**What should be the Government’s priorities in deciding which EU-led climate policies and legislation to retain?**

The government should seek to meet and exceed the requirements of EU-led climate policies and legislation as a general rule, with the exception of where the balance of evidence indicates in specific cases that the policies and legislation would on balance hinder rather than help the UK’s efforts to tackle climate change. There are strong ethical, political, economic and social reasons why the government should take such an approach.

The ethical reasons should not need to be stated, indeed Lord Stern has written extensively on this. The evidence of the extent and direction of anthropocentric climate change are already becoming manifest. Even if the UK were to take an insular view rather than consider the impacts in other parts of the world, the government has a duty of care to the British people, who stand to become exponentially more exposed – both directly and indirectly – to the consequences of climate change as this century progresses.

The UK led the industrial revolution that helped improve the lives of much of the world’s population, but at a significant environmental cost. (It’s telling that international climate change targets are measured against pre-industrial levels.) The UK therefore has a responsibility to lead the world in the next industrial revolution: fighting both climate change and the unsustainable consumption of finite resources. Thankfully, this happens to represent a significant opportunity to create jobs, become more competitive, and improve the health and well-being of the British people.

Political argument

Politically, there is a strong case for the UK seeking to meet and exceed the minimum requirements of EU policy with regard to climate change, given that this may be required, depending on how the negotiations on Brexit go. It's impossible to say what concessions the UK will win. In fact exceeding minimum requirements in this and other areas may strengthen the UK government's hand in negotiating for concessions in areas of most concern to government. The UK’s negotiating position will surely be stronger if the UK is making extra effort and acting as a leader in certain areas of international significance, such as climate change mitigation and adaptation.

There is also an argument that meeting EU policy in this and other areas may help to prevent the break-up of the United Kingdom. Both Scotland and Northern Ireland voted to remain. Both are entitled to use their devolved powers to set policies in areas such as building regulations. Should Scotland or Northern Ireland decide ultimately to leave the UK and to reapply for membership of the EU, their chances will be greater if they have implemented the requirements of EU directives, such as on the energy performance of buildings. Should they use their devolved powers to do so, and should England and Wales take less ambitious approaches, it risks creating a situation where Scotland and Northern Ireland are more aligned with the EU than the rest of the UK.

**Economic argument**

It is a fallacy that tackling climate change need be expensive. As McKinsey’s Global Greenhouse Gas Cost Abatement curve demonstrates,[[1]](#footnote-1) 35% of the long list of abatement methods considered are net profit positive. The government may wish to prioritise these net profit positive measures when planning which climate change mitigation polices to adapt most aggressively, while also considering additional economic and other benefits that specific measures may bring. For instance, take buildings. Where Britain’s trading partners in the EU and EEA are required to ensure that buildings meet energy performance targets such as the imminent nearly zero energy building (nZEB) deadlines, new solutions will be required – new technologies, new approaches to design and even new construction processes. If the British construction sector – from professionals, to trades, to manufacturers – is working to standards such as Nzeb, it stands a chance of benefiting from lucrative local export markets.

Many construction products don't tend to travel far, due to bulk, weight etc, meaning that the available import/export markets will tend to be local. Therefore trade within the EU – and specifically with neighbouring countries, predominantly Northern European countries who tend to make a better fist of implementing EU policy, and have similar climate conditions to the UK relative to southern Europe and beyond – is of paramount importance. But without sufficient ambition the UK won't be able to sell into these predominantly affluent markets at a time when the need to meet nZEB deadlines for new buildings and renovations will create significant demand for suitable construction products.

The government should also take particular care to ensure that the Northern Irish economy, which is heavily reliant on cross-border trade with the Republic of Ireland, is protected by ensuring that Northern Irish businesses are set up to help consumers and business in the republic to meet their obligations under EU-led climate change policies and legislation, such as the nZEB requirements for buildings.

In terms of exceeding the requirements of EU directives on climate change, the UK should look to the most authoritative source globally with regard to climate change mitigation and adaptation policies, namely the Intergovernmental Panel on Climate Change.

To ensure buildings play their role with regard to climate change mitigation, the UK should seek the advice of the co-ordinating lead authors of the buildings chapter of the IPCC's 5th assessment report.[[2]](#footnote-2)

**Social**

Failure to tackle climate change up to and in excess of requirements of EU policy could have significant adverse social impacts. Displacement of people fleeing regions which have become untenable due to climate change or conflicts caused at least in part by climate change may lead to more pressure on the UK in terms of net migration, both within and without of the Commonwealth.

The social risks are significant and varied, taking into account, inter alia, flooding, excess summer mortality increases, spread of viruses, pressure on food supply, etc.

**The European Union has established common frameworks for reducing energy consumption and increasing renewable energy use. This includes increasing the share of EU energy produced from renewable resources by 20%: Renewable Energy Sources Directive, 2009 (Directive 2009/28/EC). The section that deals with Renewable Heat is problematic. This Directive and the way that the UK chooses to implement it leads to an inappropriate and dangerous use of biomass for space heating and electricity generation.**

The UK government has published sustainability criteria for biomass fuel for energy generation, to remain in place until 2027 – even though the government itself accepts that their criteria do not fully address the carbon emissions from burning biomass (see <https://www.gov.uk/government/consultations/ensuring-biomass-affordability-and-value-for-money-under-the-renewables-obligation> )

The fact that burning biomass releases carbon dioxide which may not be reabsorbed soon enough – thus potentially leading to a rise, rather than a fall, in CO2 emissions – was highlighted by the AECB in 2010 (<http://www.aecb.net/publications/biomass-a-burning-issue/> ) and addressed again at the start of this year (<http://www.aecb.net/biomass-heat-facing-the-carbon-reality-2> /)

The Department of Energy and Climate Change (DECC) had relatively recently accepted this point in principle – but Government is still failing to address the issue in policies for subsidising bioenergy.  As DECC admitted, “the proposed renewables obligation sustainability criteria do not currently directly address the preservation of … carbon stocks except where the reported use of the land changes.” (Reduced carbon stock in a forest after harvesting for bioenergy equates to increased CO2 in the atmosphere.)

Nick Grant and Alan Clarke pointed out in their discussion paper that the burning of wood for fuel was not the only possible fate of carbon taken up during tree growth – and other uses for the wood (e.g. construction, storage in the soil) could lead to an overall reduction of atmospheric CO2.  By contrast, they argued, burning wood produces high CO2 emissions, but these are completely overlooked in current accounting practice.

Environmental bodies including the RSPB, Friends of the Earth, and Biofuelwatch have previously criticised DECC’s new biomass sustainability criteria for failing to address this issue and account properly for changes in carbon stocks (and also for failing to give adequate protection for wildlife, biodiversity and human rights).  **However** **DECC does appear to have accepted the importance of the carbon stock change issue (often described as “carbon debt”) – even while failing to take the issue into account in its policies.**

The Department developed a bioenergy calculator (the BEaC -Biomass Emissions and Counterfactual – Model) that does look at carbon debt. As reported on the Business Green website, “[the BEaC calculator]’s preliminary findings suggested the carbon impact of biomass rises significantly when carbon stock and indirect emissions are taken into account. (<http://www.businessgreen.com/bg/analysis/2290553/do-the-governments-biomass-sustainability-criteria-go-far-enough> )  Yet DECC said that although “the plan is to eventually incorporate BEaC in the DECC’s main 2050 pathways calculator…BEaC is not a regulatory tool, and it will not replace the Biomass & Biogas Carbon Calculator (B2C2) available from the Ofgem website.”  **Unlike BEaC, B2C2 does not take account of carbon stock changes, unless a drastic change in land use, for example clearfelling of a forest and replacing it with arable land, takes place.**

Unless a full analysis is carried out on biomass fuels, so subsidies can be restricted to those that genuinely offer lower carbon emissions than the fossil alternatives, subsidies will increase, not decrease, CO2 emissions, warns Friends of the Earth’s biofuels campaigner Kenneth Richter.  “It is incomprehensible that under the new rules the burning of trees in power stations will be counted as “carbon neutral” despite the preliminary results of DECC’s own research showing that it can be worse for the climate than burning coal. Until comprehensive carbon accounting for biomass is introduced it risks driving climate change, not curbing it” <http://www.businessgreen.com/bg/analysis/2290553/do-the-governments-biomass-sustainability-criteria-go-far-enough>

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1. http://www.mckinsey.com/business-functions/sustainability-and-resource-productivity/our-insights/impact-of-the-financial-crisis-on-carbon-economics-version-21 [↑](#footnote-ref-1)
2. https://www.ipcc.ch/pdf/assessment-report/ar5/wg3/ipcc\_wg3\_ar5\_chapter9.pdf [↑](#footnote-ref-2)