

## Consumer Environmental Information

### Call for Evidence, CAP2395

### CAA Consumer Panel response

#### **Contact information and publication of responses**

*When you respond, please provide your name, email address, name of organisation or that you are responding as an individual, type of organisation, country and whether your response is confidential. If you provide a confidential response, please also provide a non-confidential response that can be published on our website.*

**Name of organisation:** CAA Consumer Panel

The CAA Consumer Panel is a non-statutory critical friend, giving expert advice to the Civil Aviation Authority (CAA) as policy is being developed, to ensure aviation consumer interests are central. We are a group of independent experts, who bring together deep consumer expertise and experience along with strategic thinking, applying these in a practical way to improve the experience for aviation passengers. Our role is to champion the interests of consumers.

**Country:** UK

Confidentiality: This response is not confidential.

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#### **Summary comments**

- A. We welcome this call for evidence and the CAA's proactive and constructive approach in working with the Panel on this issue in recent years. The document is clear and well written, and includes a clear consumer focus which the Panel thinks is important in the context of strong industry interest in this area.
- B. Our response focuses on those questions relating to the presentation of consumer information, and not those of a more technical nature relating to the methodology for calculating emissions which is outside our remit.
- C. We welcome the CAA's intention to publish its next consultation later in 2023 (including possible guidance and recommendations around the methodology for calculating and presenting consumer environmental information) and consider further delay is unlikely to be in consumers' interests. Indeed, recent consumer evidence<sup>1</sup> supports the 2021

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<sup>1</sup> In March 2023, [Travel Weekly](#) reported that almost half of people are more likely to book with a company that prioritises sustainability, according to a poll by Audley Travel. A similar proportion of the 3,369 people surveyed said that they wanted to know more about how to travel sustainably. Almost a third (32 per cent)

Britain Thinks research findings that a growing proportion of consumers are concerned about the environmental impact of flying and want more information about how to travel sustainably. Unfortunately, there is already a proliferation of non-standardised, inconsistent and unverified information available to consumers which risks causing confusion and erodes trust and confidence in choosing more sustainable flying options.

- D. Following appropriate consultation, we feel the CAA should swiftly introduce a recommended framework on the calculation and publication of consumer environmental information to transition the industry towards a single source of truth which should be verified with a CAA 'stamp of approval.' We also feel the CAA should set an appropriate timeframe for the industry to transition to the new arrangements. Over time, the new arrangements will allow consumers to see standardised, accurate and trusted environmental information on different booking platforms across the industry (via direct airline bookings, on flight comparison sites and ATOL protected holidays) and make more informed decisions. We strongly feel that a lack of industry and academic consensus around the method for calculating emissions and the fact that the science in this area is still evolving, need not prevent the CAA progressing this important work. We think it is possible to develop a method of presenting environmental information to consumers (the front-end that consumers see, such as a traffic light system) based on an appropriate scientific methodology and inputs from the best available data which should apply consistently across the industry to ensure there is a level playing field.
- E. Once this new method of presenting environmental information is publicly available, consumers can familiarise themselves with it which should help build trust. In due course, iterative changes to the inputs or types of data that determine the hierarchy or ranking of green credentials can be made over time without needing to change the front-end method of presentation that consumers see. Perfection should not be the enemy of progress, and it's likely that ongoing scientific and technological developments will mean that this is an iterative process which the CAA can build on over time as has been the case in other sectors where standardised consumer information has been introduced, such as food labelling.
- F. Ahead of its next consultation, we urge the CAA to undertake further qualitative research (building on the Britain Thinks piece) to test and cross-check various options with consumers on how environmental information could be presented, focusing on which option(s) they find easiest to understand. This research could then help inform key areas of focus in the next wave of the CAA's Aviation Consumer Survey (expected in the Autumn) and the CAA's policy development and decision on a new framework for consumer environmental information towards the end of the year. Such research will not only allow the CAA to gain a better understanding from consumers directly on what method(s) of presentation works best for them and the impact such methods might have on their behaviour and psychology, it could also help gain buy in from the industry and bring stakeholders with opposing views on board. The Panel is happy to work with the CAA in developing its approach to any future research in this area

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are willing to pay more to incorporate sustainable options in their travel plans, the results of the study conducted by the tailor-made operator found. Meanwhile, 41 per cent plan to spend more than usual on travel and the same number saying they aim to travel more than normal.

- G. The method of presentation the CAA adopts should be engaging, clear and simple for consumers to understand with the option of providing further detail if consumers wish to find out more which should be clearly signposted. This is supported by the Britain Thinks research which found that consumers do not necessarily want to be given technical detail in the first instance and prefer to have “pre-digested” information that summarises the environmental impact at a glance. Moreover, consumers already have a lot of information to digest and compare when booking flights (including costs, accommodation, insurance and getting to the airport) and technical environmental information could create additional barriers and anxiety. We are also mindful that the information and method of presentation needs to be understood by a wide range of consumers, including those who have accessibility needs and are at risk of vulnerability including those with visual impairment. Therefore, a multi-layered approach to presenting environmental information which is accessible and can be tailored is more likely to be appropriate.
- H. We appreciate there is a difficult balance for the CAA to strike in ensuring environmental information is clear and simple to understand while also being informative, meaningful, accurate and capable of nuance and also giving consumers the option to differentiate and trade-off between different flight options if they want more information. We think consumer research that explores this issue could help the CAA select an appropriate method of presentation that avoids the risk of over simplifying information and inadvertently misstating green credentials via a blunt method of presentation, which in turn could potentially be misinterpreted by consumers.
- I. The CAA should also give careful thought as to how it will incentivise, monitor and enforce compliance with its framework.
- J. In terms of incentivising and monitoring compliance, we see merit in the CAA using reputational levers akin to those it uses for the airport and airline accessibility frameworks. These frameworks rank industry stakeholders’ accessibility performance in a league table according to CAA guidance and relevant criteria which is published in a report on an annual basis. The CAA’s airport accessibility reports often gain notable media coverage and can cause significant reputational damage for poor performing stakeholders, which can incentivise swift remedial action. We consider the CAA’s airport accessibility framework has been effective in driving industry behavioural change in the area of accessibility and could be a useful model to adapt in respect of consumer environmental information.
- K. Where there is serious and systematic consumer detriment, the CAA should consider making better use of its existing concurrent<sup>2</sup> consumer protection powers and working with other regulators including the CMA<sup>3</sup> and ASA<sup>4</sup> in respect of misleading ‘greenwashing’ environmental information. This is in the context of an increasing number of complaints against airlines’ greenwashing practices being reported in the press and is an area that the CAA should explore further in the near future.

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<sup>2</sup> We note that the CAA has a memorandum of understanding with the CMA to coordinate enforcement and cooperate on the use of concurrent consumer protection powers.

<sup>3</sup> Competition Markets Authority.

<sup>4</sup> Advertising Standards Authority.

## Consumer environmental information

1. *What are your views on existing examples of aviation consumer environmental information (for example those listed in Appendix A)?*

The examples listed in Appendix A demonstrate that consumers have access to a wide range of inconsistent and non-standardised aviation environmental information, which are based on different methodologies and calculated using different inputs.

This can cause confusion for consumers who find it difficult to compare and make sense of different information which in turn could mislead them and erode trust and confidence.

This underlines the importance of the CAA's work in this area to move the industry towards a single source of truth of standardised, accurate, comparable and accessible information that is appropriately presented to allow consumers to make more informed decisions.

As noted above, there is already a proliferation of non-standardised and inconsistent environmental information so the CAA's work in this area is an important step in rebuilding consumer confidence and trust.

2. *Please list/identify examples of existing schemes for the provision of aviation consumer environmental information beyond those listed in Appendix A Presentation of information to consumers*

We are not aware of other schemes relating to the provision of environmental information in the aviation sector but there are several schemes for the standardisation of consumer information in other sectors that the CAA should explore. See footnote for further information.<sup>5</sup>

We also note that the FCA<sup>6</sup> has recently updated on its sustainability disclosure requirements and investment labels consultation<sup>7</sup> which the CAA should review to identify if there are any lessons that could be learnt. Also, in response to an earlier FCA consultation we note that the Financial Services Consumer Panel (FSCP) recommended that: "information, education, guidance and advice [should be] readily available and tailored to the consumer to ensure they are supported in taking decisions..." and "products must be better designed, labelled and described to enable consumers to better understand fully the opportunities, risks and costs involved and easily compare these across options". This suggests the underlying principles for standardised consumer information apply across different sectors.

We also see merit in the CAA engaging with the BSI<sup>8</sup> about developing a potential 'stamp of approval' or kitemark scheme to provide assurance to consumers that the information they see is vetted and trustworthy.

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<sup>5</sup> Such schemes include: [energy ratings for washing machines](#), the [BSI kitemark](#) for food assurance, the Food Standards Agency's [traffic light system](#) and the [BSI kitemark](#) for energy reduction verification.

<sup>6</sup> Financial Conduct Authority

<sup>7</sup> <https://www.fca.org.uk/news/news-stories/fca-updates-sustainability-disclosure-requirements-and-investment-labels-consultation>

<sup>8</sup> British Standards Institution

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3. *What are the key requirements for the presentation of: a) accurate, b) understandable, c) standardised, d) comparable e) accessible and f) useful consumer environmental information?*

We refer to our above comments in paragraphs A-K.

We also think the principles identified in the Britain Thinks consumer research in 2021 are a good starting point to develop appropriate requirements for consumer environmental information. These include:

- Avoiding industry jargon – aviation environmental terms are generally not well understood
- Reducing effort of trade-offs – most consumers are looking for pre-digested information that summarises the environmental impact at a glance, and are unlikely to spend time trading off across different metrics
- Keeping it consistent – ratings/metrics and language need to be standardised across the industry
- Putting information front and centre of relevant points in journey
- Clearly marking information as vetted to build consumer trust and confidence

As set out in paragraph F above, we stress that the CAA will have a much stronger evidence base in developing key requirements for consumer environmental information if it undertakes further consumer research.

4. *What consumer environmental information should be presented to consumers?*

We refer to paragraphs G and H above.

As set out in paragraph F above, we stress that the CAA will have a much stronger evidence base in deciding what consumer environmental information to present to consumers, if it tests various options with consumers directly through further research.

5. *When should consumer environmental information be presented to consumers? (For example on the results page when searching for a flight, on a boarding pass or after a flight)*

This should be tested with consumers directly through qualitative research to identify which platforms and at what stage(s) of the booking process such information should be presented.

As a general rule, information should be presented at an early enough stage for consumers to use it as part of their decision making. Presenting information too late in the process could make it harder for them to make informed choices.

It might be appropriate to present information to passengers on the results page when searching for flights and again as they proceed towards payment. However, the platform that consumers use to book flights is a relevant consideration in respect of when information should be presented – for example where consumers use a flight comparison site there might need to be multiple stages where environmental information is presented including at the initial search stage and as consumers narrow down options so they can better compare green credentials. This should be explored with consumers through further research.

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6. *How should consumer environmental information be presented? For example is kg/CO2 per journey appropriate and / or should consumer environmental information be presented as a comparison with other transport modes or other equivalent activities?*

Please see paragraphs G and H above.

We feel kg/CO2 per journey might be a well-established term from the industry's perspective but is likely to be considered abstract and difficult to understand for consumers who would need further information to contextualise it – for example, in terms of equivalence to other modes of transport. As part of the multi-layered approach set out in paragraph G above, if consumers want to find out further information on the environmental impact of their selected flight(s), they should be given the option to do this through appropriate signposting – which could potentially include kg/CO2 per journey. However, this should be tested with consumers directly through qualitative research.

7. *Please list/identify examples of consumer environmental information in other sectors which enable complex information to be provided in an accurate, understandable, standardised, comparable, accessible and useful way*

Please see response to question 2 above. The CAA might also want to look into comparison sites for insurance products and energy prices to see how information is presented.

### Consumer protection

8. *How should we (the CAA) use our existing powers to protect consumers from misleading environmental information?*

Please see paragraphs I – K above.

9. *Please list/identify examples of regulatory regimes in other sectors that work well to protect consumers from misleading environmental information.*

Please see paragraphs I-K above and the Panel's response to question 2.

10. *How should the provision of consumer environmental information be monitored?*

Please see paragraphs I – K above.

### Potential and existing methodologies for the provision of consumer environmental information

11. *If you have an existing relevant methodology for calculating emissions from a journey: a. please describe it and the reasoning behind it, including details of the types of information you include in the methodology and the assumptions you make. b. If your organisation has made a conscious choice not to include certain types of potentially relevant information in your methodology yet, please set out the reasons why. c. If potentially relevant information may be included in your methodology in the future, please describe the information and any necessary background to its potential inclusion.*

Not applicable to the Panel's remit

12. *If you haven't developed a methodology, what would you expect to see in a methodology (for example different aircraft types, fuels, average load factors, the*

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*airline's overall fleet, and routes including generalised indicators relating to destination / origin airports)?*

Not applicable to the Panel's remit

*13. How should we (the CAA) take non-CO2 emissions and their effects into account?*

Please see paragraph D and E above.

We think it could be useful to explore this issue in consumer research to understand what information consumers want, find useful and how they intend to use it. This could help inform the CAA on whether non-CO2 emissions should be included in front-end information that consumers see or in secondary signposted information, or if this would complicate and confuse matters for consumers. The research could also consider whether consumers want a single number that represents CO2 or if they would prefer a more holistic view reflected in the information they see.

### Data

*14. Which existing standardised datasets do you think could be repurposed (with the necessary safeguards) to provide environmental consumer information? For example, the International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSA) CO2 Estimation and Reporting Tool.*

Not applicable to the Panel's remit

*15. Should there be a mandatory requirement for airlines to provide relevant environmental data to the CAA and if so how should this be aligned with existing requirements?*  
*Relevant research*

We note that the CAA has a duty to publish or arrange for the publication of information about the environmental effects of civil aviation as well as measures taken or proposed to be taken with a view to reducing, controlling or mitigating the adverse environmental effects of civil aviation in the UK.<sup>9</sup> We also note that the CAA is in the process of enhancing its reporting functions, including annual reporting on the sustainability performance of UK aviation industry.

We feel it could be appropriate for there to be a mandatory requirement for airlines to provide relevant data, which could help increase transparency and build consumer trust. Such information could be particularly useful in providing a baseline for the CAA to measure the veracity of airlines' environmental sustainability claims.

### Relevant research

*16. The CAA published research on what consumers want from consumer environmental information in 2021. Have you undertaken similar or related relevant research which you can share with us?*

Please see paragraph F above. We urge the CAA to undertake further research ahead of its next consultation to inform its policy and decision making.

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<sup>9</sup> Civil Aviation Act 2012, section 84.

## Potential pitfalls and any other additional information

*17. What do you think are the potential pitfalls relating to the provision of consumer environmental information?*

*18. What strategies should we consider to mitigate potential negative consequences?*

Please see paragraphs G and H above, which set out some of the pitfalls relating to the provision of consumer environmental information. We think consumer research is the main way the CAA can mitigate potential negative consequences, as this will strengthen CAA's evidence base and ensure its proposed framework has been tested with consumers beforehand, which is likely to reduce the risk of unintended or negative consequences.

The CAA should also engage with other regulators and bodies who have introduced standardised consumer information, to identify potential pitfalls and learn lessons. See response to question above 2 above for further information.

*19. Is there anything else that you think we should be aware of in relation to the provision of consumer environmental information, beyond the areas mentioned above?*

The CAA should engage with other UK transport regulators and bodies (such as the ORR and Transport Focus) and in Europe and internationally with a view to developing a consistent multi-modal approach to consumer environmental information over the longer term.