



Edward Davey MP
Secretary of State
Department for Energy and Climate Change
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Dear Secretary of State,

I am writing to you on behalf of the United Nations Association of the UK (UNA-UK) to express concerns over the government's recent decision to exclude aviation fuel from the calculation of UK fuel consumption (as reported in the Guardian on 27 February 2012) in order to increase the likelihood that the government's commitment to obtain 15% of UK energy from renewable sources by 2015 will be met.

It is vital that the government encourages changes that result in a real reduction in overall emissions rather than adjusting calculation methods which result in the appearance of emission reductions. As has often been said, a ton of carbon emitted over China is the same as a ton of carbon emitted over the UK. It is therefore of great concern that the measurement of UK emissions excludes emissions linked to imported goods. As Damian Carrington reported in the Guardian on 8 February 2012 (Britain's greenhouse gas emissions in shock 3.1% rise), if the emissions linked to imported goods are included in the calculation, "the UK's carbon footprint has risen by 20%". This would indicate UK emissions are being exported rather than reduced.

It is notoriously difficult to control emissions 'downstream' at the level of millions of individual consumers. UNA-UK therefore supports a policy approach to target control of 'upstream' emissions, aiming at relatively few agents that extract fossil fuels from the ground. Such an approach eliminates the need to deal separately with aviation and shipping, and avoids the problem of where to attribute emissions associated with imported goods. There are various 'upstream' models, one of which is known as Kyoto2 (www.k2support.org).

The UK has already played a pioneering role in climate policy, being the first country to introduce a legally binding Climate Change Act. Such leadership should now be continued through the advocacy of an 'upstream' approach to controlling emissions. Such a system could be introduced initially with the EU Emissions Trading Scheme.

I would be most grateful for a response as to why aviation fuel has now been excluded from calculations of UK fuel consumption and to hear what the UK is planning to do on moving towards an 'upstream' approach to emissions control.

Kind regards

Phil Mulligan
Executive Director UNA-UK