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Ref: TF/TF/D43/SI

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20 September 2019

Dear Sir/Madam,

### **Carbon Offsetting in Transport: a Call for Evidence**

Thank you for the opportunity to comment on the proposals for Carbon Offsetting in Transport. Taking your questions in turn:

#### *Questions 1*

- Q1. *Do you believe that greater information provision on journeys' carbon emissions would affect consumer behaviours? Would this lead to lower carbon choices? What evidence can you provide?*
- Q2. *What information regarding carbon emissions do you believe consumers should be provided with? How should this be provided? Where/when in the customer booking process should this be provided? Do you have evidence to support your view?*
- Q3. *Are travel providers already collecting information on the carbon emissions associated with journeys? If so, how is this information collected and reported? Does this vary across modes of transportation? Are they providing this information to passengers?*
- Q4. *To what extent are current energy use and emissions reporting and audit requirements sufficient in ensuring that travel companies have the right data to provide journey (and product) specific emissions information? Where they are not, what would be required?*

Our concern with the above questions is that they ignore private transport and the price of fuel, for example, the absence of fuel duty for air travel. Thus our roads are congested by private vehicles and public transport buses are delayed.

That said, the manufacturers of all private vehicles should provide pollution/carbon emission ratings for all vehicles and all public transport operators, including taxis and private hire vehicles, should provide carbon emission details for journeys carried out under different conditions, eg for buses, between rush hour and quiet times. This should be displayed prominently in the vehicles and on operators' websites.

#### *Questions 2*

- Q5. *Do you agree that offsetting journeys could play a role in tackling emissions, whilst transport is decarbonised? Can you provide evidence supporting your view?*
- Q6. *Do you agree with the offsetting principles outlined in the 'good quality' criteria within the UK's Environmental Reporting Guidelines? Are there any further elements - for instance with respect to geographic origin, eligible project types or the date that the offset was generated - that should be included to further strengthen the environmental integrity of any future scheme?*
- Q7. *How should any future carbon offsetting scheme correspond with existing schemes under which carbon emissions are accounted for, or reported, such as CORSIA or the EU ETS?*

- Q8. *What reporting requirements would be needed for any future scheme? How can these be designed so as to minimise additional burdens? Who should be in scope of requirements?*
- Q9. *How should any future carbon offsetting scheme be designed in order to support the objectives and requirements of the Paris Agreement, including the requirement to avoid the double counting of emission reductions?*

Our response to Question 5 is that yes, offsetting journeys could play a role in reducing emissions, but it is not a panacea and other measures must be taken to reduce travel that is emission-high. For example, frequent flyer inducements should be stopped so that there is no encouragement for that one extra journey.

We consider that the highest emitting transport options should be made the most difficult and also the most expensive. At the moment low cost air travel has a lot to answer for when it comes to carbon emissions, while the very sustainable option of rail travel remains far more costly. For example, while rail gives a city centre to city centre journey from Glasgow to London, people will travel out to airports near these two cities because the airfare is cheaper.

All offsetting schemes must adhere to strict, auditable guidelines and, while there are benefits in investing overseas, a set proportion of schemes must be local, to benefit the communities directly affected by high levels of travel.

### Questions 3

- Q10. *What examples currently exist to offset emissions from travel at the point where tickets are purchased? Can you provide examples of where this works well and where it does not?*
- Q11. *To what extent is there a role for Government in increasing the uptake of/mandating ticket providers offering offsets?*
- Q12. *More generally, how can the proportion of consumers taking up the option to offset emissions from their travel be maximised? Are there any other models for offsetting that should be considered?*
- Q13. *What role could behavioural insights have in improving the uptake of carbon offsetting options by passengers? Behavioural insights or behavioural science approaches apply insights based on an understanding of people's behaviours to real world issues to facilitate better public policy. Behavioural insight projects have been used across the public services to improve service outcomes.*
- Q14. *How could the mentioned potential issues of new carbon offsetting schemes be addressed? Are there any other issues in implementing the provision of carbon offsetting options at the ticket sale point? Please provide evidence.*

These questions are all based on public transport, which, apart from air travel, is generally more environmentally friendly than private motor traffic. While it may be deemed desirable for passengers to be able to offset their emissions this does put the onus on the responsible commuter who has already abandoned the private car for public transport to work. Such proposals are more appropriate for charter holiday traffic and, again, airline operators should be paying fuel tax and operating on a level playing field.

### Questions 4

- Q15. *Do you have views or evidence on the provision of carbon emissions information for non-ticketed travel? Do you have views or evidence on offsetting non-ticketed travel?*

This question, in our opinion, is the only one that attempts to address the main issue. Carbon offsetting, while it has its merits, is simply the sticking plaster. Far too many of us use private cars for one-person journeys, or to give others a lift or for very short journeys that could be done by foot or cycle. We propose that the following measures be taken:

- Robust low emission zones need to be established in our cities and towns, with all vehicles required to be compliant in relatively short timescales.
- Bus gates need to be established on busy streets to remove private vehicles and encourage bus travel.
- Public bus transport should be managed by the local authority rather than private operators.

- Routes should be introduced to where people live, even if they have been previously deemed uneconomic.
- Fares on buses should be reduced, or removed, to attack the fuel/transport poverty experienced by many in our society. People on low incomes currently feel obliged to buy a car because of the cost or non-availability of public transport.
- Bus lanes should operate 24 hours a day, not just at rush-hour or for part of the day
- Private cars must be excluded from city centres.
- Congestion charging should be considered where there are viable public transport alternatives.
- Good quality cycle lanes must be constructed along all radial routes into our towns and cities so that people have the option of cycling to work.
- Parking on pavements must be prohibited so that people may walk on them in safety and comfort.

It is only by addressing transport overall that we will reduce carbon emissions. Offsetting is one tool in the box but it should certainly not be our priority. We need a significant modal transfer from the private car to public and active travel to reduce pollution and improve public health.

Yours sincerely



Tricia Fort  
for Consultations, GoBike

#### Questions 5

- Q16. *Please tell us in what context you are responding:*

– e. Other (GoBike is a campaigning organisation comprising people who cycle and who wish to see good quality infrastructure for cycling. We are all volunteers and employ no staff)

- Q17. *Please tell us about your area(s) of particular expertise.*

GoBike is primarily interested in cycling, secondly we are interested in walking and thirdly in public transport.

- Q18. *If you are responding on behalf of an organisation please give us an indication of the following: – a. The size of the organisation or, if more applicable, the number of people or companies you are responding on behalf of; – b. The main business or activity of the organisation; – c. The region(s) of the UK in which your activity is predominately based (if you are active across the whole country then please answer 'UK').*

GoBike has members and supporters in the old Strathclyde area around Glasgow and we liaise with the UK and Scottish Governments, with Glasgow City Council and other Local Authorities around Glasgow to respond to consultations and to pressure them to provide good quality cycle infrastructure and to recognise that cycling is an effective and efficient form of transport.