Secretary of State for the CAA to have due regard to the Environmental Principles Policy statement contained within the Act when providing advice to the Department for Transport (DfT). AG noted that, while the CAA and DfT are still working to understand the implications of the Act and how it sits alongside the CAA's prioritisation principle set out in its Environmental Sustainability Strategy, the CAA expects to seek advice from the Panel around these new responsibilities.

2.3 The Panel noted their concerns at the impacts of the likely increase in environmental workload for the CAA, when there are already capacity constraints. The Panel advised the CAA to keep a broad, strategic focus on the implications of the Act given the likely high expectations it will have for action by the CAA.

Sustainable Aviation Fuel (SAF)

2.4 Concerns were noted that the Government's ambition and strategy did not feel well matched, for example, around having five new SAF plants under construction by 2025, and questioned whether this could be called out by stakeholders across the aviation sector.

2.5 The Panel discussed the CAA's potential role in SAF. The Panel noted that fuel standards are owned by ASTM and Def-Stan, with SAF being technologically safe to use as a drop in fuel, so there is no

obvious regulatory role for the CAA other than as an informed observer. The Panel advised that the CAA needs to be clear on its role in SAF standards as the regulatory responsibilities may not be widely understood.

- 2.6 AG noted that the CAA has a role in granting a permit to fly for the upcoming Virgin Atlantic 100% SAF transatlantic flight. NB post meeting the grant has been approved for this flight and the flight has been successfully completed.
- 2.7 CC noted she is working on several SAF projects, including economic incentives needed to attract investors and palm oil SAF which is banned by Europe. RMR noted that the EU brought in [new legislation](#) regarding sustainable deforestation.

Refresh of the CAA Strategy

- 2.8 The CAA sought the Panel's feedback on its proposed Strategy refresh, noting it is being refreshed to make it more concise, better focussed on where the CAA is as an organisation and easier to understand and engage with.
- 2.9 The Panel offered comments, advice and challenge on:
- Ensuring the annual strategic objectives match the stated ambition, and being clear on how the CAA will measure and qualify that ambition;
 - For example, being clear on what 'improve environmental performance' means, such as by reviewing against targets.
 - The Panel noted the CAA could also add the intended outcome to each strategic objective, to demonstrate what difference would be expected from the CAA taking a particular action.
 - Using clearer and more direct drafting;
 - The Panel recommended engaging external consultants to facilitate development of the overarching approach to create clarity and impact. This was in recognition of the challenges faced by the Strategy Team in managing the requirements of internal stakeholders.
 - The Panel also noted that the annual strategic objectives could be more engaging to match the stated levels of ambition, and secure buy in from CAA colleagues.
 - The Panel noted the current draft of the CAA Strategy is too wordy and needs to pass 'the pub test' to be clear to both aviation stakeholders and the wider public.
 - Moving from a tactical to more strategic approach, so the CAA Strategy has broad and engaging strategic objectives to cover five-year period, while being underpinned by an annual work programme that sets out how the CAA will achieve these objectives;
 - The inclusion of a definition of the CAA's understanding of 'environmental sustainability', being clear that it is a holistic term that includes public health and biodiversity as well as the wider climate challenges.

3. Internal Panel work programme

- 3.1 The Panel reviewed its internal work programme planning to ensure a balance between the five areas of its [2023-2025 work programme](#) were reflected. The Panel are encouraged to read the internal work plan on a regular basis as this is a live document and is regularly updated.

4. CAA Aviation Environmental Review

- 4.1 The Panel discussed the CAA's proposed recommendations for the Aviation Environmental Review (AER), which is required to be published by the end of 2023. TJ noted that the 2023 recommendations are aligned with existing policies but there is scope for the CAA to potentially include further challenge from next year.
- 4.2 The Panel provided feedback, advice and challenge on:

- The existing stakeholder and regulatory landscape around air quality management, including being clear on the CAA's likely role as a convener of stakeholders, and the need for enforceable and oversight of air quality management plans;
 - DL noted that airports are already required by Defra to produce air quality plans and considers that the CAA's role would be more realistically around validating air quality monitoring by airports rather than requiring airports to produce plans. AN noted that it was not clear who would carry out the monitoring role (whether airports or Defra), and both airside and landside needed to be considered.
 - AN noted that the Clean Air Strategy 2019 has been updated this year.
- Recommendations around noise, including taking into account existing requirements on certain airports through the Noise Action Plans, the importance of a proportional approach given varying airport sizes and the importance of building databases to understand the noise levels of new airspace users.

4.3 A document has been prepared on the health of those who work at airports as they are exposed to high pollutants. It needs to be clear when looking at decibel levels how noise reduction has an impact on health. Larger airports have to have a five-year plan, but this would be difficult for smaller airports. For drones and AES, it was thought the noise contours may not work and eVTOL drones are not mentioned.

- MH asked how drones were captured in the AER in terms of noise levels and it was noted that the research of noise levels and the possible persistence of low-level noises remains poorly investigated. CC supported the recommendations around insulation schemes, but noted need to be clear that if airports are being asked to assess decibel differences as a result and quantify the impact on public health.
- CC noted that there could not be a single national noise indicator due to variations in airport sizes/characteristics, but there could be a range of noise indicators.

Management of airports is a good intention, but it might depend on the location and the different sizes. For smaller airports, a working plan may not be needed, but could be prepared should the Local Authority ask. The role of DEFRA was discussed and their focus on landside as well as airside.

- The Panel offered to TJ that they could review a list of all legislation and policy included in the AER, to highlight possible omissions that may be noteworthy from across government agencies.

4.4 The AER is due for publication next month. The three main areas of the report show the initial proposals, the seven policy elements and recommendations which align with those of EASA, ICAO, the European Commission and with government. It is less contentious this year, but it will push further next year to affect better change across the industry.

4.5 It was noted that the Hydrogen in Aviation is not an industry wide alliance, but an alliance of six companies (Rolls-Royce, Easyjet, Airbus, GKN Aerospace, Orsted and Bristol Airport)

4.6 It would be helpful to organise the information to show which items the CAA is responsible for, and which are not in their remit.

4.7 It was thought that overall, this is a good report and the language is suitable, especially on climate impact and climate affect.

4.8 CC is working on a new scheme on decibels on small airports where it might be difficult to do social engagement. She has a housebuilding guide and will send a link as TJ could pick up something pertinent. MH can send a link on helicopters taking off and will share.

5. Systems Thinking Challenge Piece

5.1 The Panel continued its consideration from the September 2023 Panel meeting in developing a systems thinking framework to support the CAA's approach when considering environmental sustainability. The Panel considered the purpose and scope of the framework, including which

environmental impacts should be captured as relevant to aviation and the different aviation 'journeys' that could be considered.

- On the brief:
 - CC noted that 'all environmental impacts' was too broad a scope, and suggested refining to 'all possible environmental impacts'.
 - MW noted his view that the purpose of the framework was to reduce blind spots in CAA decisions around environmental impacts – helping the CAA recognise (without quantifying) the range of impacts a decision could potentially have. Such a framework could, for example, be used as part of the CAA's influencing role to advise others it works with and enable the CAA to be a better arbiter of discussions. It could also protect the CAA from risks of being asked narrow questions, such as the DfT's trade off work which was presented to the Panel earlier this year.
 - RMR noted that at this stage the framework would not be highly detailed, but instead would act as a 'thought prompter' to help the CAA think "what about [x]?" when given a problem or decision? CC agreed the framework is to make the CAA aware of the relevant issues and understand they are all connected, without necessarily giving the answers.
 - NS noted it would be helpful to the CAA to have the 'so what' question answered in the framework – why should the CAA care about this?
 - **Action: RMR to revise and recirculate the systems thinking challenge note brief to the Panel and CAA for agreement.**

- On the map developed by AL:
 - The Panel discussed having discipline and boundaries around the boundaries of what is included.
 - CM considered that the decision-making process by the passenger needed to be included in the map.
 - NS noted the cruise stage of a flight is not included in the map.
 - MH noted that it could be valuable to be able to understand the relative importance of different elements of the map.
 - NS noted it would be helpful to be able to filter elements of the map, such as to show where the CAA regulates/reports/monitors.
 - On the potential use of the map, the Panel discussed:
 - Using it to demonstrate to different CAA teams the range of potential environmental impacts if required to address the environmental principles under the Environment Act 2021.
 - **Action: MH and CC to build on map to include further elements of the aviation system.**
 - **Action: all to consider options for use of the systems thinking map and bring these to January Panel session to workshop. CAA will provide large print outs for workshop.**

- On the journeys proposed by MW:
 - CM noted that system design is based on a particular case, and suggested a different map for each sort of journey.
 - Noting there is no single model to evaluate the environmental impact of aviation, the Panel agreed to develop 2-3 maps to reflect 2-3 different journeys: long haul journey with a wide body aircraft; short haul journey with a narrow body aircraft; and a drone flight.

- MW noted the maps could also show both the economic and environmental costs of different journeys with different fuels. MW also noted the herd mentality of moving to new technologies without considering the cost – is it plausible to have both SAF and hydrogen infrastructure?
- 5.2 The aim is to help the CAA to show what they are not thinking about, to provide clarity and shows the various bodies they connect with and will act as guidance to help ExCo make decisions. The framework shows the aviation journey and how it all connects, showing the environmental consequences and impacts. There needs to be more on noise, which will be added.
- 5.3 RMR asked for all to give this further thought and adding comments to aim to get this completed in the next six months. It was agreed to consider the map and journeys in a workshop format at the January 2024 Panel Meeting.

6 Brainstorming Session on knowns/unknowns for CAA

- 6.1 The Panel discussed development of a resource that helps the CAA understand what is widely accepted as known and unknown in aviation sustainability knowledge. The Panel discussed methodologies for establishing confidence in what is known and unknown, including the methodology used by the IPCC. While this piece of work by the Panel will not gather evidence, such examples are a good basis to start from in establishing areas where there is high confidence of knowledge and thoughts.
- 6.2 The Panel noted areas where they consider there are unknowns. For example, the impact of drones is generally considered as the impact of a single drone, but it is less clear what the environmental impact of multiple drones would be. This resource will not consider trade offs between environmental impacts, but is intended to trigger the CAA to say ‘but what about...’ when faced with a sustainability issue.
- 6.3 AG noted that parts of the CAA appear to be mainly focussed on the development of RPAS, BVLOS and drones, but may benefit from support to recognise that other technologies (like hydrogen) are also imminent. It was noted that this piece of work will be caveated as the view of the Panel, and will be regularly reviewed.

7 Summary of Upcoming Meetings

The next Panel meeting is on the 17 January 2024. There will not be an interim meeting during December.

8 AoB

None.

- 7.1 Chairs of the Environmental Sustainability and Consumer Panels have met again and are considering a joint working session for the first quarter of 2024.