



## LAPFF Response to Jet Zero further technical consultation

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### Background

- The Local Authority Pension Fund Forum (LAPFF) is a voluntary association of 85 local authority pension funds and six LGPS pools, with combined assets of over £350 billion. It exists to promote the investment interests of member funds, and to maximise their influence as shareholders to promote high standards of corporate governance and corporate responsibility amongst the companies in which they invest.

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### Response

- LAPFF welcomes the opportunity to respond to additional questions set out in the further technical consultation. This section outlines our overall position, specific consultation questions are addressed in the following section.
- LAPFF has long recognised the imperative to address climate change as a systemic investment concern for our members. It poses material financial risks across all asset classes with the potential for significant loss of shareholder value. Emissions from air transport are a significant contributor to economic and investment risk. Our experience engaging with companies is that, without strong and timely regulation, achieving the UK's ambitions for reducing emissions will be slower and less effective as some companies tend only to meet minimum regulatory requirements.
- LAPFF is concerned that the progress made in electric flight, even since the original 'Jet Zero' consultation has not been reflected in the development of the four scenarios and thus in conclusions set out in the consultation.
- LAPFF considers that all measures to promote net zero aviation should be considered within the context of overall provision of reliable and affordable transport including surface transport. LAPFF supports the government pushing for domestic flights to be replaced by train journeys and for any remaining domestic flights to be provided by electric aircraft. This is in line with measures being taken by Austria, France, the Netherlands and Spain.

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## Detailed response

1. *Do you agree or disagree with the range of illustrative scenarios that we have set out as possible trajectories to net zero in 2050? Are there any alternative evidence-based scenarios we should be considering? (question 2 of the initial consultation).*

Given that achieving net-zero by 2050 only gives a 50% chance of remaining within 1.5 degrees, LAPFF considers the Department for Transport could have taken the opportunity of this further technical consultation to include a scenario with a trajectory for a date well in advance of 2050.

As in the first 'Jet Zero' consultation document, the only 'demand management' aspect considered is that of carbon pricing. The amended scenarios seem to ignore the potential for regulatory pressure to promote surface transport via rail and road to make it not only a reliable but affordable substitute for air travel.

Additionally the opportunity does not seem to have been taken to show what proportion of international aviation could be replaced with a series of short-haul electric flights.

2. *Do you agree or disagree with the possible trajectories we set out, which have in-sector CO<sub>2</sub>e emissions of 36Mt in 2030, 28Mt in 2040 and 15Mt in 2050, or net CO<sub>2</sub>e emissions of 24-29Mt in 2030, 12-17Mt in 2040 and 0Mt in 2050? (question 3b of the initial consultation - values updated in line with the new analysis)*

As with LAPFF's previous response on possible trajectories, LAPFF agrees that they are 'possible' but would urge the government to aim for robust and ambitious targets starting from 2025.

3. *Do you have any other comments in relation to the updated illustrative scenarios?*

The first scenario is supposed to represent a continuation of current trends in UK aviation. In this it is stated there is 'no introduction of zero-emission aircraft'. However this appears to ignore current trends for electric flight. A study commissioned by the Netherlands to investigate the feasibility of electric aircraft has concluded commercial services by small, short-range e-planes could begin as early as 2026<sup>1</sup>. As reported in July 2021, United Airlines agreed to buy 100 electric planes from Heart Aerospace 'to decarbonise regional air travel'<sup>2</sup>. These planes are 19 seaters but already

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<sup>1</sup> <https://www.greenairnews.com/?p=2644>

<sup>2</sup> <https://www.reuters.com/business/sustainable-business/united-airlines-buy-100-19-seat-electric-planes-heart-aerospace-2021-07-13/>

Wright Electric is working to retrofit existing aircraft, for example the Bae 146, a 100-passenger plane, which is targeted for entry into service in 2026<sup>3</sup>.

Indeed, even scenario 4 'High ambition with breakthrough on Zero Emission Aircraft' does not seem to recognise existing electric flight technology and refers to keeping up with 'with new technologies as they emerge' and with electric aircraft only being referred to in parenthesis.

In relation to scenario 3 'High ambition with breakthrough on SAF' (sustainable aviation fuels) LAPFF retains its view that providing support for technologies such as SAF still results in carbon emissions and locks this continued technology into the system. This is ultimately a missed opportunity and mis-use of resources that would be best spent on developing zero-carbon flight.

LAPFF is further concerned that the highest ambition scenario (4) has adjusted the use of sustainable aviation fuel from 30% uptake (in the original Jet Zero consultation document) to 50% uptake by 2050, whilst it has adjusted the zero-emission tech uptake on Air Transport Miles (ATMs) downwards from 53% in the original document to only 38% of ATMs by 2050.

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<sup>3</sup> <https://www.greenairnews.com/?p=2187>