Published name

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Short comment

The Aviation Green Paper points to only modest means to rein in the outsize contribution discretionary emissions from air travel makes to climate change

Thank you for the opportunity to comment on the Aviation Green Paper. I would like to draw attention to the very modest goals implied by Chapter 5, **Maximising aviation's contribution to net zero**.

The substantive pathways to reduce emissions identified in the document are efficiency gains, new propulsion technologies, high quality carbon offsets, flight alternatives and sustainable aviation fuels. Of these, only flight alternatives has the potential to make significant reductions in emissions.

Efficiency gains in the order of one to two percent per annum if realised will be rapidly eclipsed by forecast increases in global air traffic. Assuming extraordinary improvements in the sector, at best we could hope for a 20% improvement over the course of the next two decades. However, as the average age of the global fleet is around 10 years and in some cases older, the follow through contribution to a reduction in emissions could be in the order of thirty to forty years. Moreover, the industry should already recognise the value gains that are to be made in improvements in airspace use and on ground management practices.

Changes to **propulsion technologies** are entirely speculative and remain at a very early stage of development. It is neither practical nor appropriate to include consideration of these in development of the white paper as their future remains entirely hypothetical.

The section on **high-quality carbon offsets** highlights by its phrasing the deeply problematic manner of this form of abatement of warming contribution. The concept itself has become highly controversial as many of the offset projects have been found to have been attributed to sites which otherwise would not have been cleared or altered in the present economic conditions. Of course we are all aware of recent reporting of significant evidence that up to 75% of Australian carbon credit units "are not resulting in real emissions reductions or are not 'additional'" (https://australiainstitute.org.au/post/carbon-credits-and-offsets-explained/).

Finally, the idea that the industry will be saved by the use of **sustainable aviation fuels** is implicit in many references within the green paper, far in excess of any real potential for these products to make a substantive difference. Sustainable aviation fuels in a net zero environment would need themselves to be produced with zero emissions, implying a zero-cost product invoking the idea of a perpetual motion machine. Not only is this self-evidently absurd but it ignores the fact that it would require the displacement of agricultural production to clothe and feed humanity for the purpose of discretionary travel options.

Given the critical nature of the challenges we face extraordinary measures are called for. The White Paper must identify the importance of demand reduction as the most substantive way to reduce emissions and warming contributions by the sector.