easyJet and ETS Verification

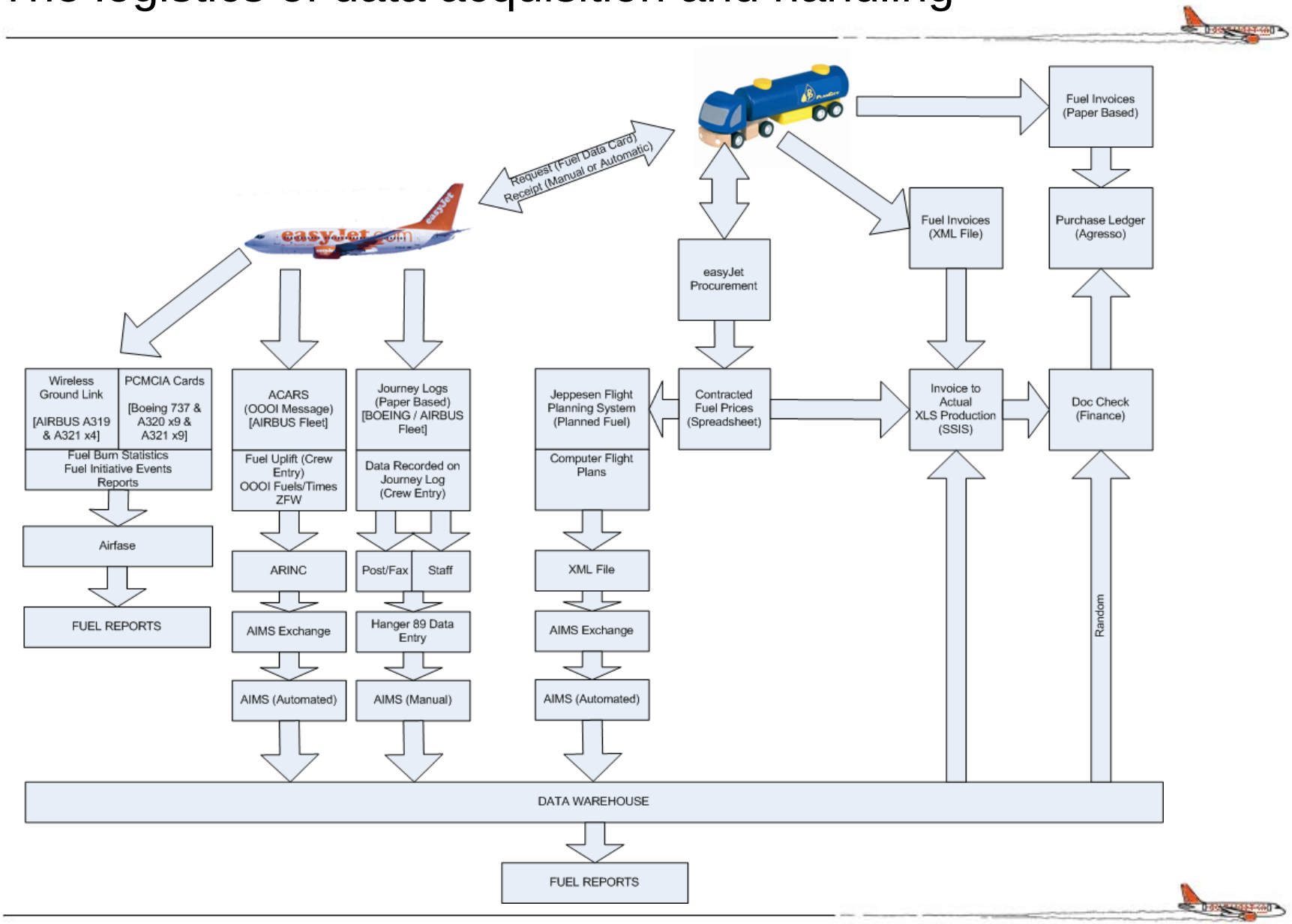
November 2008

easyJet carbon footprint

- **easyJet has grown to become Europe's fourth largest intra-European airline**
- **Business model is focused on one mission – shorthaul operations using '150' seater new technology aircraft in point-to-point markets**
- **Operating a distributed network across Europe**
  - **165 aircraft flying 43 million passengers per year**
  - **400 routes from 103 airports**
  - **operating 1000 flights per day in 26 countries**

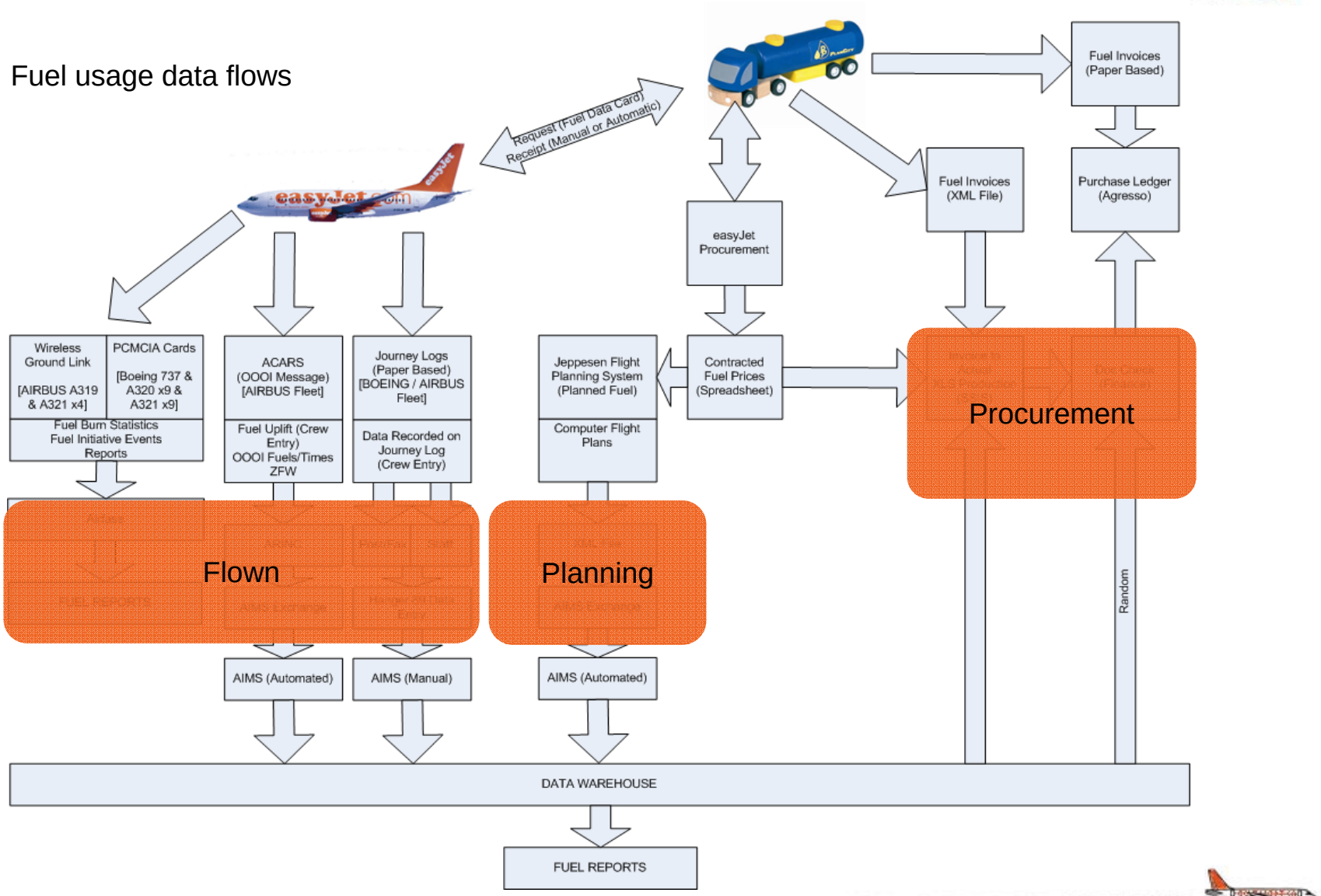
A carbon footprint of 3.7m tonnes of CO2 in 2007

The logistics of data acquisition and handling



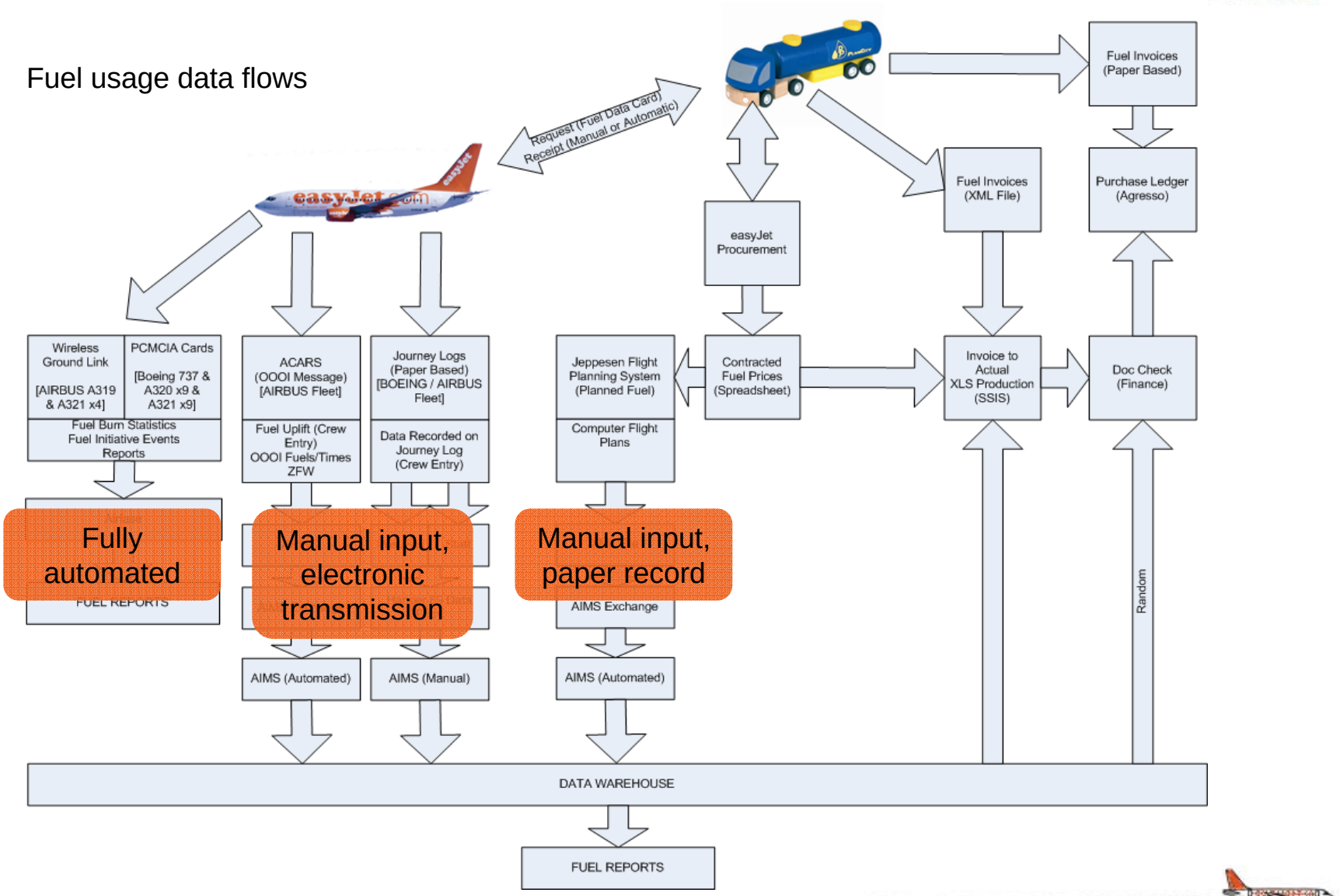
The logistics of data acquisition and handling… data sources

Fuel usage data flows



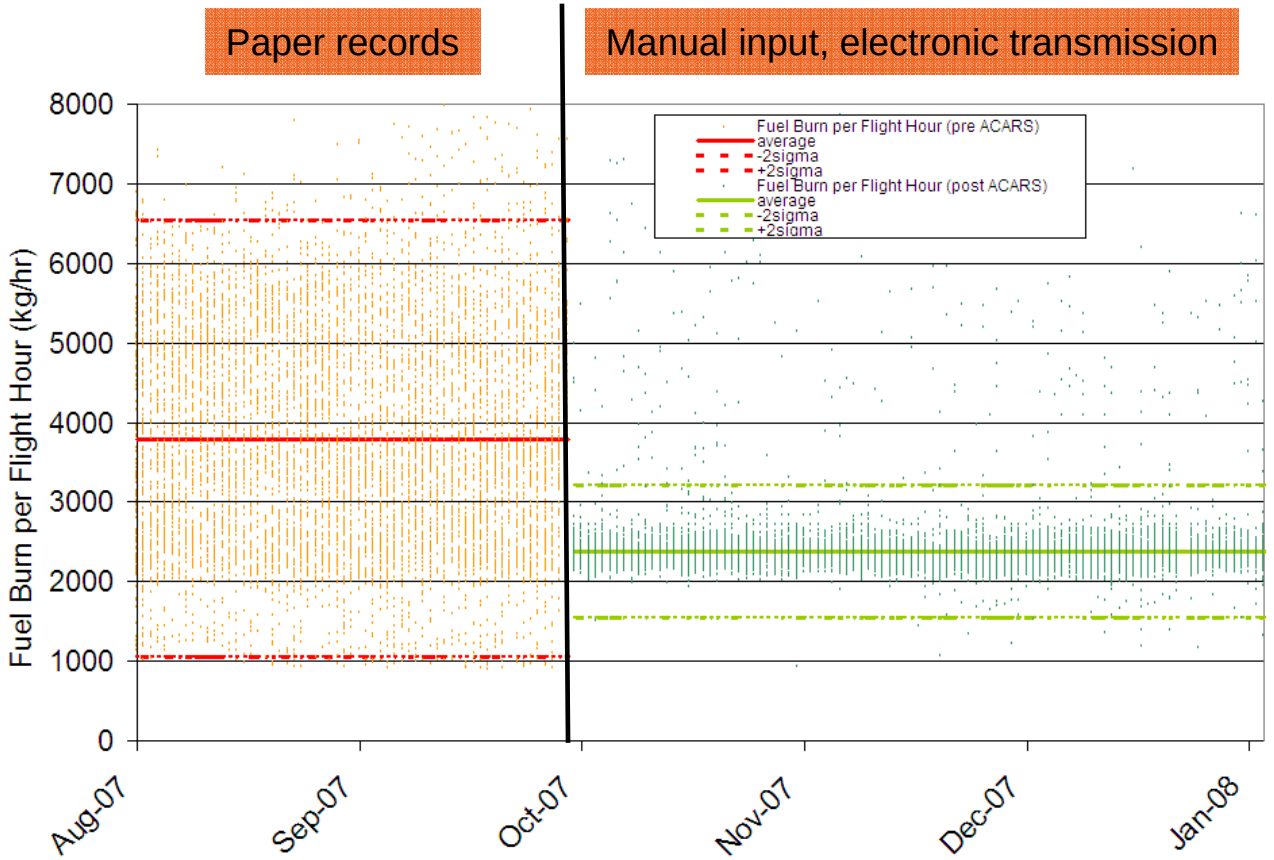
The logistics of data acquisition and handling… data capture

Fuel usage data flows



Data quantity and quality

The quality of data capture is related to both the volume of information and the system employed by the operator for capture



Emissions data capture and quality

- **Data capture from mobile sources creates a unique challenge for the inclusion of aviation into ETS**

- **The debate has so far focussed on the specifics of an individual flight and accuracy of fuel flow meters or weighing scales**
  - **These impacts are ‘de-minimis’ when compared to the data quality challenge of reporting from mobile sources**
  - **Aviation is a regulated safety industry - fuel flow meters are calibrated in order to be compliant with these regulations**

- **Investment in technology can address the challenge of data quality, but the cost burden is high:**
  - **Aircraft equipage**
  - **Robust communication systems**
  - **IT investment**

Monitoring plan and reporting

- **There is a need to strike a balance between the data required by the Verifier to verify (detailed) and the data reported (aggregate)**
- **Emphasis should be on verification at the operator level, similar to the auditing of financial accounts, rather than at the Competent Authority (CA) level**
- **The CA can establish an independent process of verification using data sources in the public domain**
- **Given the competitive and flexible nature of the industry, no value in forward looking information such as proposed flight routes**
- **Logistical nightmare, for no benefit, to report on measuring devices. Similarly, no benefit in reporting at aircraft or route level.**
- **The area of risk is in the logistics of reporting data from the plane to the ground**

Summary

- **A need for Verifiers to access a variety of sources of data:**
  - **Planning**
  - **Procurement**
  - **Flight actuals**

- **Keep it simple – adapt rules for stationary installations eg the source is the aircraft, not each individual engine or APU**

- **Standard datasets for airport co-ordinates, fuel densities, calorific values**

- **The CA should have a process of checking reporting, independent of the reports provided by operators**

- **On-going need for Verifiers to share learning's and develop best practice – drive quality, consistency and dependability of verification**