# Consumer Environmental Information: Consultation on draft principles for aviation consumer environmental information

## About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base

- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors

- to enable the active participation of consumers in a fairer economy by improving access to information and support

Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

# Our response

Question 1. What is your name?

Kathryn Gill


Question 2. What is your email address?

Kathryn.gill@consumer.scot


Question 3.  What country are you responding from?

Scotland


Question 4. Are you responding from an organisation or as an individual?

Organisation


Question 5. Which organisation are you responding from?

Consumer Scotland


Question 6. What type of organisation do you represent?

Non Ministerial Office


Question 7. Can we publish your response?

Yes


Question 8. Please rank each of the draft principles from 1 (most important) to 9 (least important)

No response

Question 9. To what extent, if at all, do you agree or disagree that the draft principles provide actionable guidance for airlines on data publication

Consumer Scotland welcomes the publication of the draft proposals. We consider that there are potential consumer benefits in providing actionable guidance for airlines on how they should provide data on sustainability issues.

The Consumer Principles are a set of principles developed by consumer organisations in the UK and overseas. Consumer Scotland uses the Consumer Principles as a framework through which to analyse the evidence on markets and related issues from a consumer perspective.

The Consumer Principles are:

- Access: Can people get the goods or services they need or want?

- Choice: Is there any?

- Safety: Are the goods or services dangerous to health or welfare?

- Information: Is it available, accurate and useful?

- Fairness: Are some or all consumers unfairly discriminated against?

- Representation: Do consumers have a say in how goods or services are provided?

- Redress: If things go wrong, is there a system for making things right?

- Sustainability: Are consumers enabled to make sustainable choices?

We have identified choice, information and sustainability as the Consumer Principles which are particularly relevant to this consultation response.

In line with the Consumer Principles of choice and information, we support the aim that consumers should be able to make more informed travel choices when booking flights and package holidays, to or within the UK, by accessing information on the environmental impact of flights.

Consumer Scotland welcomes the draft principles developed by the CAA which set out that information supplied by providers must be accessible, transparent, accountable and accurate, specific, timely, consistent, standardised and comparable. We consider that this requirement aligns well with the Consumer Principles used by Consumer Scotland, in particular choice and information. Consumer Scotland welcomes any measures that can be taken to increase transparency, improve choice and promote consumer confidence. The draft principles outlined in the consultation have the potential to ensure consumers are provided with clear and accurate information about the environmental impact of flights

which will facilitate a greater ability for consumers to make an informed choice in line with their sustainability preferences.

It is firmly established that our climate is changing faster than expected and this will have a wide range of impacts on consumers, communities and businesses in Scotland.[1] All sectors will need to play their part in the transition to net zero, and households, businesses and communities will need to make changes to their lifestyles, business practices, and consumption habits. The Climate Change Committee (CCC) has estimated that over 60% of the emissions reductions that will be needed to meet net zero will be predicated on some kind of individual or societal behavioural change.[2]

Research conducted on behalf of Consumer Scotland has shown that consumers are concerned about climate change, with 76% of respondents to our most recent survey stating that they are either 'very' or 'fairly' concerned about climate change.[3] Despite this reported concern, our research found that consumers are unclear about how the journey to net zero will be achieved and how their actions can contribute to meeting climate targets.[4] We also comment on some transport related findings from this research later in this response.

In line with the Consumer Principle of choice, the draft principles have the potential to improve the ability of consumers to make meaningful choices that are in line with their sustainability preferences, including having access to accurate and meaningful information, at the right time, and in a format that makes it easy to compare to support making those choices. The Competition and Markets Authority has found that consumers are increasingly concerned about the environmental impact of the products and services that they buy and are seeking to purchase products and services which minimise harm to, or have a positive effect on, the environment.[5]

There is evidence to suggest that consumers value clear and accurate information relating to sustainability practices of businesses, with research carried out for Deloitte finding that more than half of consumers surveyed stated that the commitment of businesses to climate change and sustainability can influence their level of trust in them.[6] In line with the consumer principle of providing information, making sure that consumers are able to interpret and trust the information provided will be a key part of supporting them to assess the climate impacts of the products and services they are purchasing.

Research has shown that in the UK 86% of travellers who recently booked online travel used an online travel agent in the 45 days leading up to the booking compared to 51% who used an airline site or app.[7] [8] As a result of this, there would be benefits to this information being provided in a way that would allow it to be used and displayed across these travel agent sites to maximise the number of consumers who will see this information during the booking process.

It will be important for the information provided to consumers to be available in a clear and accessible format and avoid unnecessarily complicated language. Our research has found

that many consumers have a limited awareness of specific policies and terminologies surrounding net zero and may not relate these terms to their own behaviours and choices.

This was particularly found to be the case with terminology that is newer or less frequently used, and particularly when language is felt to be vague, unintuitive or frustrating.[9] The Advertising Standards Authority also found that terms such as 'carbon neutral' and 'net zero', were more familiar to consumers than others, but there is a lack of consensus as to their meanings and confusion about the differences between the terms.[10]

It is important to note that research into environmental claims in advertising has found that while consumers feel that environmental claims seem like a good idea in theory, the extent and variety of claims has limited their usefulness in practice, resulting in calls for rationalisation and standardisation of terms, greater clarity in terms used or investment in public education and policing of terms used.[11] It is important that any terminology that is used has a clear and agreed definition so that terms used are understood in the same way by providers. This will ensure that the information is comparable and can be explained to consumers in clear, consistent and simple terms.

Question 10. In relation to the draft principle that information should be timely, how often do you think that data should be updated? (daily, weekly, monthly, quarterly, bi-annual, annual, real-time updates, as needed updates, event-driven updates, continuous updates)

As needed updates

Question 11. In relation to the draft principle that information should be standardised, how would you define "minimum data standards" for measuring and reporting environmental data? Would the Government's Environmental Reporting Guidelines provide an appropriate framework or can you suggest alternatives?

No response

Question 12. Please rank the following options for implementation of the principles based on your preference between 1 (most preferred) and 4 (least preferred)

No response

Question 13. For option 1, what is the likelihood that your organisation would participate in a consumer environmental information scheme that conformed to the principles if it were voluntary? (highly likely/likely/unlikely/highly unlikely/don't know

No response

Question 14. Would your organisation like to work with the CAA to pilot a consumer environmental information scheme?(yes/no/don't know)

No response

Question 15. Which, if any, of the following do you think are barriers to your organisation implementing such a scheme? (Please select from the list or specify "Other" with a brief explanation.) (technical difficulties/access to data/already using another system/cost/other)

No response

Question 16. When do you think any such scheme should commence? (2026/2027/later)

No response

Question 17. Does your organisation currently undertake any verification for your emissions data internally? (y/n/dk)

No response

Question 18. To what extent do you think there is value in implementing a verification requirement for $CO_2$ calculations for the information provided to passengers? (a lot/some/not much/none/dk)

A lot

In line with the consumer principle of information, it is important that the information provided to consumers is accurate and robust. In order to support this and the draft principle of being 'accountable and accurate' we would suggest that there would be benefit in implementing some kind of independent test, verification or audit, whether by the CAA or an external organisation, in order to assist with transparency and ensuring that the information provided to passengers is as accurate and clear as possible.

Question 19. Should environmental information be integrated into the global distribution system alongside ticketing and scheduling information?

No response

Question 20. Do you think that airlines or other relevant organisations should be required to publish CO2e data or CO2?

No response

Question 21. Recognising the current scientific uncertainty, do you agree or disagree that non-CO2 emissions should be included in the calculations and verification?

No response

Question 22. Is there anything else you would like to share or any additional comments you have regarding the topics discussed in this questionnaire?

Our most recent survey, conducted by YouGov on behalf of Consumer Scotland, included a number of questions on travel and tourism which provide some indication of the current level of consumer interest and engagement on the topic.

Our survey research found that, of those who go on holiday, 21% say that environmental concerns majorly or moderately influence their decisions regarding travel methods to the destination, with a further 17% stating that environmental concerns have a minor influence on their decision.[12]

Of those who had been on holiday, 51% of respondents stated that they would like to reduce the carbon emissions relating to their holidays. We asked those who stated that they would like to reduce their holiday-related emissions to rank the top three reasons why they had not taken more action to do so.[13] 41% of respondents to this question ranked 'not knowing how to choose holiday destinations with lower environmental impacts' as one of their top three reasons for not taking more action to reduce holiday-related carbon emissions.[14]

Our research found that while consumers are concerned about the environment, many report being unsure about what they need to do to help Scotland to reach net zero.[15] This demonstrates the potential benefits of the draft principles to improve the information available to consumers, increase transparency, improve choice and promote consumer confidence. The draft principles have the potential to provide consumers with clear and accurate information about the environmental impact of flights and facilitate a greater

ability for consumers to make an informed choice in line with their sustainability preferences.

[1] The James Hutton Institute (2023) Scotland's climate changing faster than predicted. Accessed at: https://www.hutton.ac.uk/scotlands-climate-changing-faster-than-predicted/

[2] Committee on Climate Change (2019) Net Zero – the UK's contribution to stopping global warming. Available at: https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf

[3] Consumer Scotland (2024) Consumer perceptions of and engagement with the transition to net zero. Available at: https://consumer.scot/publications/consumer-perceptions-of-and-engagement-with-the-transition-to-net-zero/

[4] Consumer Scotland (2024) Consumer perceptions of and engagement with the transition to net zero. Available at: https://consumer.scot/publications/consumer-perceptions-of-and-engagement-with-the-transition-to-net-zero/

[5] Competition and Markets Authority (2021) Guidance: making environmental claims on goods and services. Available at: https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services

[6] Deloitte (2023) What consumers need in order to adopt a more sustainable lifestyle. Available at: https://www2.deloitte.com/uk/en/pages/consumer-business/articles/sustainable-consumer-what-consumers-need.html

[7] Online travel agents are websites or online agencies that act as search engines to book travel and may offer package deals for consumers on elements of travel including accommodation, airfare, cruises, rental cars.

[8] Expedia (2023) Path to Purchase. Available at: https://partner.expediagroup.com/content/dam/unified/partner/documents/reports/2023-reports/path-to-purchase_en-gb.pdf

[9] Consumer Scotland (2024) Consumer perceptions of and engagement with the transition to net zero. Available at: https://consumer.scot/publications/consumer-perceptions-of-and-engagement-with-the-transition-to-net-zero/

[10] The Advertising Standards Authority (2022) Environmental Claims in Advertising. Available at: https://www.asa.org.uk/static/6830187f-cc56-4433-b53a4ab0fa8770fc/CCE-Consumer-Understanding-Research-2022Final-090922.pdf

[11] The Advertising Standards Authority (2022) Environmental Claims in Advertising. Available at: https://www.asa.org.uk/static/6830187f-cc56-4433-b53a4ab0fa8770fc/CCE-Consumer-Understanding-Research-2022Final-090922.pdf

[12] YouGov (2024) Consumer Scotland: Net Zero 2024. Available at: https://consumer.scot/media/g35ij55f/xm24-02-consumers-and-net-zero-net-zero-consumer-survey-yougov-final-report-pdf-version-for-publication.pdf

[13] YouGov (2024) Consumer Scotland: Net Zero 2024. Available at: https://consumer.scot/media/g35ij55f/xm24-02-consumers-and-net-zero-net-zero-consumer-survey-yougov-final-report-pdf-version-for-publication.pdf

[14] YouGov (2024) Consumer Scotland: Net Zero 2024. Available at: https://consumer.scot/media/g35ij55f/xm24-02-consumers-and-net-zero-net-zero-consumer-survey-yougov-final-report-pdf-version-for-publication.pdf

[15] Consumer Scotland (2024) Consumer perceptions of and engagement with the transition to net zero. Available at: https://consumer.scot/publications/consumer-perceptions-of-and-engagement-with-the-transition-to-net-zero/