

## 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 CO<sub>2</sub> 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: If the global effort and international commitments to reduce emissions are reduced, then the UK must press ahead and maintain its aims of achieving at least net zero carbon.

**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: Everyone has a role to play and so behaviour change at national, local and individual level is critical. Tina Fawcett produced personal carbon allowances many years

ago - why have these been rejected given that we accept lots of other allowances i.e. phone minutes, Oyster card etc.

Is this not the equitable way to manage personal carbon and decision making?  
<https://www.eci.ox.ac.uk/research/energy/archive-carbon-trading.html>

**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: Precautionary principle and low-regrets options are the most appropriate course given that uncertainties are just that.

**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: One of the problems with the carbon budgets is the carbon that is assessed. Given that the UK has moved so significantly from a manufacturing to a service economy, are we not kidding ourselves if we don't take account of imported carbon in the goods we use for example? i.e. consumption based emissions  
<https://ourworldindata.org/consumption-based-co2>

Without this any 'success' we proclaim needs to have a clear caveat.

**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: If you look at a timeline of how long we have known about 'climate change' - but let's not start with Tyndall in 1859, but settle on James Hansen in 1988 - we are talking about 30 years + of failing to act as significantly as we should and so now the effort required is exponentially greater. Policies, starting with the Climate Change Act requiring net zero carbon by 2050 need to be reflected in all levels of policy making at city and local authority level.

For example, on 'trees' which seem to be increasingly in the spotlight - we desperately need a national tree strategy (for each of the UK's 'governments') which also requires that

all local authorities have tree strategies and management plans - this way 30,000 HA of trees per annum for 30 years might be deliverable

**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:** This would be reasonable and could reflect the maximum actions that local areas, cities etc can take. For examples rural and especially upland farming could include more tree planting and natural regeneration areas than urban and peri-urban areas etc.

**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:** n/a

**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:** The climate change imperative is such that we cannot afford to be a low tax economy for those who can afford to contribute more.

## 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:** As far as trees are concerned both Scotland and Wales offer tremendous opportunities for both tree planting and natural regeneration. They also offer scope for productive forests and woodlands whereby felled trees can be embodied in buildings.

**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:

b) Improving air quality and health; increasing access to green space and health; increasing trees in streets to encourage active travel and health.

There is evidence for all these benefits. However, monitoring results of undertaking any of the above over time should be part of undertaking the improvements.

**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: Environment is a devolved power but it is vital that there is coordination and clarity and congruence of aims between the UK government and the devolved administrations on all matters of environment, emissions reduction and biodiversity and environmental net gain - a common framework is vital.

<https://publications.parliament.uk/pa/cm201719/cmselect/cmenvaud/1951/195109.htm>

## 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:** More than half the journeys taken by car are under 5 miles. Cars are used for 77% of the overall distances travelled in the UK. 20% of these journeys are under 1 mile, 38% under 2 miles and 60% under 5 miles.

We have already touched on the health benefits of active travel (walking and cycling) but these need investment in dedicated cycle routes, footpaths in rural areas, road space taken from cars and other vehicles for pedestrians and tree planting (to make their use more attractive especially in summer) and public transport needs to be efficient and available and probably subsidised or free in both urban and rural areas. Car taxes should be correspondingly higher/

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

**ANSWER:** Why are we pursuing autonomous vehicles?

Christian Wolmar's 'Driverless cars: on a road to nowhere' is convincing on this.

**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:** Replacing conventional cars with electric cars is not an option if they simply allow people to retain private cars...we have fixed spaces in our towns and cities and this space is needed for walking, cycling, playing etc...

So the real issue is that we need to stop encouraging 'cars' as a mainstay of the economy

**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:** n/a

**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 £/tCO<sub>2</sub>e 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: We are in a difficult place and need to act effectively. We don't seem to inspire retrofitting of the existing housing stock for the many benefits this can bring to the quality of the living space.

There was at one time a scheme put forward in Denmark or Germany that any house sold that was not up to energy efficiency standards could not be reoccupied until it had been retrofitted - so an incentive for owners to retrofit or have a price adjustment so that buyers can do so before occupying. Empty houses are easier to deep retrofit than occupied ones where the extent of retrofitting may be more limited.

**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: Could hydrogen be considered realistic for housing? Probably not.

**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: 'Flightshame' is one...people need to stop flying as the cheap option...which means that alternatives need to be competitive even if subsidised.

The idea of off-setting flights should be rejected as an excuse for flying. Again, given the extent of leisure rather than business flying, personal carbon allowances would sharpen decision making here.

**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: Meat especially should be treated differently as an expensive part of the diet - no more £2 chickens from Lidl or Aldi!

**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: Yes - agree with the above. In addition...it is not just a case of tree planting but also of setting land aside for natural regeneration. According to the Grantham Institute a tree will sequester 1 tonne over carbon over a 100 year life...so all trees planted must survive...to meet the CCC's expectations!

<https://granthaminstitute.com/2015/09/02/how-much-co2-can-trees-take-up/>

Nick Atkinson:how to make space for 2 billion trees

<https://theconversation.com/climate-crisis-how-to-make-space-for-2-billion-trees-on-a-crowded-island-like-the-uk-128098>

Some points to consider

1. Significant changes in land use...how are some of the 'conservation groups' such as the Lake District etc going to respond to having trees not Herdwick sheep on those stripped Lakeland Hills, ditto the Brecon Beacons, the changes to hill farming (social implications etc....???)
2. Where are the trees going to come from if there is not a substantial amount of land left to natural regeneration?
3. What species of trees should we plant if we are to have resilient future forests and woodlands?
4. What is the role of productive forestry and managed woodlands i.e. linked to timber in construction etc so that the carbon remains embodied? (How does this fit with the Grenfell report and fear of combustible materials...which timber isn't in the way feared!)

Some things that are being done:

1. AECOM has a living natural capital lab study in Scotland...

<https://www.aecom.com/uk/press-releases/aecom-launches-pioneering-natural-capital-laboratory-in-the-scottish-highlands/>

2. There is the Trees for Life project Rewilding the Scottish Highlands and restoring the forests... [https://treesforlife.org.uk/?gclid=CjwKCAiAg9rxBRADEiwAxKDTuqob-0a16k6f3x\\_Ay8x7QqNtC\\_dU9-L3\\_Z9E6lyfWmmP0m1BdxINqRoCF-8QAyD\\_BwE](https://treesforlife.org.uk/?gclid=CjwKCAiAg9rxBRADEiwAxKDTuqob-0a16k6f3x_Ay8x7QqNtC_dU9-L3_Z9E6lyfWmmP0m1BdxINqRoCF-8QAyD_BwE)

3. Scottish Natural Heritage (<https://www.nature.scot/professional-advice/land-and-sea-management/managing-land/forests-and-woodlands/woodland-and-climate-change>)

4. Forestry Commission Scotland first produced a climate change programme in, I think, 2006 - <https://forestry.gov.scot/publications/88-climate-change-programme/viewdocument>

5. Professor Rob MacKenzie's BiFOR project

(<https://www.birmingham.ac.uk/research/bifor/index.aspx>) is looking at the impact of climate and environmental change on woodlands...so important given the expectation of what trees may achieve for the carbon budget.

Increased tree cover and going from 13-17% is still below the European average of 35%

**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 CO<sub>2</sub>?

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 CO<sub>2</sub> transport and storage infrastructure over the period to 2030?

ANSWER: n/a