

The Sixth Carbon Budget and Welsh emissions targets – Call for Evidence

Background to the UK's sixth carbon budget

The UK Government and Parliament have adopted the Committee on Climate Change's (CCC) [recommendation](#) to target net-zero emissions of greenhouse gases (GHGs) in the UK by 2050 (i.e. at least a 100% reduction in emissions from 1990).

[The Climate Change Act](#) (2008, 'the Act') requires the Committee to provide advice to the Government about the appropriate level for each carbon budget (sequential five-year caps on GHGs) on the path to the long-term target. To date, in line with advice from the Committee, five carbon budgets have been legislated covering the period out to 2032.

The Committee must provide advice on the level of the sixth carbon budget (covering the period from 2033-37) before the end of 2020. The Committee intends to publish its advice early, in September 2020. This advice will set the path to net-zero GHG emissions for the UK, as the first time a carbon budget is set in law following that commitment.

Both the 2050 target and the carbon budgets guide the setting of policies to cut emissions across the economy (for example, as set out most recently in the 2017 [Clean Growth Strategy](#)).

The Act also specifies other factors the Committee must consider in our advice on carbon budgets – the advice should be based on the path to the UK's long-term target objective, consistent with international commitments and take into account considerations such as social circumstances (including fuel poverty), competitiveness, energy security and the Government's fiscal position.

The CCC will advise based on these considerations and a thorough assessment of the relevant evidence. This Call for Evidence will contribute to that advice.

Background to the Welsh third carbon budget and interim targets

Under the Environment (Wales) Act 2016, there is a duty on Welsh Ministers to set a maximum total amount for net Welsh greenhouse gas emissions (Welsh carbon budgets). The first budgetary period is 2016-20, and the remaining budgetary periods are each succeeding period of five years, ending with 2046-50.

The Committee is due to provide advice to the Welsh Government on the level of the third Welsh carbon budget (covering 2026-30) in 2020, and to provide updated advice on the levels of the second carbon budget (2021-25) and the interim targets for 2030 and 2040. Section D of this Call for Evidence (covering questions on Scotland, Wales and Northern Ireland) includes a set of questions to inform the Committee's advice to the Welsh Government.

Question and answer form

When responding, please provide answers that are as specific and evidence-based as possible, providing data and references to the extent possible.

Please limit your answers to 400 words per question and provide supporting evidence (e.g. academic literature, market assessments, policy reports, etc.) along with your responses.

A. Climate science and international circumstances

Question 1: The climate science considered in the CCC's 2019 Net Zero report, based on the IPCC Special Report on Global Warming of 1.5°C, will form the basis of this advice. What additional evidence on climate science, aside from the most recent IPCC Special Reports on Land and the Oceans and Cryosphere, should the CCC consider in setting the level of the sixth carbon budget?

ANSWER: n/a

Question 2: How relevant are estimates of the remaining global cumulative CO₂ budgets (consistent with the Paris Agreement long-term temperature goal) for constraining UK cumulative emissions on the pathway to reaching net-zero GHGs by 2050?

ANSWER: n/a

Question 3: How should emerging updated international commitments to reduce emissions by 2030 impact on the level of the sixth carbon budget for the UK? Are there other actions the UK should be taking alongside setting the sixth carbon budget, and taking the actions necessary to meet it, to support the global effort to implement the Paris Agreement?

ANSWER: n/a

Question 4: What is the international signalling value of a revised and strengthened UK NDC (for the period around 2030) as part of a package of action which includes setting the level of the sixth carbon budget?

ANSWER: n/a

B. The path to the 2050 target

Question 5: How big a role can consumer, individual or household behaviour play in delivering emissions reductions? How can this be credibly assessed and incentivised?

ANSWER:

National Express agrees that carbon budgets need to be set on a path that is achievable from today.

Transport is now the UK's largest source of greenhouse gases, accounting for 27% of domestic emissions - <https://www.gov.uk/government/collections/final-uk-greenhouse-gas-emissions-national-statistics>

And according to Birmingham City Council's Birmingham Transport Plan, 25% of all car journeys undertaken by the city's residents are less than a mile.

So in metropolitan areas, changing individual and/or household behaviour - replacing some of those car journeys with public transport or active travel - can play a huge role in delivering emissions reductions.

Modal shift has the added benefit of reducing emissions at very little cost. Increasing bus priority to tackle congestion in urban areas represents great value, with lead times of months, rather than years. It usually only means new signs and lines, kerb alterations, legal changes to the highways and sometimes technical solutions such as ANPR cameras or bus gates.

Question 6: What are the most important uncertainties that policy needs to take into account in thinking about achieving Net Zero? How can government develop a strategy that helps to retain robustness to those uncertainties, for example low-regrets options and approaches that maintain optionality?

ANSWER:

Please see our answer to Question 5.

Question 7: The fourth and fifth carbon budgets (covering the periods of 2023-27 and 2028-32 respectively) have been set on the basis of the previous long-term target (at least 80% reduction in GHGs by 2050, relative to 1990 levels). Should the CCC revisit the level of these budgets in light of the net-zero target?

ANSWER: n/a

Question 8: What evidence do you have of the co-benefits of acting on climate change compatible with achieving Net Zero by 2050? What do these co-benefits mean for which emissions abatement should be prioritised and why?

ANSWER: n/a

C. Delivering carbon budgets

Question 9: Carbon targets are only credible if they are accompanied by policy action. We set out a range of delivery challenges/priorities for the 2050 net-zero target in our Net Zero advice. What else is important for the period out to 2030/2035?

ANSWER: n/a

Question 10: How should the Committee take into account targets/ambitions of UK local areas, cities, etc. in its advice on the sixth carbon budget?

ANSWER: n/a

Question 11: Can impacts on competitiveness, the fiscal balance, fuel poverty and security of supply be managed regardless of the level of a budget, depending on how policy is designed and funded? What are the critical elements of policy design (including funding and delivery) which can help to manage these impacts?

ANSWER:

Mass transit is by its very nature better for cutting carbon emissions than use of private cars. Even on National Express' existing all-diesel (including hybrids) fleet, a 5-mile journey in an urban area on a bus emits half as much carbon as going by car.

New technologies such as ultra-low emission buses inevitably incur extra costs. Electric buses (which are zero carbon) are currently twice as expensive to buy as (low-carbon certified) diesel buses. So as not to have to increase bus fares to an unsustainable - given the passenger demographic - level, most bus operators rely on government funding rounds to help them invest in low-carbon buses. These schemes usually cover about 75% of the difference between the cost of a diesel bus and an electric bus.

While the incremental capital costs are widely recognised and sporadically funded, ongoing revenue costs are also higher, at least in the short to medium term. This is partly due to scale and partly due to the fact that new processes and approaches require development.

It would therefore be very helpful if government funding could be provided to cover these extra revenue costs, possibly just for the first 3-5 years of a new technology.

These measures would benefit all bus operators and not affect the competitiveness of existing UK bus markets - either manufacturing or operating.

However, if expensive brand-new electric buses are stuck in congestion, customers will not find them attractive and modal shift will not happen fast enough to tackle this climate emergency.

Any investment in highways infrastructure that tackles congestion will make it easier for bus operators to keep fares low, or even discount them for target customer demographics eg young people or passengers from areas of high deprivation.

For long-distance coach, there is currently no viable electric vehicle available with the required range. The lack of charging infrastructure is also problematic. Government support for coach similar to the Clean Bus Technology Fund could facilitate the development and trialling of low-emission technologies for coaches and encourage early adoption in the sector.

Question 12: How can a just transition to Net Zero be delivered that fairly shares the costs and benefits between different income groups, industries and parts of the UK, and protects vulnerable workers and consumers?

ANSWER:

Modal shift represents a just transition. Currently, buses filled with 100 people who either can't afford to or choose not to travel by car are stuck in congestion because of hundreds of people who can afford to or choose to drive alone in their car.

In Birmingham over the last 10 years, bus journey times have fallen by 10%, massively shrinking the areas of the city accessible by a 45-minute public transport commute. Improving bus services not only protects vulnerable workers and consumers - it gives them better access to opportunity. Cutting congestion and introducing other measures to encourage modal shift - such as changes to city-centre car parking availability and price - makes wealth-creating city centres more accessible to a wider range of people.

D. Scotland, Wales and Northern Ireland

Question 13: What specific circumstances need to be considered when recommending an emissions pathway or emissions reduction targets for Scotland, Wales and/or Northern Ireland, and how could these be reflected in our advice on the UK-wide sixth carbon budget?

ANSWER: n/a

Question 14: The Environment (Wales) Act 2016 includes a requirement that its targets and carbon budgets are set with regard to:

- The most recent report under section 8 on the State of Natural Resources in relation to Wales;
 - The most recent Future Trends report under section 11 of the Well-Being of Future Generations (Wales) Act 2015;
 - The most recent report (if any) under section 23 of that Act (Future Generations report).
- a) What evidence should the Committee draw on in assessing impacts on sustainable management of natural resources, as assessed in the state of natural resources report?
 - b) What evidence do you have of the impact of acting on climate change on well-being? What are the opportunities to improve people's well-being, or potential risks, associated with activities to reduce emissions in Wales?
 - c) What evidence regarding future trends as identified and analysed in the future trends report should the Committee draw on in assessing the impacts of the targets?
 - d) Question 12 asks how a just transition to Net Zero can be achieved across the UK. Do you have any evidence on how delivery mechanisms to help meet the UK and Welsh targets may affect workers and consumers in

Wales, and how to ensure the costs and benefits of this transition are fairly distributed?

ANSWER: n/a

Question 15: Do you have any further evidence on the appropriate level of Wales' third carbon budget (2026-30) and interim targets for 2030 and 2040, on the path to a reduction of at least 95% by 2050?

ANSWER: n/a

Question 16: Do you have any evidence on the appropriate level of Scotland's interim emissions reduction targets in 2030 and 2040?

ANSWER: n/a

Question 17: In what particular respects do devolved and UK decision making need to be coordinated? How can devolved and UK decision making be coordinated effectively to achieve the best outcomes for the UK as a whole?

ANSWER: n/a

E. Sector-specific questions

Question 18 (Surface transport): As laid out in Chapter 5 of the Net Zero Technical Report (see page 149), the CCC's Further Ambition scenario for transport assumed 10% of car miles could be shifted to walking, cycling and public transport by 2050 (corresponding to over 30% of trips in total):

- a) What percentage of trips nationwide could be avoided (e.g. through car sharing, working from home etc.) or shifted to walking, cycling (including e-bikes) and public transport by 2030/35 and by 2050? What proportion of total UK car mileage does this correspond to?
- b) What policies, measures or investment could incentivise this transition?

ANSWER:

a) According to Birmingham City Council's Birmingham Transport Plan, 25% of all car journeys undertaken by the city's residents are less than a mile.

Every 1% increase in bus journey time results in a 1% drop in passengers. However, at National Express West Midlands, we have proved that when we work in partnership with local authorities and Transport for West Midlands - they provide highways improvements to speed up bus journey times and we invest in top-spec buses with free wifi and extra legroom - we can increase the amount of passengers on our services by 16%.

b) Anything that speeds up bus journey times and makes them more reliable will lead to modal shift:

- Bus priority
- Subsidy for public transport fares
- Parking changes (availability and price) as well as enforcement
- Co-ordination and management of highways disruption - planned and unplanned

For longer-distance journeys:

- Coach is a significant and growing mode of transport - National Express had a record year last year
- Of c910 million leisure trips of 50+ miles each year, coach has a 2.5% share (22.7m journeys). We want to grow this. Targeting modal shift on journeys of 15 miles or more and those that are cross-boundary is worthwhile as coach offers a viable alternative to private car
- Coach plays a critical role in the delivery of a resilient and comprehensive national transport network and we often step in when other modes (i.e. rail) are struggling
- Coach offers value for money for the public purse; it doesn't require large-scale public subsidy or major infrastructure investment to deliver
- Coach can quickly adapt to connectivity gaps and passenger demand, as well as helping increase public transport mode share, tackle congestion and unlock capacity on the strategic and metropolitan main road network
- Coach can deliver more, but needs to take a more significant role in transport infrastructure planning and delivery alongside other modes, including rail
- Local transport plans should make specific reference to the role of coach, particularly ensuring coach services are taken into account alongside other modes as part of the development of interchanges which support multi-modal journeys. Demonstrating that this has been adequately considered (where applicable) could be made a requirement in applying for funding from central government for any schemes/infrastructure that could be used by coach.

Question 19 (Surface transport): What could the potential impact of autonomous vehicles be on transport demand?

ANSWER: n/a

Question 20 (Surface transport): The CCC recommended in our Net Zero advice that the phase out of conventional car sales should occur by 2035 at the latest. What are the barriers to phasing out sales of conventional vehicles by 2030? How could these be addressed? Are the supply chains well placed to scale up? What might be the adverse consequences of a phase-out of conventional vehicles by 2030 and how could these be mitigated?

ANSWER: n/a

Question 21 (Surface transport): In our Net Zero advice, the CCC identified three potential options to switch to zero emission HGVs – hydrogen, electrification with very fast chargers and electrification with overhead wires on motorways. What evidence and steps would be required to enable an operator to switch their fleets to one of these options? How could this transition be facilitated?

ANSWER:

The key issue of range also affects long-distance and inter-city coaches which are often operating remotely from their home depot and may not even return to their depot overnight. This is the case for a number of National Express coaches.

Practicality, effectiveness and minimum impact on overall journey times are the key parameters necessary to enable a significant conversion from diesel to electric traction. Long delays while the vehicle is charging during the journey will be costly and highly unattractive to passengers. Equally a vehicle will need to guarantee that the charging facility is available and in operational use at the required location.

Hydrogen appears to offer one solution but needs to be proved in relation to fast, long-distance services. In addition, the cost of producing hydrogen is currently high. To be carbon neutral, the hydrogen needs to have been produced from 'green' electricity eg solar or wind, or be a by-product of another chemical process.

In relation to electric power it appears that in-the-road/on-the-move induction charging may be a practical and attractive way forward. Overhead electrification is complex to maintain and, as demonstrated on the railway system, prone to failure, particularly in poor weather conditions.

Question 22 (Industry): What policy mechanisms should be implemented to support decarbonisation of the sectors below? Please provide evidence to support this over alternative mechanisms.

- a) Manufacturing sectors at risk of carbon leakage
- b) Manufacturing sectors not at risk of carbon leakage
- c) Fossil fuel production sectors
- d) Off-road mobile machinery

ANSWER: n/a

Question 23 (Industry): What would you highlight as international examples of good policy/practice on decarbonisation of manufacturing and fossil fuel supply emissions? Is there evidence to suggest that these policies or practices created economic opportunities (e.g. increased market shares, job creation) for the manufacturing and fossil fuel supply sectors?

ANSWER: n/a

Question 24 (Industry): How can the UK achieve a just transition in the fossil fuel supply sectors?

ANSWER: n/a

Question 25 (Industry): In our Net Zero advice, the CCC identified a range of resource efficiency measures that can reduce emissions (see Chapter 4 of the Net Zero Technical Report, page 115), but found little evidence relating to the costs/savings of these measures. What evidence is there on the costs/savings of these and other resource efficiency measures (ideally on a £/tCO₂e basis)?

ANSWER: n/a

Question 26 (Buildings): For the majority of the housing stock in the CCC's Net Zero Further Ambition scenario, 2050 is assumed to be a realistic timeframe for full roll-out of energy efficiency and low-carbon heating.

- a) What evidence can you point to about the potential for decarbonising heat in buildings more quickly?
- b) What evidence do you have about the role behaviour change could play in driving forward more extensive decarbonisation of the building stock more quickly? What are the costs/levels of abatement that might be associated with a behaviour-led transition?

ANSWER: n/a

Question 27 (Buildings): Do we currently have the right skills in place to enable widespread retrofit and build of low-carbon buildings? If not, where are skills lacking and what are the gaps in the current training framework? To what extent are existing skill sets readily transferable to low-carbon skills requirements?

ANSWER: n/a

Question 28 (Buildings): How can local/regional and national decision making be coordinated effectively to achieve the best outcomes for the UK as a whole? Can you point to any case studies which illustrate successful local or regional governance models for decision making in heat decarbonisation?

ANSWER: n/a

Question 29 (Power): Think of a possible future power system without Government backed Contracts-for-Difference. What business models and/or policy instruments could be used to continue to decarbonise UK power emissions to close to zero by 2050, whilst minimising costs?

ANSWER: n/a

Question 30 (Power): In Chapter 2 of the Net Zero Technical Report we presented an illustrative power scenario for 2050 (see pages 40-41 in particular):

- a) Which low-carbon technologies could play a greater/lesser role in the 2050 generation mix? What about in a generation mix in 2030/35?

- b) Power from weather-dependent renewables is highly variable on both daily and seasonal scales. Modelling by Imperial College which informed the illustrative 2050 scenario suggested an important role for interconnection, battery storage and flexible demand in a future low-carbon power system:
- i. What other technologies could play a role here?
 - ii. What evidence do you have for how much demand side flexibility might be realised?

ANSWER: n/a

Question 31 (Hydrogen): The Committee has recommended the Government support the delivery of at least one large-scale low-carbon hydrogen production facility in the 2020s. Beyond this initial facility, what mechanisms can be used to efficiently incentivise the production and use of low-carbon hydrogen? What are the most likely early applications for hydrogen?

ANSWER:

Birmingham City Council has just run a tender process for the 7-year operation of 20 hydrogen buses, as part of the EU's JIVE (Joint Initiative for hydrogen Vehicles across Europe) project to commercialise fuel cell buses. Birmingham's £13.4m project is funded by OLEV, the Greater Birmingham and Solihull Local Enterprise Partnership, the EU and the city council.

Question 32 (Aviation and Shipping): In September 2019 the Committee published advice to Government on international aviation and shipping and Net Zero. The Committee recognises that the primary policy approach for reducing emissions in these sectors should be set at the international level (e.g. through the International Civil Aviation Organisation and International Maritime Organisation). However, there is still a role for supplementary domestic policies to complement the international approach, provided these do not lead to concerns about competitiveness or carbon leakage. What are the domestic measures the UK could take to reduce aviation and shipping emissions over the period to 2030/35 and longer-term to 2050, which would not create significant competitiveness or carbon leakage risks? How much could these reduce emissions?

ANSWER: n/a

Question 33 (Agriculture and Land use): In Chapter 7 of the Net Zero Technical Report we presented our Further Ambition scenario for agriculture and land use (see page 199). The scenario requires measures to release land currently used for food production for other uses, whilst maintaining current per-capita food production. This is achieved through:

- A 20% reduction in consumption of red meat and dairy
- A 20% reduction in food waste by 2025
- Moving 10% of horticulture indoors
- An increase in agriculture productivity:

- Crop yields rising from the current average of 8 tonnes/hectare for wheat (and equivalent rates for other crops) to 10 tonnes/hectare
- Livestock stocking density increasing from just over 1 livestock unit (LU)/hectare to 1.5 LU/hectare

Can this increase in productivity be delivered in a sustainable manner?

Do you agree that these are the right measures and with the broad level of ambition indicated? Are there additional measures you would suggest?

ANSWER: n/a

Question 34 (Agriculture and Land use): Land spared through the measures set out in question 33 is used in our Further Ambition scenario for: afforestation (30,000 hectares/year), bioenergy crops (23,000 hectares/year), agro-forestry and hedgerows (~10% of agricultural land) and peatland restoration (50% of upland peat, 25% lowland peat). We also assume the take-up of low-carbon farming practices for soils and livestock. Do you agree that these are the key measures and with the broad level of ambition of each? Are there additional measures you would suggest?

ANSWER: n/a

Question 35 (Greenhouse gas removals): What relevant evidence exists regarding constraints on the rate at which the deployment of engineered GHG removals in the UK (such as bioenergy with carbon capture and storage or direct air capture) could scale-up by 2035?

ANSWER: n/a

Question 36 (Greenhouse gas removals): Is there evidence regarding near-term expected learning curves for the cost of engineered GHG removal through technologies such as bioenergy with carbon capture and storage or direct air capture of CO₂?

ANSWER: n/a

Question 37 (Infrastructure): What will be the key factors that will determine whether decarbonisation of heat in a particular area will require investment in the electricity distribution network, the gas distribution network or a heat network?

ANSWER: n/a

Question 38 (Infrastructure): What scale of carbon capture and storage development is needed and what does that mean for development of CO₂ transport and storage infrastructure over the period to 2030?

ANSWER: n/a