

**SUBMISSION TO THE
GREENHOUSE AND ENERGY REPORTING
TASKFORCE ON THE REGULATIONS
DISCUSSION PAPER**



**DEPARTMENT OF THE ENVIRONMENT AND
WATER RESOURCES**

Introduction

Virgin Blue Airlines Pty Ltd (Virgin Blue) is committed to minimising any kind of environmental impact that our activities may have by implementing a range of initiatives that minimise greenhouse gas emissions and energy usage. To this end we have improved our efficiency by 13% in the last 5 years and we are continually implementing strategies and actions to further improve this.

Virgin Blue already operates Australia's youngest fleet of fuel efficient New Generation Boeing 737 and Embraer E-Jet aircraft, which improve fuel efficiency through technological and operational enhancements such as the installation of winglets, reducing aircraft weight, and improved flight planning.

As part of Virgin Blue's commitment to minimising environmental impacts, we have adopted an integrated approach to the 'greenhouse' issue by focusing on improving efficiency and reducing emissions through the implementation of a range of initiatives including:

- utilisation of a young fleet of fuel efficient aircraft;
- working with Government to address air traffic management to achieve more efficient aircraft routing and flight profiles;
- implementation of eco-efficiency initiatives in new and existing company premises;
- waste minimisation and recycling strategies for aircraft, airport terminals and offices; and the
- introduction of a "green" procurement system.

As an airline, we are well aware of the complexity of the challenge of meeting demand for air travel while working to reduce aircraft emissions at the same time. We believe we are taking steps in the right direction.

Specific Issues Raised in the *Regulation Discussion Paper*

Listed below are Virgin Blue's responses to specific issues of concern to us that have been raised within the *Regulation Discussion Paper* that may impact on our operations and procedures.

Chapter 2 – Question 5

“Is the aggregation of the emissions of several small facilities for reporting purposes practical?”

Virgin Blue believes that the reporting system under the Energy Efficiency Opportunities program, whereby a parent company can delegate the reporting obligation for an essentially separate corporate entity to that entity is a sound and effective system and would support the adoption of this system under the Regulations.

Chapter 2 – Question 6

“Is the proposed definition of facilities clear? If not, what would make it clearer?”

Given the dynamic and unique operations of airlines, by which aircraft take-off at one port in one State and land at a port often in another State (having flown over maybe one or two other State or Territories), Virgin Blue believes that the proposed definition of a facility has failed to take this type of operation into account.

Further Virgin Blue supports the national reporting of greenhouse gas emissions and is not in favour of state-based reporting. As stated above, aviation is a dynamic and unique industry that sees aircraft constantly crossing State and Territory boundaries, and any state-based reporting would be extremely difficult and onerous on business.

Virgin Blue believes that in the case of an airline, consideration should be given to allowing that airline to simply “register” a single facility for the purposes of reporting (ie a single airport or the location of their registered corporate office).

Chapter 6 – Disclosure of Information

Virgin Blue fully supports the publishing of all relevant corporate information pertaining to greenhouse gas emissions. In fact, Virgin Blue has voluntarily committed to publish this information within our Annual Reports.

Chapter 7 – Question 26

“What guidelines should there be covering the conduct of external audits and the preparation of audit reports?”

Given Virgin Blue’s membership of the Australian Greenhouse Office’s Greenhouse Challenge Plus and Greenhouse Friendly programs as well as having a statutory obligation to report under the Energy Efficiency Opportunities program, we believe that consideration should be given to a single integrated external auditing process that verifies the data and information required to meet the statutory and program obligations of all Government programs and legislation.

Such an approach would simplify reporting requirements, ensure consistency and reduce the administrative burden, complexity and cost on business.