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Centre for Sport, Leisure and Tourism

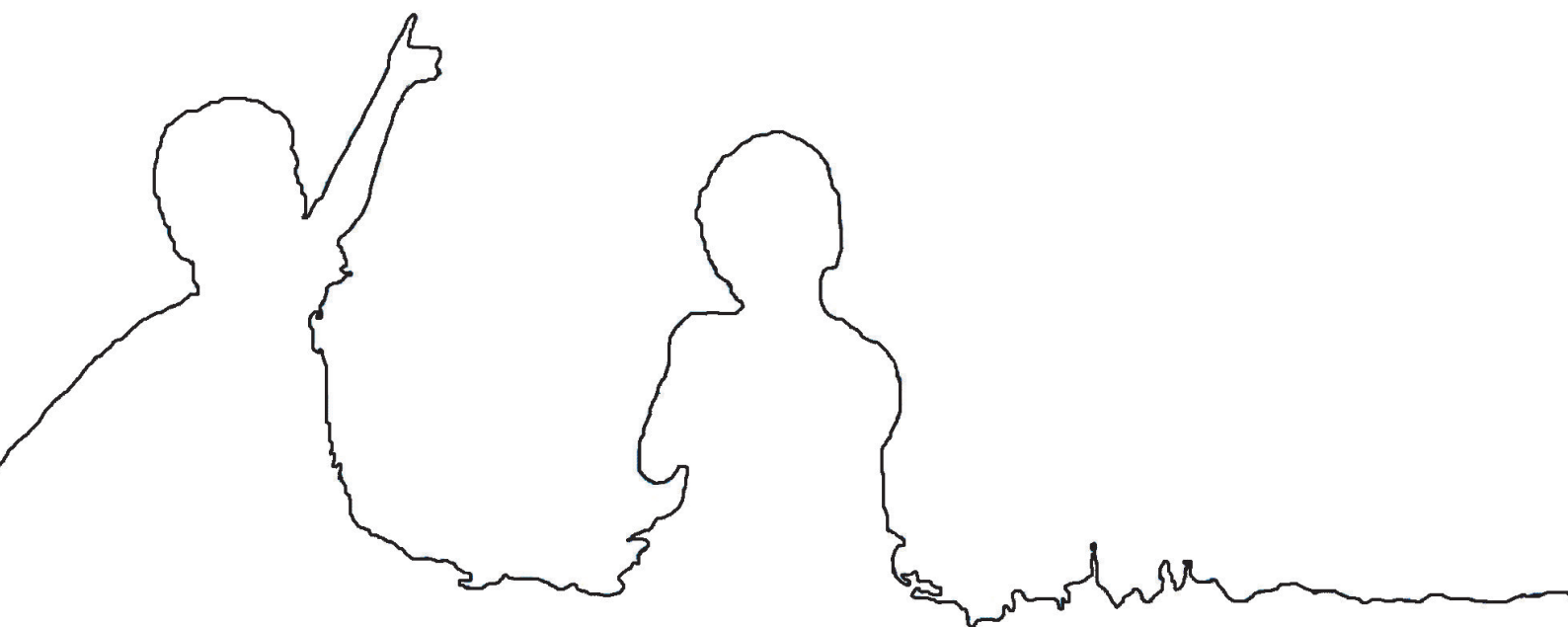# Sustainable Development, Corporate Social Responsibility and Aviation in the UK: Connecting Policy Perspectives

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There has been much public discourse and debate on the emergence of low-fares airlines (LFAs, also known as low cost carriers) such as Ryanair, easyJet and Flybe flying to and from the United Kingdom. Much of this has centred on their contribution to sustainable development, specifically about their environmental impacts. However, in this regard, views of LFA operations that are fully-informed by both internal and external perspectives have been lacking.

Aviation and CSR

Corporate social responsibility (CSR) is an approach to business management that offers the potential for businesses to voluntarily deliver on commitments to sustainable development while avoiding the need for more formal regulation. Encouraging CSR across all business sectors is a policy concern of both the EU and the UK. However, policymakers do not appear to be actively encouraging CSR among airlines.

Aims of the report

Conditions in the external business environment, such as the prevailing public policy agenda, can frame and drive decisions about CSR implementation and development. To date, there has been no examination of policy in the areas of sustainable development, CSR and aviation, nor the extent to which they are connected and mutually-reinforcing.

The aim of this report is to review recent policy documents produced by the EU and in the UK and its regions since 2000 pertaining to these three areas. In particular, it sets out to:

- Review the latest policy position in each area separately; and
- Investigate whether policy connections are made between them.

This report is the first output of a programme of work funded by the Economic and Social Research Council (ESRC) in the UK under the title *Social Responsibility among Low-fares Airlines: Current Practices and Future Trends* (RES 185-3-0046). The main research for this report was conducted from August to November 2008.

Main findings

Policy in the three areas of sustainable development, CSR and aviation has been siloed for the most part, with only a very limited level of linkage between them. This is despite the convenient connections that are made in public discourse.

The limitations of current policy statements are evident in so far as:

- CSR and sustainable development have not been linked beyond a somewhat superficial conceptual level.
- CSR policy at the EU and UK level has not developed significantly in recent years, and CSR is largely absent as a policy consideration or aspiration at the regional level.
- Aviation is tacitly recognised in EU and UK sustainable development policy, but only environmental impacts and the Emissions Trading Scheme are emphasized.
- Aviation policy recognises the importance of sustainable development but CSR is not identified or encouraged as a means by which to deliver this.

Implications

This review raises four major issues of relevance to policymakers and practitioners for the future development and implementation of CSR among LFAs:

- CSR strategies among LFAs flying to and from the UK must, out of necessity, be informed by a complex array of policy statements pertaining to CSR and sustainable development.
- Future policy towards more sustainable aviation must fully acknowledge and integrate the 'triple bottom line' *and* encourage greater CSR.
- CSR offers an alternative means to facilitate more sustainable futures in the sector, but it has to be appropriately encouraged by complementary EU and UK policy.
- Opportunities exist to seize the initiative and to encourage greater adoption of CSR in the LFA sector, thereby obviating the need for formal regulation.

Linking Aviation, CSR and Sustainable Development

1.1 Background

Corporate social responsibility (CSR) is an approach to business administration that appears to be a policy goal for the United Kingdom government (DTI 2004) as well as for the European Union (CEC 2001a). Although there are differing approaches to the definition and practical implementation of the term (Blowfield and Murray 2007; Dahlsrud 2008), CSR is essentially a voluntary approach to business administration that recognises the needs of the community and environment and strives to benefit them, both now and in the future, while maintaining profitable and sustainable operations.

One advantage of CSR for supra-national and national governments is its voluntary nature. In times of neo-liberal governance, the adoption of CSR by business avoids the need to legislate to achieve more responsible management. Business is perceived to be able to introduce change much faster than sovereign states (Falck and Heblich 2007). Moreover, each sector is different and a wide array of definitions allows greater flexibility and avoids the need for restrictive 'one size fits all' solutions. Strategy and context for a range of businesses working within a sector will, almost inevitably, vary (Holton *et al* 2008). Furthermore, in the case of aviation and other sectors that are governed by a series of international conventions, agreements and the like, greater self-regulation avoids the need for highly contested local regulation.

The links with sustainable development are a further advantage, with the latter typically being described as 'development that meets the needs of the present without compromising the ability of future generations to meet their own needs' (UNWCED 1987). In both CSR and sustainable development, a responsible attitude to management and governance that is proactive, voluntary and cognisant of short-term as well as long term issues is to be encouraged. Indeed, CSR is now considered a vital component in delivering sustainable development within business. CSR plays a key role in ensuring that the economic, social and environmental impacts (the so-called 'triple bottom line')

resolve in favour of as many stakeholders internally and externally as possible.

Recent public debate and discourse conducted through the popular media have considered the social responsibility of airlines and their role in delivering sustainable development. One dimension of the discussion has been the contribution of aviation to climate change (Stern 2007; UNWTO 2007). Low-fares airlines (LFAs, such as Ryanair, easyJet and Flybe) in particular have come under the spotlight for their allegedly damaging contribution to increased greenhouse gas emissions (Cairns and Newson 2006). However, some positive social impacts have also been acknowledged. Leisure travellers from varied socio-economic backgrounds have taken the opportunity to fly and more frequently to otherwise previously inaccessible destinations (Surrey 2007). LFAs have also become popular among business travellers, as they have connected markets and encouraged inward investment. Indeed, some commentators have argued that, from an economic or socio-cultural perspective, LFAs contribute positively towards the sustainable development of regions from and to which they fly (ELFAA 2004; York Aviation 2007).

Debate on the relationship between low-fares aviation and sustainable development is, therefore, characterised by two important features. First, published positions tend to present arguments mainly focused on a single dimension of sustainability rather than across the full 'triple bottom line'. Thus, commentaries on LFAs as they relate to sustainable development in the UK tend not to take holistic, balanced or fully-informed views. Furthermore, most examine sustainable development in the external environment and tend to be limited by partial knowledge of how internal practices and processes within LFAs may contribute.

A second feature is that there have been no previous attempts to examine how public policy in the United Kingdom (UK) or European Union (EU) connects between the three areas of aviation, sustainable development and corporate social responsibility. Clearly this is an important oversight. CSR is a voluntary approach and a preferred form of self-regulation for business; it is encouraged as a means of promoting and delivering sustainable development; and more sustainable aviation would appear to be a policy priority.

1.2 Partnership research: business and higher education

This report is an outcome of an award made by the Economic and Social Research

Council (ESRC, www.esrc.ac.uk) in the United Kingdom as part of its Business Engagement Scheme under the title *Social Responsibility among Low-fares Airlines: Current Practices and Future Trends* (RES 185-3-0046). Among the aims of the Business Engagement Scheme are to:

- Promote the transfer and exchange of knowledge between social science researchers and business sectors and staff within them;
- Respond to the knowledge needs of business;
- Expand networks for business sectors into academia and vice versa; and
- Provide business sectors with research-informed evidence to develop and review operational and management practices.

The research on which this report is based was conducted by the Centre for Sport, Leisure and Tourism Research (www.exeter.ac.uk/slt) in the University of Exeter Business School in partnership with the regional airline, Flybe (www.flybe.com). The period of the collaboration was 1 August 2008 to 31 July 2009.

The University of Exeter team comprised Prof Tim Coles, Dr Claire Dinan, and Emily Fenclova, while Niall Duffy, Head of PR and Public Affairs, supported the work at Flybe. The opinions expressed in this report are those of the research team alone and do not necessarily reflect those of the ESRC, University of Exeter or Flybe.

1.3 The reporting context

The primary aim of this research programme as a whole has been to understand CSR among LFAs flying to and from the UK. Its main outcome is an enhanced understanding of the implementation of CSR by LFAs, as well as issues related to the future development of CSR-related activity in this sector.

This is the first in a series of three reports to be published from the programme, and all three should be read in conjunction. The second report examines through documentary analysis and a series of interviews with CSR managers the current CSR practices among LFAs as well as the prospects for future CSR activity. The third report explores the main business issues that are likely to influence the further development and implementation of CSR in the LFA sector.

1.4 The aim of this report

CSR is a voluntary, self-regulatory approach to business; however, businesses and organisations do not exist in isolation and conditions in the external business environment, such as the public policy agenda and fluctuating macro-economic conditions, can frame and shape decisions. This report reviews recent policy documents produced by the EU and in the UK and its regions on sustainable development, CSR and aviation. In particular, it sets out to:

- Review the latest policy position in each area separately; and
- Investigate whether linkages are made between them.

1.5 Further terms of reference

This review covers policy documents produced on these topics from 2000 onwards. The main research for this report was conducted from August to November 2008 and updated in Spring 2009. As EU policy is a major driver for UK policy in these three areas, it is examined in this review.

Policy analysis on topics like CSR, sustainable development and aviation can include policy documents directly on the topic, as well as policy pertaining to the topic (Hall 2008). We searched for CSR, sustainable development and aviation policy documents *per se* in the first instance. Despite their purported importance, these themes are often included in policy documents of much wider or different scope which is especially the case at the regional level.

Policy on Sustainable Development

2.1 Policy toplines

- Explicit sustainable development strategies have been produced by the European Commission, the United Kingdom and all of the 12 UK regions (including Scotland, Wales and Northern Ireland).

- There is a general consensus on the definition and desirability of sustainable development, as well as general goals for developing in a sustainable manner.

- However, CSR — and aviation-related sustainability goals vary in specificity, from explicit (but brief) aviation and CSR goals in the European Commission's sustainable development strategy to their almost-universal omission from regional sustainable development strategies within the UK.

2.2 EU policy on sustainable development

The EU's sustainable development objectives were first outlined in the *Treaty of Amsterdam* in 1997. While 'sustainable development is to be integrated into policy-making at all levels' (CEC 2006a: 6), the European Commission's Directorate-General for the Environment supports the online dissemination of the sustainability objectives through its website, http://ec.europa.eu/environment/eussd/ (CEC 2008a).

The most recent statement, the *Renewed EU Sustainable Development Strategy*, was adopted in 2006 (CEC 2006a). It expands upon the earlier policy goals and more specifically addresses threats to 'economic growth, social cohesion and environmental protection' that were first identified in *A Sustainable Europe for a Better World: A European Union Strategy for Sustainable Development* (CEC 2001a: 2).

The *Renewed EU Sustainable Development Strategy* (2006a: 2) defines sustainable development as:

> 'the needs of the present generation should be met without compromising the ability of future generations to meet their own needs'.

More specifically, sustainable development 'is about safeguarding the earth's capacity to support life in all its diversity and is based on the principles of democracy, gender equality, solidarity, the rule of law and respect for fundamental rights' (CEC 2006a: 2). It 'promotes a dynamic economy with full employment and a high level of education, health protection, social and territorial cohesion and environmental protection in a peaceful and secure world, respecting cultural diversity' (CEC 2006a: 2). There are four key objectives:

- environmental protection,
- social equity and cohesion,
- economic prosperity, and
- meeting international responsibilities (2006a: 3-4).

Additionally, there are ten 'policy guiding principles':

- promotion and protection of fundamental rights,
- solidarity within and between generations,
- open and democratic society,
- involvement of citizens,
- involvement of businesses and social partners,
- policy coherence and governance,
- policy integration,
- use best available knowledge,
- precautionary principle, and
- make polluters pay (CEC 2006a: 4-5).

Between EU Member States, implementation of the EU's sustainable development goals varies. A report for the European Commission's Secretariat General found that four of the 27 Member States did not yet have a working sustainable development policy. Moreover, of the member states that already had sustainable development policies, only six addressed all of the EU's sustainable development objectives (one of which was the UK) (ECORYS Nederland BV 2008).

The *Renewed EU Sustainable Development Strategy* (2006a) mentions both corporate social responsibility and aviation. The fifth policy principle, 'involvement of businesses and social partners', urges for the enhancement of 'social dialogue, corporate social responsibility and private-public partnerships' with the goal to 'foster cooperation and common responsibilities to achieve sustainable consumption and production' (CEC 2006a: 5).

With respect to airlines, the *Renewed Strategy* exceeds *A Sustainable Europe* in advising that aviation be included in the Emissions Trading Scheme, as well as mandating the exploitation of 'cost-effective emission reduction options for cars and aviation' (CEC 2006a: 9).

2.3 UK policy on sustainable development

Sustainable development policy in the UK has not been updated to reflect the *Renewed EU Sustainable Development Strategy* (CEC 2006a). Produced a year before it, *Securing the Future: Delivering UK Sustainable Development Strategy* (HMG 2005: 11) states that 'all central Government departments and their executive agencies will produce focused sustainable development action plans'.

In practical terms, the following departments were specifically identified as playing a role in achieving the government's sustainability goals:

- the Department for Transport (DfT);
- the Department for Environment, Food and Rural Affairs (Defra),
- the Environment Agency,
- HM Treasury,
- the Department of Trade and Industry (DTI) — (now replaced by the Department for Business, Innovation and Skills (BIS)),
- the Department for Culture, Media and Sport (DCMS),
- the Department of Health (DH),
- the Department for Education and Skills (DfES) — (now replaced by the Department for Children, Schools and Families (DCSF) and BIS), and
- the Office of the Deputy Prime Minister (ODPM).

The Sustainable Development Commission (http://www.sd-commission.org.uk) independently advises the government on sustainable development. Another prominent partner in implementing sustainable development is Business in the Community (BitC), although its work relates almost exclusively to CSR and will be discussed in Section 3.

The reorganisation of government departments has resulted in the Department for Business, Innovation and Skills (BIS) taking over many of the Department of Trade and Industry's (DTI) sustainable development roles. It should also be noted that some, but not all, of the DTI's sustainable development-related publications are available on BIS's website.

Securing the Future (HMG 2005) provides more detail to the goals outlined in *A Better Quality*

of Life: Strategy for Sustainable Development for the United Kingdom (HMG 1999). According to *Securing the Future* (HMG 2005: 16), sustainable development should:

> 'enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations'.

Securing the Future (HMG 2005: 15) maintains the four central aims of *A Better Quality of Life* (HMG 1999), namely:

> 'social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; and maintenance of high and stable levels of economic growth and employment'.

In addition to these, the UK Government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration have agreed to five guiding principles which are comparable, but not completely aligned to the EU's 2006 sustainable development principles (HMG 2005: 16):

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

Securing the Future (HMG 2005: 20) pledges a commitment to the EU's sustainable development goals of tackling 'climate change, natural resource protection, sustainable transport, ageing population, public health and the global dimension of sustainable development'. It supports *A Sustainable Europe for a Better World: A European Union Strategy for Sustainable Development* (CEC 2001), but urges for a review that would encourage

> 'an innovative, highly competitive, resource efficient, low carbon economy that provides an excellent quality of life for all its citizens and a mutually beneficial relationship with its trading partners […] achieved in harmony with the protection of human health and the environment' (HMG 2005: 20).

These concerns are addressed somewhat through the definition of sustainable development in the *Renewed EU Sustainable Development Strategy* (CEC 2006a), though the influence of the UK in the definition is unclear.

The UK is one of the six countries identified as having a national sustainable development policy that addresses all of the sustainable development goals of the European Commission (ECORYS Nederland BV 2008). This is although the latest UK policy predates that of the EU. In regard to sustainable development policies, the carbon emissions reduction plan in the *Climate Change Act 2008* (HMG 2008) is identified as an exemplary example of adherence to, and the advancement of, the European Commission's sustainable development goals (ECORYS Nederland BV 2008).

Both CSR and aviation are mentioned in *Securing the Future.* It calls for the 'launch of a new Government Corporate Social Responsibility (CSR) website outlining Government support for CSR' [formerly hosted at http://www.csr.gov.uk, now no longer available] and the establishment of a 'CSR Academy to support skills development' in CSR (HMG 2005: 41). Furthermore, it recognises that CSR 'must extend throughout [business] supply chains' (HMG 2005: 46).

With respect to airlines, *Securing the Future* refers several times to the DfT's *The Future of Air Transport: White Paper* (2003), but seems solely concerned with the aviation industry's emissions and briefly advocates 'aviation joining the EU emissions trading scheme by 2008' as a 'top priority' (HMG 2005: 86).

2.4 UK regional sustainable development policy

As Table 2 shows, all of the nine regions of England (including London) have explicit sustainable development policies. Scotland, Wales and Northern Ireland each have their own sustainable development policies.

Most of the regions have a dedicated, separate sustainable development policy strategy. Three of the four documents published in 2008 (North East, East Midlands, and Yorkshire and Humber) do not call themselves a sustainable development strategy and instead are titled as an 'Integrated Regional Strategy' or 'Integrated Regional Strategy Framework' (essentially a regional development strategy with sustainable development goals integrated throughout).

Although included in *Securing the Future*, the devolved governments of Wales, Scotland and Northern Ireland have produced their own sustainable development strategies: *Starting to Live Differently: The Sustainable Development Scheme of the National Assembly for Wales* (National Assembly for Wales 2004), *Choosing Our Future: Scotland's Sustainable Development*

Table 1: 'Sustainable development policy and strategy' in the UK regions

Region	Sustainable Development Policy	Published
East of England	*A Sustainable Development Framework for the East of England*	2001
East Midlands	*Integrated Regional Strategy Framework*	2008
London	*A Sustainable Development Framework for London*	2003
North East	*Sustaine: The Integrated Regional Framework for the North East of England*	2008
North West	*Implementing Action for Sustainability: An Integrated Appraisal Toolkit for the North West*	2003
South East	*The South East Regional Sustainability Framework: Towards a Better Quality of Life*	2008
South West	*An Eye to the Future: Promoting Sustainable Development*	2007
West Midlands	*Future Advantage: Sustainable Development and Action Plan 2006-2010*	2006
Yorkshire & Humber	*Growing Together: Integrated Regional Framework*	2008
Northern Ireland	*First Steps Towards Sustainability: A Sustainable Development Strategy for Northern Ireland*	2006
Scotland	*Choosing Our Future: Scotland's Sustainable Development Strategy*	2005
Wales	*Starting to Live Differently: The Sustainable Development Scheme of the National Assembly for Wales*	2004

(Sources: full bibliographical details provided in the reference list)

Strategy (The Scottish Government 2005), and *First Steps Towards Sustainability: A Sustainable Development Strategy for Northern Ireland* (Northern Ireland Government 2006). Of the three devolved governments' strategies, the most recent, *First Steps Towards Sustainability* (Northern Ireland Government 2006) is the longest at 46,429 words over 176 pages and has the most comprehensive plan with very specific indicators. On the other hand, the oldest strategy, *Starting to Live Differently* (National Assembly for Wales 2004), is considerably shorter at 3,678 words over 18 pages and deals with the more general arguments for sustainable development.

Most of the regional sustainable development documents present general policy and strategy statements. Few have specific indicators, and few address *specifically* either CSR or aviation. The North East's (Sustaine 2008) includes CSR as a potential means to deliver sustainable development goals. Only one other region, the West Midlands, includes a short case study of Carillion plc, a construction company, as an example of how private businesses recognise the importance of sustainability and corporate responsibility (Advantage West Midlands 2006).

Similarly, while all of the sustainable development strategies mention transport in general, the aviation industry is largely overlooked as a separate concern. One of the few exceptions is the East of England, which lists '[r]educing air pollution, including CO_2 emissions, from road and air transport' as one of its main sustainable development challenges (EERA 2001: 9).

Corporate Social Responsibility Policy

3.1 Policy toplines

- Both the European Commission and the United Kingdom have specific strategies for encouraging corporate social responsibility, although both recognise that CSR is necessarily voluntary.
- The European Commission and the UK strategies both cite CSR as a key delivery mechanism for sustainable development.
- None of the twelve UK regions (including Scotland, Wales and Northern Ireland) has produced specific CSR strategies.
- The role of CSR is largely overlooked in regional sustainable development strategies but most regional *economic* strategies mention general goals of encouraging CSR.

3.2 The EU position on CSR

The European Commission's Directorate-General for Enterprise and Industry and the Directorate-General for Employment and Social Affairs oversee corporate social responsibility-related legislation.

Implementing the Partnership for Growth and Jobs: Making Europe a Pole of Excellence on Corporate Social Responsibility (CEC 2006b) is the European Commission's most recent corporate social responsibility policy document. Most notably, it announced the launch of the business-led European Alliance on CSR to improve the implementation of the CSR goals outlined in *Green Paper: Promoting a European Framework for Corporate Social Responsibility* (CEC 2001a) and refined in *Corporate Social Responsibility: A Business Contribution to Sustainable Development* (D-GESA 2002).

CSR is defined by the European Commission as 'a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis' (CEC 2006b: 5).

The European Commission leaves CSR encouragement largely to the discretion of member states. Thus, the 'precise nature and characteristics' of CSR 'vary between different national and cultural contexts', although it contends there is a 'broad consensus in Europe about the definition of CSR' (CEC 2006b: 7).

A comprehensive review of each Member State's CSR legislation and activities found that the 'broad consensus' consisted of objectives to increase voluntary stakeholder dialogues and public-private partnerships; increasing awareness, knowledge and recognition of best practices; and 'ensuring a more solid and consistent link between sustainable development objectives and public policies' (CEC 2007: 2).

CSR is seen as an integral component of sustainable development, especially in regard to sustainable economic growth and the creation of more and better jobs; *Implementing the Partnership for Growth and Jobs* positions itself as a natural extension of the European Commission's sustainability policies, especially the *Renewed EU Sustainable Development Strategy* (CEC 2006a). It is also recognised that there is a need for 'more interdisciplinary research' on the relationship between CSR, competitiveness and sustainability (CEC 2006b: 7).

Neither of the European Commission's two CSR policy documents directly refers to aviation. In regard to CSR, the European Commission differentiates between businesses based on size, rather than type. The exceptions are the few industry-based case studies in the *Green Paper* (CEC 2001a), which reference steel, coal and shipbuilding, as well as highlighting industry-specific schemes in Member States for office equipment manufacturers, petrochemical and chemical companies, financial corporations, and the textile, oil and gas industries.

3.3 UK government policy on CSR

The Department of Trade and Industry (DTI) was the initial government department with corporate social responsibility in its remit. Most of the DTI's CSR responsibilities were transferred to the Department for Business, Enterprise and Regulatory Reform (BERR). BERR has since been amalgamated into the Department for Business, Innovation and Skills (BIS), which, at the time of writing, hosts very limited information about the government's position on CSR. The not-for-profit organisation, Business in the Community (BitC), has been given responsibility for implementing some of the DTI's CSR programmes, such as the CSR Academy (BitC undated).

The most recent UK Government CSR policy is *Corporate Social Responsibility: A Government Update* (DTI 2004). *Corporate Social Responsibility* superseded *Business and Society: Corporate Social Responsibility Report* [no longer available] and *Business and Society: Developing Corporate Social Responsibility in the UK* [no longer available] (Article 13 2003). The DTI also published an overview of the international implications of *Corporate Social Responsibility* (DTI 2004) entitled *Corporate Social Responsibility: International Strategic Framework* (DTI 2005).

From a legislative perspective, Section 417 of the *Companies Act 2006* (HMG 2006b) mandates that quoted companies must also report on environmental matters, employees, and social and community issues, although specific measurements and indicators are not required.

Corporate Social Responsibility (DTI 2004: 2) defines CSR as 'businesses taking account of their economic, social and environmental impacts, and acting to address the key sustainable development challenges based on their core competences wherever they operate – locally, regionally and internationally'.

Consistent with the EU's definition of CSR, the UK Government (DTI 2004: 4) believes that 'CSR should continue to take compliance with legal requirements as the base and go beyond that', and it sees CSR as an integrated business motivation.

Corporate Social Responsibility (DTI 2004: 2) outlines six over-arching aims that it claims support 'the Government's strategy for sustainable development':
- Promote business activities that bring simultaneous economic, social and environmental benefits;
- Work in partnership with the private sector, community bodies, unions, consumers and other stakeholders;
- Encourage innovative approaches and continuing development and application of best practice;
- Ensure we have decent minimum levels of performance in areas such as health and safety, the environment and equal opportunities;
- Encourage increased awareness, open constructive dialogue and trust; and
- Create a policy framework which encourages and enables responsible behaviour by business.

Additionally, *Corporate Social Responsibility* (DTI 2004: 5) outlines progress to date on six compatible 'delivering objectives':

- competitiveness,
- poverty reduction,
- community investment,
- environment,
- governance, and
- workplace.

Within these objectives, specific, voluntary government programmes, which should encourage CSR, are described, such as Strategic Partnerships, flexible working schemes, green labelling schemes and Business in the Community's DTI-sponsored (at the time) *Corporate Responsibility Index*. The government's CSR website, csr.gov.uk, is also introduced; though as noted above, it is no longer available online.

Now five years old, *Corporate Social Responsibility* positions itself as a policy response to the UK government's commitment to 'promote CSR' at the World Summit on Sustainable Development in Johannesburg in 2002. In regard to the EU, *Corporate Social Responsibility* anticipates the publication of a European Commission-created White Paper on CSR in 2004 (which was never published) and commits to actively supporting the European Commission's CSR goals. *Corporate Social Responsibility* also notes that the EU's Eco-Management and Audit Scheme (EMAS) is increasingly the preferred Environmental Management System and applauds the EU's European Eco-Labelling scheme.

A review of the CSR policies of EU Member States (CEC 2007) was complimentary of the UK's efforts; however, it should be noted that many of the initiatives that were recognised, such as csr.gov.uk and the creation of a UK Minister for Corporate Social Responsibility, have since been abandoned. Additionally, the latest UK policy on CSR was published two years before the most current EU's CSR policy. There seems to be no update for *Corporate Social Responsibility* in consultation, so there appears to be a lapse in CSR policy dialogue between the UK and the EU.

3.4. CSR in the UK regions

As Table 2 shows, none of the regions in the UK has an explicit CSR policy (or strategy). The most recent regional development strategy and/or the regional economic strategy for each of the regions, including London and the devolved governments of Scotland,

Table 2: 'Corporate social responsibility policy and strategy' in the UK regions

Region	Separate CSR Policy	Alternative Relevant Document	Year Published
East of England	x	*Inventing Our Future: Collective Action for a Sustainable Economy*	**2008**
East Midlands	x	Not in Regional Economic Strategy	**x**
London	x	*Sustaining Success: Developing London's economy—Economic Development Strategy*	**2005**
North East	x	*Leading the Way: Regional Economic Strategy 2006-2016*	**2006**
North West	x	*Northwest Regional Economic Strategy*	**2006**
South East	x	*The Regional Economic Strategy 2006-2016: A Framework for Sustainable Prosperity*	**2006**
South West	x	*Regional Economic Strategy for South West England 2006-2015*	**2006**
West Midlands	x	Not in Regional Economic Strategy	**x**
Yorkshire & Humberside	x	*The Regional Economic Strategy for Yorkshire & Humber 2006-2015*	**2006**
Northern Ireland	x	Not in Regional Development Strategy, nor in strategy for voluntary action, nor in strategies for community development	**x**
Scotland	x	*Scottish Enterprise Business Plan 2008-11*	**2008**
Wales	x	*Wales: A Vibrant Economy—The Welsh Assembly Government's Strategic Framework for Economic Development*	**2005**

(Sources: full bibliographical details provided in the reference list)

Wales, and Northern Ireland were thus reviewed. Nine of the regions commit to encouraging CSR among regional businesses (usually in their Regional Economic Strategy). So, somewhat surprisingly from the perspective of the 'triple bottom line', encouragement of CSR is heavily linked to economic strategy first and foremost at the relative expense of the social, cultural and environmental. Only three regions — the West Midlands, the East Midlands and Northern Ireland — had neither a specific CSR policy nor any mention of CSR or relevant concepts in their regional economic strategy or regional development strategy.

National guidance on CSR is not referenced in any of the regional strategies. While several strategies mention partnerships with non-governmental organisations to help encourage CSR in their region, none of the strategies mention the national government's preferred CSR-implementing NGO, Business in the Community.

Of the devolved governments of Scotland, Wales and Northern Ireland, only Scotland includes the promotion of CSR as one of its current contributions to economic development goals. For the Welsh Assembly, the recognition of the 'benefits and importance of corporate social responsibility' among 'businesses and other organisations' is a promising aspiration, but 'much more needs to be done', and it defers to other energy and environment-related publications (Welsh Assembly 2005: 48). No mention of CSR or related concepts could be found for Northern Ireland.

All of the CSR-related strategies in Table 2 were all fairly recent and published within a short period of three years, with the two oldest published in 2005 (Wales and London) — a year after the UK-wide *Corporate Social Responsibility: A Government Update* (DTI 2004) — and the two most recent published in 2008 (Scotland and East Of England). The main themes arising from the regional strategies are that in general terms, CSR can aid the implementation of economic development goals, and CSR is to be encouraged. Although aviation and air transport are mentioned in many of these regional strategies, the responsibilities of the air transport industry are only mentioned in connection with compliance to legislation and no voluntary, CSR-related activities are expressly expected of the aviation industry.

Section 4

Aviation Policy

4.1 Policy toplines

Both the European Commission and the United Kingdom have specific aviation strategies, which have been reviewed and revised several times.

- For both, the main sustainable development issue is the environment, with concern especially for aircraft noise and emissions.
- Only one of the UK regions has an aviation-specific strategy document. For the other regions, aviation policy concerns are included in either the Regional Spatial Strategy or the Regional Transport Strategy.
- At all three levels of aviation strategy, CSR and voluntary responsible business practices are not mentioned, nor are there any goals specific to low-fares airlines.

4.2 EU aviation policy

The Directorate-General for Energy and Transport is responsible for aviation-related policies. Communications on specific pieces of legislation are continuously being published; however, the most comprehensive update on current EU aviation policy is *Flying Together: EU Air Transport Policy* (D-GET 2007a). It provides an overview of the policies that have been put into place to support the more-generalised policy goals for transport infrastructure as a whole proposed in the *White Paper – European Transport Policy for 2010: Time to Decide* (CEC 2001c).

The growth of LFAs is noted in *Flying Together* (D-GET 2007a: 5), which credits them with having 'introduced completely new business models and change the travel habits in many European countries', as well as having 'expanded from 1% seat capacity to 28% in 2006'.

Flying Together also remarks that, in general, competition has increased and prices have decreased. While no low-fares airline-targeted policies are mentioned, the increase in air traffic (partially attributed to LFAs in other sections) has necessitated the Single European Sky ATM Research (SESAR) programme for better air traffic management (ie ATM).

While CSR is not mentioned in either document, sustainable development is a major concern of the *White Paper,* which puts the position that a sustainable transport system should assess an 'economic and social as well as an environmental viewpoint' (CEC 2001c: 10); that is, a fuller perspective of the 'triple bottom line' is required.

In regard to airlines, the *White Paper* proposes that funding should prioritise the development of 'rail, sea and inland waterway transport' and that the current tax exemptions for fuel fail to provide an 'incentive for airlines to use the most efficient aircraft' (CEC 2001c: 12, 39).

In *Flying Together*, a section entitled 'Towards greener air travel' reports measures to limit the levels of noise produced by aircraft, the proposition to include aviation in the EU Emissions Trading Scheme (since passed; see CEC 2008b), and the investment in 'clean technology and improving air traffic flows' (D-GET 2007a: 4).

Flying Together focuses mainly on the environmental concerns of sustainable development. The other two concerns — economic and social — are largely absent, although aviation's contribution to the EU's economy is briefly discussed and the 'social impact of air transport liberalisation' is claimed to be under review. No mention is made of CSR.

4.3 UK aviation policy

The Department for Transport (DfT) leads on UK aviation policy. The most recent UK-wide aviation policy strategy is *The Future of Air Transport: White Paper* (DfT 2003). It was followed up three years later by the *Civil Aviation Act* 2006 (HMG 2006). This addresses some of the specific impediments to the implementation of *The Future of Air Transport*'s vision for sustainable aviation, such as setting penalties for breeches of aircraft noise and emission limits.

The first section of *The Future of Air Transport* (DfT 2003) outlines a strategic framework for balancing future demands with limits on growth; lays out objectives for controlling environmental impacts, such as noise and air quality; and reviews current issues for the air transport sector, such as security, safety, and the role of aviation in tourism and regional development. In the second section, the air transport needs and current resources of each UK region are assessed, and plans for individual airports are outlined.

In regard to LFAs, *The Future of Air Transport* (DfT 2003: 54) notes that the 'recent

emergence of 'no-frills' services […] has stimulated demand' and 'has been a particularly important factor in the growth […] at many regional airports'. This is demonstrated through the prevalent importance of 'no-frills' airlines to a large number of the regional airports analysed in the second section.

The Future of Air Transport credits low-fares airlines with 'bringing air travel within the reach of more people' and opening up 'new routes and destinations' (DfT 2003: 54). For the future, an increase in low-cost air travel is predicted to positively impact the access to 'arts, culture, sports and leisure pursuits', although the negative environmental impacts of increased flying are also noted (DfT 2003: 167).

CSR is not mentioned in either the *Civil Aviation Act 2006* or *The Future of Air Transport*. Responsibility for implementing the objectives of *The Future of Air Transport* is generally allocated to government agencies and regional bodies; however, one notable exception is the call for the aviation sector to take responsibility for its environmental impacts.

On the other hand, great efforts are made to align *The Future of Air Transport* (DfT 2003: 21, 26) with 'the Government's overarching commitment to sustainable development' and its four primary aims of 'social progress which recognises the needs of everyone; effective protection of the environment; prudent use of natural resources; maintenance of high and stable levels of economic growth and employment'. Appendix E of *The Future of Air Transport* analyses the anticipated impacts of the goals on economic, social and environmental sustainable development.

The European Commission's aviation policies are referenced, generally in the context of ensuring that the UK aviation sector complies with them. *The Future of Air Transport* (DfT 2003: 10) also 'sets out proposals to bring aviation within the European Union emissions trading scheme, to help limit greenhouse gas emissions'. While sustainable development (and particularly environmental impacts) is addressed, CSR and voluntary self-regulation by airlines are overlooked.

4.4 UK regional aviation policy and strategy
As Table 3 shows, only one of the regions in the UK (the West Midlands) has an explicit aviation strategy, although it should be noted that regional aviation plans are also comprehensively set out in *The Future of Air Transport* (DfT 2003).

Table 3: 'Aviation policy and strategy' in the UK regions

Region	Aviation Policy	Year Published	Aviation Specific	LFAs Mentioned	Sustainability Mentioned
East of England	*East of England Plan: The Revision to the Regional Spatial Strategy for the East of England*	2008	x	x	✓
East Midlands	*Regional Spatial Strategy for the East Midlands (RSS8)*	2005	x	x	✓
London	*The London Plan: Spatial Development Strategy for Greater London*	2004	x	x	✓
North East	*The North East of England Plan Regional Spatial Strategy to 2021*	2008	x	✓	✓
North West	*North West of England Plan Regional Spatial Strategy to 2021*	2008	x	x	✓
South East	*Regional Transport Strategy*	2004	x	✓	✓
South West	*Regional Spatial Strategy*	summer 2009	x	—	—
West Midlands	*Aerospace Cluster 3 Year Plan 2008-2011*	2007	✓	✓	✓
Yorkshire & Humberside	*The Yorkshire and Humber Plan: Regional Spatial Strategy to 2026*	2008	x	✓	✓
Northern Ireland	*Regional Transport Strategy for Northern Ireland 2002-2012*	2002	x	x	✓
Scotland	*Scotland's National Transport Strategy*	2006	x	x	✓
Wales	*One Wales: Connecting the Nation—the Wales Transport Strategy*	2008	x	x	✓

(Sources: full bibliographical details provided in the reference list)

Instead, aviation is either incorporated in Regional Spatial Strategy (7 regions) or Regional Transport Strategy (4 regions). Most of the strategies have recently been updated. Seven of the twelve documents were published within the last two years. The most dated strategy is Northern Ireland's, which was the only one to be published before *The Future of Air Transport.* Of the eleven regional strategies published after *The Future of Air Transport,* only two (the West Midlands' and Wales') do not mention its role in the development and regulation of aviation or its predictions for future development.

For the devolved governments of Scotland and Wales, air transport is mainly mentioned in the context of emissions, specifically the need to regulate and reduce current emissions. As the oldest document, Northern Ireland's 2002 strategy focuses primarily on the role of airports and air connectivity in regional development.

In general, three main issues overlap these regional policies: emissions and environmental impacts of air transport; the control/support of airport expansion; and regional socio-economic dependence on air transport. In contrast, LFAs are rarely mentioned. When referenced, LFAs are used to illustrate the need for airport modernisation and expansion, as the increase in low-fares flights is claimed to have been a major pressure on existing infrastructure. However, these statements about LFAs and their impacts are general, and a specific quantitative analysis of their impacts is not included. There are no LFA-specific policy statements or strategies.

Sustainability and sustainable development are mentioned in all of the documents. Policies are positioned so that aims and strategies are located in the context of a wider, sustainable development agenda for the region that aligns with UK national sustainable development policies. CSR and business responsibility are not mentioned in any of the documents. Regulation, then, by implication seems to be the only considered course of action for mitigating aviation's impacts.

Conclusions

5.1 Main findings

Policy in the three areas of sustainable development, CSR and aviation has for the most part been siloed, with only a very limited level of linkage between them. This is despite the convenient and obvious connections that are made in public discourse and debate within the popular media. Within the UK, different Departments of State are responsible for leading on policy on sustainable development, CSR and aviation, and the evidence presented here would suggest that there is little in the way of co-ordination or dialogue between them on such matters. Thus, in the case of these three policy domains, 'joined-up' policy or governance is difficult to identify; however, although the policy landscape is complex, it may hardly be described as a 'policy mess'.

The limitations of current policy are evident in so far as:

- Although the need for business participation in sustainable development has been recognised (especially at the EU level), CSR and sustainable development have not been extensively linked beyond a somewhat superficial conceptual level in policy statements and strategies.
- CSR policy at the EU and UK level has not been developed significantly in recent years, no hard targets have been set for encouraging its implementation, and CSR is largely absent as a policy consideration or aspiration at the regional level.
- Aviation is recognised in EU and UK sustainable development policy — albeit on a limited basis — but the emphasis is on environmental impacts and the Emissions Trading Scheme at the expense of a much fuller treatment of the 'triple bottom line'.
- Aviation policy recognises the importance of sustainable development but CSR is not identified or encouraged as a means by which to deliver this. This is especially significant because aviation policy has been reviewed and revised since the publication of the EU's strategy on CSR.

5.2 Implications of the review

This review raises four sets of issues of relevance to policy-makers and practitioners for the future development and implementation of CSR among LFAs:

1. CSR strategies among LFAs flying to and from the UK must, out of necessity, be informed by a complex array of policy statements pertaining to CSR and sustainable development.

2. Future policy towards more sustainable aviation must fully acknowledge and integrate the 'triple bottom line' while encouraging greater CSR in the sector.

3. CSR offers an alternative means to facilitate more sustainable futures in the sector, but it has to be appropriately encouraged by complementary EU and UK policy.

4. Opportunities exist for businesses and trade associations to seize initiative and to encourage the greater adoption of CSR in the LFA sector, thereby obviating the need for formal regulation. Although several industry bodies address issues of sustainable development, there has been little leadership or progress in the advocacy of CSR as an allied concept.

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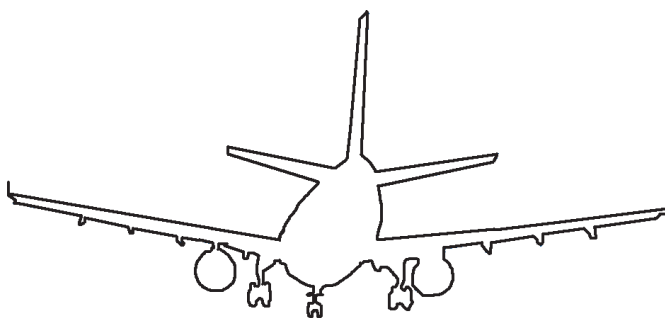
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