

BALPA Aviation Recovery Plan January 2022



Overview

The UK's aviation sector became arguably the best and third largest in the world because Governments over decades developed a deliberately supportive and competitive environment with a strong regulator at its heart. It did not happen by accident and will not recover spontaneously either.

The British Airline Pilots' Association is the second largest member of the global pilot body, IFALPA, representing over 10,000 pilots and is recognised as a partner in 23 different companies: over 85% of all commercial pilots flying in the UK are represented by BALPA.

BALPA welcomes the full review of travel measures, promised by the end of January. We have prepared this Aviation Recovery Plan to support the Government in its review, and all our members stand ready to turbo charge the economic recovery for UK plc.

Next phase

The UK's aviation sector was harder hit than most countries in Europe. Our limited recovery to date is significantly behind the rest of Europe: the UK's airports are at the forefront of the worst affected by Covid¹. Gatwick remains the worst affected airport in Europe, as it has been for much of the pandemic. The economic and social harms inflicted by stringent measures must be recognised and any public health benefits better justified.

Omicron has shown that rapidly introduced new testing requirements have a severe and immediate effect on bookings and confidence in travel. Given that they did little to nothing to slow the spread of Omicron, the balance of economic harm vs. health benefits was wrong and unnecessarily damaging.

Future variants must be managed with a better balance and proportionate health measures. Aligning with domestic policy will go a long way to achieving this. **International travel is not the front line of defence in managing new variants of concern.** A proportionate, data and evidence led approach is needed.

Public confidence

Public confidence in travel, including a full return to pre-Covid travel rules, will be key to getting the sector back up to speed this Spring and Summer. **Simplicity and consistency** are paramount.

The previous 21 months have seen strong Government messaging against travel combined with inconsistent and ever-changing rules destroying confidence in travel. This anti-travel messaging must now be countered with positive, pro-travel communications to support the recovery and the recovery of a sector so important to exploiting the UK's global trade and world leading ambitions.

Testing

The UK's aviation market is essentially an international one, with relatively little domestic traffic, and must be aligned with international measures to make the UK an easy – and not burdensome – place

 $^{^1\,}https://www.eurocontrol.int/sites/default/files/2022-01/covid19-eurocontrol-comprehensive-air-traffic-assessment-13012022-update.pdf$



to visit, do business and connect through. BALPA therefore supports the scrapping of any type of testing for fully vaccinated passengers, in line with ICAO and WHO guidance².

Key for the UK Government approach is ICAO Council Aviation Recovery Task Force (CART) Recommendation 19: "In this regard, Member States should consider alleviating or exempting testing and/or quarantine measures for individuals who have been fully vaccinated or those with a history of previous SARS-CoV-2 infection who are no longer infectious"³.

This is supported by WHO COVID task force 10 meeting recommendations: "Lift or ease international traffic bans as they do not provide added value and continue to contribute to the economic and social stress experienced by States Parties. The failure of travel restrictions introduced after the detection and reporting of Omicron variant to limit international spread of Omicron demonstrates the ineffectiveness of such measures over time."

Government must subsidise, through the NHS, the costs of any testing that remains required for unvaccinated passengers on medical grounds or those coming from countries with very high risk.

The sequencing benefits that PCR tests offer can be gained from the domestic population. If random or targeted testing of passengers for this purpose is necessary, for example in response to a heightened risk profile from a particular country or new variant, then it must be funded and easily available through the NHS. This would provide a strong public safeguard without suppressing air travel and causing needless harm to the economy and our global connectivity.

Industry issues

- 1. BALPA continues to campaign for a reciprocal Flight Crew and Engineer Licence agreement between the UK and EU, which would benefit all UK airlines. This would address the imbalance following Brexit and the Government must address it urgently.
- 2. Fire and re-hire tactics are shameful and should be outlawed in the UK.
- 3. The Passenger Locator Form requires significant simplification to ensure that it is both effective but not a barrier to travel.
- 4. Continuing exemptions for flight crew who can be in multiple countries across a several day or week period to ensure ease of travel and no undue burden on normal life, eg. Quarantine such as that seen in Hong Kong.

Sustainable Aviation Fuels & APD

The aviation industry is being asked to make profound, transformative changes in very short order to meet its emissions targets, which comes with an immense cost. Following Covid, the case has never been stronger for APD to be used to help fund this challenge.

An allowance for all APD raised which supports the rapid transition to SAF would satisfy the ecological concerns and allow the return of revenue to the exchequer when APD could subsequently be abolished for good fiscal reasons.

BALPA suggests that the UK Government takes a leadership position by allowing a partial or full allowance of APD for airlines who invest that in SAF programmes. This would not allow a reduction

² https://www.who.int/news/item/19-01-2022-statement-on-the-tenth-meeting-of-the-international-health-regulations-(2005)-emergency-committee-regarding-the-coronavirus-disease-(covid-19)-pandemic

³ https://www.icao.int/safety/CAPSCA/PublishingImages/Pages/CART-Guidance/CART%20Updated%20Recommendations.en.pdf



in passenger costs –APD would still be charged, but up to 100% of it could be used by the industry to develop sustainable aviation for the future.

Non-CO₂ effects of aviation & UK contrail avoidance trial

The latest research shows that carbon dioxide is not aviation's biggest contribution to effective radiative forcing (global warming), in fact the largest factor is aviation-induced cloudiness (AIC)⁴. AIC can be greatly reduced, quickly and easily, using existing tools and without change to aircraft or fuel technology. The UK is already at the forefront of this work, with Satavia able to provide the required forecasting and flight planning tools⁵ and Professor David Lee's team at the Manchester Metropolitan University leading the science⁶.

The UK should exploit this position to urgently design and implement a large-scale and meaningful trial of contrail avoidance, noting that aircraft powered by SAF or hydrogen also cause AIC so these measures will be needed long term.

Rarely will there be an opportunity to make such a major environmental improvement at such little cost and difficulty. We urge the government to make the necessary funding and resources available to conduct a conclusive trial as soon as possible, and to act on the findings rapidly.

In conclusion, UK aviation has supported the global UK economy and the most important of UK industries such as the service sector, financial institutions and pharmaceuticals, to name just a few. The world leading position for UK aviation was created with the help of a deliberately supportive environment fostered by governments of all political colours. Recovery from pandemic induced restrictions will not happen spontaneously and BALPA calls on the Government to again foster a supportive environment, specifically:

- Accept the negligible effect testing, quarantine and other restrictions on international travel
 have on preventing the spread of new variants of any respiratory disease and publicly
 declare adherence to ICAO and WHO recommendations against such restrictions for all
 future new variants.
- Work with the whole industry, including associations with national scope such as BALPA, to restore the supportive and ambitious UK aviation sector to its pre-covid world leading position.
- 3. Engage with the entire industry to broaden the experience available to the Jet Zero Council to ensure the UK leads the world in the decarbonisation of air transport. Start with contrail avoidance and the reduction of aviation induced cloudiness, allow the use of APD and other green tax initiatives to fund research and development and restore the UK as a major player in the aviation sector, globally.

For more information, please contact

communications@balpa.org

⁴ The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018. Lee et al. Atmospheric Environment (2021). https://tinvurl.com/3kmriazd

⁵ DecisionX: Net Zero. Satavia (2020). https://tinyurl.com/b96539s4

⁶ Mitigation of Non-CO2 Aviation's Climate Impact by Changing Cruise Altitudes, S. Matthes, L. Lim, U. Burkhardt et al., Aerospace 8(2), 36. (2021) https://tinyurl.com/3fyvpdnp