

1) Written Representations (REP1-095)

1) Post-submission consolidation of our documents caused indexing in the Written Rep and its Appendix to drift, horizontal black lines to appear in the text, and some headings to be separated from text.

2) A document reference and two charts were inadvertently omitted from page 8 paragraphs 44, 45 & 47. The paragraphs are shown here with the missing items in place. Paragraph wording is unchanged:

44. The available evidence suggests that even if the mid-range carbon prices assumed in Jet Zero are achieved, they may be insufficient to drive investment in technology and SAF at the pace required. Using the costs identified for removals in EE’s report for BEIS, and taking the midpoint of the costs for SAF pathways calculated by McKinsey in its Clean Skies for Tomorrow report (<https://www.mckinsey.com/~media/mckinsey/industries/travel%20transport%20and%20logistics/our%20insights/scaling%20sustainable%20aviation%20fuel%20today%20for%20clean%20skies%20tomorrow/clean-skies-for-tomorrow.pdf>), the CORSIA price in most cases exceeds the abatement cost for SAF and removals only from the 2040s onwards.
45. Comparison of CORSIA mid prices and likely abatement costs 2020-2050 (red indicates that carbon prices are unlikely to be sufficient to encourage uptake and investment, green indicates that prices are likely to be higher than abatement costs)

	CORSIA mid £/CO2	SAF PtL £/CO2	SAF HEFA £/CO2	Removals POWER BECCS £/CO2	Removals DACCS £/CO2
2020	3	852	340		
2030	6	511	316	120	300
2040	132	341	304	110	215
2050	378	304	292	100	130

46. The assumed UK ETS mid-price performs better given its more rigorous framework, although prices are again unlikely to exceed SAF abatement costs until the 2040s.

47. Comparison of UK ETS mid prices and likely abatement costs 2020-2050 (red indicates that carbon prices are unlikely to be sufficient to encourage uptake and investment, green indicates that prices are likely to be higher than abatement costs)

	UK ETS (mid price) £/CO2	SAF PtL £/CO2	SAF HEFA £/CO2	Removals POWER BECCS £/CO2	Removals DACCS £/CO2
2020	21	852	340	No data	No data
2030	150	511	316	120	300
2040	264	341	304	110	215
2050	378	304	292	100	130

2) LADACAN comments: Further Deadline 1 Submissions (REP-2 ref not yet known)

The start of the Executive Summary on page 3 should be amended as shown below:

1. Executive summary

This document responds to:

- ~~LR Commentary on the Overarching Aviation Noise Policy Statement (REP1-012)~~
- ~~Role and Responsibilities of Luton Borough Council (REP1-018)~~
- Comments made by the Applicant on RRs (REP1-020 and REP1-023)