

# GREEN SHOOTS

A CONSERVATIVE MANIFESTO  
FOR A GREENER AND MORE  
PROSPEROUS FUTURE

A detailed white line-art botanical illustration of various plants, including a tall stalk with small flowers, a dandelion seed head, a large umbellifer flower, and several other flowering species, set against a dark blue background.

CONSERVATIVE  
ENVIRONMENT  
NETWORK

# CONSERVATIVE ENVIRONMENT NETWORK

**The Conservative Environment Network (CEN)** is the independent forum for conservatives in the UK and around the world who support net zero, nature restoration, and resource security.

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# **GREEN SHOOTS**

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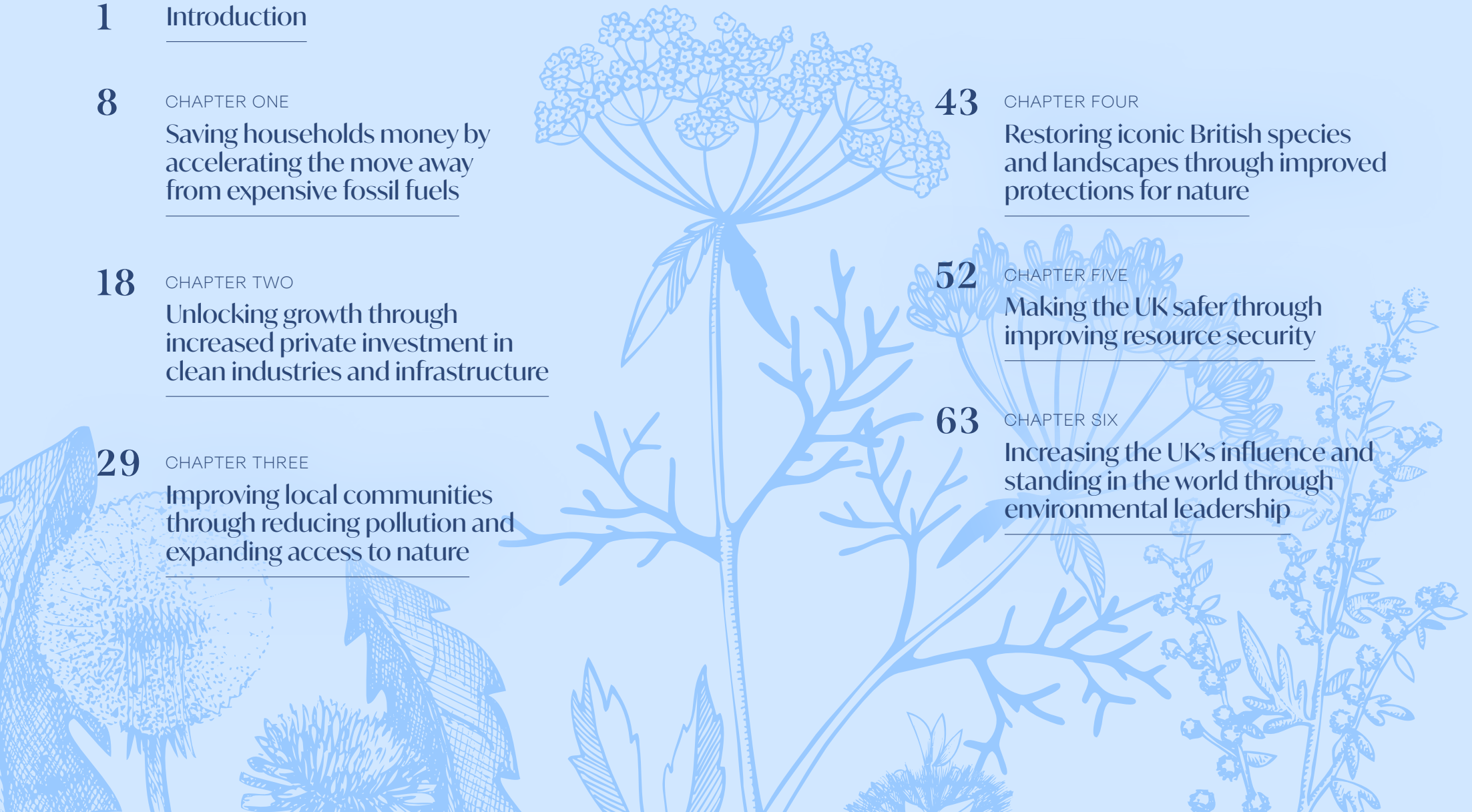
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# INTRODUCTION

Conservatives have a long political tradition of environmental action. Whether it was Margaret Thatcher warning the UN General Assembly about the dangers of climate change or Edmund Burke's articulation of each generation's responsibility to hand on a healthy environment to the next, conservative thinkers and leaders have championed our moral duty to be good stewards of our natural world for our children and grandchildren. This manifesto seeks to follow in that tradition.

There was substantial progress on the environment in the last parliament, delivered under a Conservative government and championed by CEN MPs and peers. This manifesto highlights some of the new policies, legislation, and fiscal measures on the environment that were put in place by conservative environmentalists. We reached the milestone of halving greenhouse gas emissions, relative to a 1990 baseline, while growing the economy by over 80% in the same period.<sup>1</sup> The most polluting fossil fuel, coal, is being banished from the electricity grid this year. Around 4.3 million square kilometres of marine environment are protected by the Blue Belt around the UK's Overseas Territories.<sup>2</sup> And developers must now ensure new homes leave nature in a better state. Conservatives should celebrate these achievements, lay claim to their legacy, and feel pride.

But there remains much more to do if we are to stop climate change and restore nature. Just under half of our emissions, from a 1990 baseline, still need to be eliminated to reach net zero. Most rivers

are not in a good ecological condition. Outcomes for nature inside protected areas are not improving fast enough. And air pollution limits continue to be exceeded in some towns and cities. Conservatives therefore need to set out a bold plan to tackle these environmental challenges in this parliament, building on our successes to date.

The environment is the quintessential conservative cause. Not only do we instinctively support environmental action because of our commitment to intergenerational responsibility, but we also believe that action on the environment is essential for economic prosperity and national security. Unchecked, climate change and biodiversity loss would cause a severe hit to our economy, such as damage to property and infrastructure from extreme weather or food shortages caused by poor quality soil and declining pollinators. They would also pose security risks, magnifying existing threats of global instability, conflict, and migration.<sup>3</sup> The cost of dealing with the long-term impacts of these threats will dwarf those of taking action to prevent them.

We also recognise it is a political imperative. Even in a tumultuous period for the economy and geopolitics, the environment consistently remained one of voters' top five concerns during the last parliament and reaching net zero and halting biodiversity loss have enjoyed large majorities of public support.<sup>4</sup> If conservatives are to avoid continuing to lose voters to the left, including younger voters who are especially environmentally conscious, an ambitious set of policies on the environment is a must. Conversely there is little evidence to suggest a platform of weakening environmental commitments would be capable of uniting traditional right-wing voters.

Polling carried out by the CT Group before the 2024 general election found the Conservative Party had lost nearly half of its 2019 voters to Reform UK and the Labour Party.<sup>5</sup> The research found that, among Conservative to Labour switchers, net zero was both popular

and salient, with 72% saying net zero would affect how they planned to vote. And while it found that attitudes to net zero were less favourable among Conservative to Reform switchers, immigration was by far the most salient issue (61% named immigration as the top issue that was determining their vote). This suggests a platform of reducing immigration and tackling climate change is likely to be the best strategy for winning back as many of the 2019 voter coalition as possible, rather than adopting Reform UK's position of scrapping net zero.

The recent general election showed that it is not sufficient to have a good record or even a list of good policies inside a manifesto. The centre-right must put forward a positive vision for the environment too. Some of the Conservative Party's greatest electoral triumphs in recent years, such as David Cameron's victory in 2010 and Boris Johnson's in 2019, came when the party offered voters a bold and ambitious environmental agenda. Conversely, 2024 shows the electoral limits of negative campaigning against environmental policies, focused solely on minimising the costs of action rather than seizing the opportunities of clean growth and avoiding costly environmental impacts. Conservatives must learn the lessons from these election results and provide a constructive opposition to Labour's more statist approach to the environment.

We firmly reject the idea that conservatives must sacrifice their support for free markets and limited government in order to tackle environmental threats. On the contrary, failing to act now would carry even greater costs, entailing greater state intervention and spending down the line. With a Labour government coming into power promising to create a state-owned energy company and increase public spending, it will not be enough for conservatives simply to oppose or to back similar policies on a slower timescale. The centre-right needs to

put forward a distinctive, ambitious, pro-environment alternative. That is what this manifesto seeks to achieve.

In developing the policies in this manifesto, we have sought to apply conservative principles and insights to environmental challenges. This means that policies should go with the grain of individual preferences and free markets and seek to empower communities, rather than forcing lifestyle choices on people or imposing top-down solutions. Environmental action should support economic growth, rather than aim at degrowth. Policy should focus on unlocking private investment in environmental solutions and new green industries, while letting the market innovate and scale technologies, rather than promoting state ownership and picking winners. While there is a role for public spending in this vision, it is necessarily limited to avoid crowding out private finance. While there were many examples of bold environmental policies from this recent period of Conservative government that took clear inspiration from these conservative principles, we have sought to show how an even more distinctly conservative approach to the environment could be developed over this parliament.

We have enormous opportunities post-Brexit to redesign environmental policies that drive better environmental outcomes and are tailored to our own national circumstances. The last government made a good start seizing these opportunities, especially with the rollout of Environmental Land Management schemes (ELMs), but there is more work to do. In the last parliament, ministers set strong long-term targets, which were vital for giving businesses the confidence to invest. However, the focus for this parliament must be on delivery, practicalities, and implementation. A Conservative opposition can play a critical role in holding a Labour government's feet to the fire on their environmental promises.



This manifesto was developed over nearly 12 months with input from across our network of parliamentarians, councillors, and grassroots supporters, as well as from businesses and campaigning organisations. Its length reflects both the range of interests of conservative environmentalists and the array of pressing environmental challenges that we face. We hope it provides a blueprint for how the next generation of conservative leaders can put the environment at the heart of our movement's agenda and offer to voters as they rebuild after the election defeat and plot a path back to power.

This manifesto proposes 91 different policies to create a brighter future for this and the next generation. Taken together, the policies will lower the cost of living, increase investment and growth, improve people's communities and quality of life, restore British nature, make the country safer, and boost our standing on the world stage. It is split into six chapters:

**Chapter one proposes policies to save households money by:** implementing pro-market reforms to accelerate the move away from expensive fossil fuels to clean energy; lowering the cost of electric vehicles (EVs) and EV charging; and incentivising improvements to home energy efficiency.

**Chapter two proposes policies to increase private investment in clean industries and infrastructure by:** speeding up the planning process for new infrastructure; improving the quality and affordability of public transport; attracting more green supply chain investment to the UK; and encouraging more private capital to flow into clean projects.

**Chapter three proposes policies to improve local communities by:** enhancing water quality and security; tackling littering and fly-tipping; helping more people access nature by making our gardens, homes,

and communities places where wildlife is thriving; and improving air quality.

**Chapter four proposes policies to safeguard British nature by:** tackling invasive species and wildlife crime, and reintroducing beavers and pine martens; creating private nature markets; and harnessing our Brexit freedoms to reform environmental regulations.

**Chapter five proposes policies to make the UK more resource secure by:** growing tree cover; increasing the diversity and capacity of our energy supply; strengthening our food security; and consuming and managing our resources more responsibly in order to build a more circular economy.

**Finally, chapter six proposes policies to boost the UK's international standing on the environment by:** extending our leadership position on global ocean conservation; removing trade barriers for clean goods and services; and supporting developing countries and UK Overseas Territories to finance action on climate change and biodiversity loss.

# THE POLICIES



1

Saving households  
money by accelerating  
the move away from  
expensive fossil fuels



Some of the most expensive policies in the last parliament were to support consumers with the high costs of fossil fuels, such as the Energy Price Guarantee and fuel duty cuts. Even when sourced domestically, the price of fossil fuels is inherently volatile, as they are linked to decisions made by autocratic regimes which control the world's largest reserves of oil and gas. The Office for Budget Responsibility estimates another gas price spike could add 13% of GDP to our national debt, if we maintain our current dependence on gas.<sup>6</sup> Only by accelerating the transition away from fossil fuels in the power, transport, and heating sectors can we deliver lower, more stable bills for consumers and greater energy security in this parliament, as well as make progress on tackling climate change. And only through market mechanisms, which incentivise private investment through price signals and encourage competition, can we deliver this transition at the lowest overall cost to the consumer and the economy.



### HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD

The reduction in benefit in kind company car tax rates has played a key role in the rapid growth of new EV sales which now comprise over 17% of the new car market in the UK, with the majority coming from fleets.<sup>7</sup> The Zero Emission Vehicle Mandate, a market mechanism with a system of tradable credits, will also drive EV uptake in the years ahead.

### CELEBRATING CEN CAMPAIGN WINS

VAT on energy efficiency measures and solar panels was eliminated in 2022 and the proposed hydrogen levy on electricity bills was scrapped during the passage of the Energy Act.

**Bring down the cost of electricity for households through a package of pro-market reforms to move away from gas, expand the supply of clean electricity infrastructure, and foster innovation, ensuring consumers benefit from the UK's world-leading rollout of renewable power.**

- **Move some green levies off electricity bills:** the ratio of electricity to gas prices is 4:1 in the UK, compared to a European average of 3:1.<sup>8</sup> This is in part because the vast majority of environmental and social levies are on electricity bills rather than gas bills. Rebalancing some of these levies from electricity to gas bills will help reduce this ratio. This will make electricity relatively less expensive compared to gas and ensure the running costs of a heat pump are lower than those of a gas boiler, as well as delivering savings for electric-only customers and encouraging the electrification of heating. If some levies are moved off electricity bills into general taxes at the same time, households with gas boilers will not see their dual fuel bills rise as a result of this rebalancing. There would be an additional cost to the exchequer from this measure of between £450 and £550 million per year.<sup>9</sup> However, these costs will start falling later in the 2020s as the early renewables subsidy contracts end, although the exchequer liability will rise to compensate remaining gas customers as more households switch to electric. For the average electric-only household with a heat pump, this could save up to £250 per year from household bills.<sup>10</sup>
- **Enable smart energy tariffs:** implementing 'half-hourly settlement' as planned for 2025 would enable suppliers to reflect the true cost of power generation at different times of the day in the prices they charge consumers. Alongside the completion of

the smart meter rollout and the adoption of smart appliances, this would enable energy suppliers to offer innovative, cheaper tariffs to customers for clean technologies, helping them do their washing or charge their EV for less money during periods of excess power supply if they choose. It would also optimise our energy system which is increasingly dominated by variable renewable generation and unlock greater use of demand-side response flexibility schemes, which are crucial for balancing the grid and lowering emissions and overall energy system costs. Ofgem estimates this could generate up to £4.5 billion of net benefits for consumers by 2045.<sup>11</sup> It is important this market-friendly reform is accompanied by targeted price protections for vulnerable customers, so lower income families are not priced out of consuming energy at peak times.

- **Double renewable energy capacity:** to get on track to decarbonise electricity by 2035, renewable energy capacity needs to roughly double by 2030.<sup>12</sup> Homegrown renewables will be the backbone of our future power system, lowering consumer bills when renewables' strike prices are lower than wholesale power prices, and protecting consumers from volatile international fossil fuel markets. The Contracts for Difference scheme has been hugely successful in attracting private investment, lowering financing costs, and encouraging competition between developers, and should be extended into this parliament and beyond. Annual auctions are vital for delivering a clean power system and for improving energy security at the lowest cost to the consumer, and should be given enough budget in this parliament to deliver the doubling of installed capacity. Incremental, market-based reform of the scheme to remove distortions and expose generators to more revenue risk should continue to be developed, in order to reduce curtailment

payments and incentivise more private investment in storage, without pushing up financing costs.

- **Reduce curtailment costs through building more grid infrastructure:** many clean energy projects are held back by long waiting times for grid connections, delaying cheap clean power from coming online and stabilising energy bills. Furthermore, the lack of grid infrastructure, especially between Scotland and England, is pushing up the bill for constraint payments for wind farms, which are paid to switch off during times of high wind and low demand. A report estimated this could cost up to £3.5 billion by 2030 unless tackled, equivalent to £200 extra per household bill.<sup>13</sup> To tackle this growing cost and save consumers money, the plans to accelerate new transmission infrastructure, which were first set out in the Winser Review and endorsed by the last government in the 2023 Autumn Statement, should be delivered as soon as possible.<sup>14</sup> New transmission lines between Scotland and England in particular should be prioritised, with new cables estimated to pay back the investment within two years in savings from curtailment payments.<sup>15</sup> Powers in the Energy Act to open up onshore transmission projects to competition should also be used, to speed up the grid rollout, encourage innovation, and lower prices. In addition, to enable more clean infrastructure to connect faster, Ofgem should be directed to allow distribution networks to invest in local grid upgrades ahead of projected demand.<sup>16</sup>

**Cut the cost of switching to an electric car, with tax incentives to make it more attractive for motorists to move away from petrol or diesel cars and helping to ease cost of living pressures, while tackling air pollution and climate change.**



- **Reduce VAT for on-street EV charging:** to improve fairness in the transition to EVs and increase uptake through lower taxes, the VAT rate for EV charge points should be equalised at 5%. This would ensure the public charge point VAT rate matches the rate paid by households with a driveway. It is estimated that 30% of households do not have access to off-street parking.<sup>17</sup> As a result, they could be paying up to £227 more per year to charge their vehicle.<sup>18</sup> To ensure charge point operators pass on the VAT reduction to motorists, an EV equivalent to the ‘pumpwatch’ scheme should be established, where operators have to publish their charging rates in a league table for drivers to compare prices. By the mid-2030s, this VAT equalisation could cost up to £1.1bn, so the lost revenue should be made up by the eventual fuel tax replacement for EVs.<sup>19</sup>
- **Maintain the lower company car tax rate for EVs:** the lower benefit-in-kind tax rate has been one of the main drivers of the UK’s EV transition so far. The tax break also explains why fleet purchases have come to dominate new car sales, making up nearly 64% of the market in 2024 to date.<sup>20</sup> These fleet vehicles feed into the second-hand market, helping to make EV ownership more affordable for the 80% of drivers who buy used cars. The lower rate should be maintained for the duration of the next parliament. Standardised battery health certificates should also be a requirement for the sale of second-hand EVs, to build consumer confidence in battery longevity and keep insurance premiums down.
- **Defend the free trade in EVs:** the upfront costs of EVs are falling but are still more expensive than a petrol or diesel car on average, despite lower overall costs of ownership. To boost EV uptake, they need to be cheap and convenient with more

budget options for drivers. The EU's 38% tariff on imported Chinese EVs threatens to push up the price of less expensive models and deter lower-income households from purchasing them. As conservatives we should defend free trade as a way to drive competition, increase efficiencies, and lower costs for businesses and consumers. Of course, free trade only succeeds where genuine comparative advantages are exploited, so the government should be ready to act where illegal and exploitative practices undermine this. To tackle concerns about the provenance and sustainability of imported EVs, a 'global battery passport' could be adopted to increase transparency across battery supply chains.<sup>21</sup> Under the UK-EU Trade and Cooperation Agreement (TCA), new 'rules of origin' requirements from 2027 will place a 10% tariff on EVs where 55% of their components were produced outside the trading bloc. The three-year postponement of these rules is estimated to save manufacturers and consumers £4.3 billion.<sup>22</sup> At the review of the TCA in 2026, the UK should seek to permanently suspend these onerously high rules of origin requirements to maintain zero tariffs on EVs, whilst continuing to invest in our domestic battery manufacturing capacity.

**Upgrade the energy efficiency of millions of extra properties across the UK through a mixture of tax incentives, private finance mechanisms, and simpler government schemes, to make heating cheaper, tackle energy waste, reduce reliance on imported gas, and lower emissions from homes.**

- **Create new energy efficiency tax incentives:** we need new incentives to encourage energy efficiency improvements in the owner occupier and private rented sectors. Research suggests that households in an average property with an EPC rating of D paid £235 per year more than band C properties, showing the potential of energy efficiency to cut people's bills and ease the cost of living.<sup>23</sup> Tax incentives are voluntary for households, go with the grain of consumer behaviour, involve less administration than complex government grant schemes, and should be combined with innovative green lending products to leverage private capital for home upgrades. These incentives could include creating a stamp duty rebate for homes that are retrofitted within two years of purchase, creating an employee benefit scheme for home energy efficiency improvements, and allowing landlords to deduct the costs of energy efficiency improvements from their tax liability. Stamp duty reform could be designed to be revenue neutral to Treasury. To target these tax cuts more effectively, the system of Energy Performance Certificates (EPCs) should be reformed to measure energy efficiency as opposed to cost.
- **Unlock more green finance for home upgrades:** to upgrade our homes and ensure they waste less energy, we need to substantially increase investment in home energy retrofits in this parliament. It would not be fiscally responsible for the majority of this investment to be provided by the public purse, which is why novel private finance mechanisms, alongside tax incentives to encourage demand, are needed. Firstly, consumer credit legislation should be amended to enable property-linked finance for energy efficiency improvements. Currently, some households are put off from investing in upgrades due to long payback periods of the measures. Enabling homeowners

to tie their energy efficiency loan repayments to properties rather than themselves will encourage more homeowners to finance improvements.<sup>24</sup> A further change to the legislation could be to remove the liability of lenders for actions of third parties, such as installers, which currently holds back some lenders offering green loans. In addition, households should be allowed to add an extra storey to their homes, without seeking planning permission, provided it is in keeping with the original architectural style of the building and that they improve the energy efficiency levels of the whole property.<sup>25</sup>

- **Liberalise the retail energy market:** innovation in the retail market to deliver net zero more affordably and conveniently is being stymied by excessive red tape. Ditching the requirement for a supplier licence for heating loads, for example, would enable distinct heat pump tariff offers.<sup>26</sup> Removing some of these regulations in the retail market would unlock more competition between suppliers, open up the market for new innovations that cannot meet current licensing conditions, and enable more ‘energy as a service’ tariffs.
- **Cut red tape in energy efficiency and clean heating schemes:** government energy efficiency grant schemes have not delivered as many home improvements as expected. The Energy Company Obligation scheme is behind schedule with only 8% of the anticipated 450,000 energy efficiency upgrades taking place in the first year of the four year scheme.<sup>27</sup> This delay is predominantly due to complexities in identifying households that can meet the minimum uplift requirements of the scheme. Relaxing the targeting requirements for the Energy Company Obligation scheme and ending the competitive bidding element of the public sector decarbonisation funding will help free

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up more resources for energy efficiency measures instead of overheads. Similarly, broadening the definition of 'energy saving material' covered by the VAT exemption to include other forms of zero-carbon heating, such as electric heat batteries, would enable greater consumer choice and technological innovation for decarbonising home heating. A more technology-neutral approach to the Clean Heat Market Mechanism should also be developed in this parliament, to lower costs.

2

Unlocking growth  
through increased  
private investment in  
clean industries and  
infrastructure



**A**chieving net zero will require significant investment in new industries and infrastructure. Much of this investment will flow into the UK's traditional industrial heartlands, where the last Conservative government rightly sought to level up opportunity. There was important progress in the final stages of the last parliament on streamlining critical national infrastructure planning processes and increasing investment allowances for new technologies and factories. Business models for carbon capture and clean hydrogen were created to enable private sector finance to establish and grow these new industries. The UK's net zero economy is already worth £74 billion, having grown 9% in 2023, and offers significant growth potential in the years ahead.<sup>28</sup> In this parliament, investment will need to increase further; however, to limit the impact on the public finances and to harness market forces to lower overall costs, the vast majority of the increase can and should come from the private sector. To unlock this investment, even more barriers to private investment, from cumbersome planning processes to poor transport links, will need to be removed.

### HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD

There has been a huge expansion of offshore wind over the past 10 years, with the UK having the five biggest offshore wind farms in the world. This has been underpinned by the Contracts for Difference scheme, a market-based mechanism that has cut prices by two thirds and attracted billions of pounds of renewables investment since 2014.<sup>29</sup> Climate risk reporting has also been introduced for listed companies and financial institutions increasing investor awareness of climate change risks to businesses and boosting flows of capital to green projects.<sup>30</sup>



### CELEBRATING CEN CAMPAIGN WINS

CEN MP Energy Act amendments led to the lifting of the 'one person veto' in the English onshore wind planning regime and the creation of a sustainable aviation fuel revenue stability mechanism.

**Speed up the delivery of productivity-enhancing clean infrastructure projects, such as wind farms, solar farms, and nuclear plants, through planning reforms, lowering the administrative burden for the private sector in building environmentally-beneficial projects and bringing much-needed new capacity to our energy and transport systems online faster.**

- **Expand permitted development rights for clean technologies:** the planning system is adding delays and costs to the deployment of clean technologies. The last government had proposed several measures to reduce unnecessary planning red tape by extending permitted development rights for some clean technologies. These included: scrapping the requirement for planning permission for heat pumps within one metre of a property boundary, expanding electric vehicle charge point permitted development rights, and creating a permitted development right for small-scale wind turbines. These proposals should be implemented as soon as possible in this parliament, to make it cheaper and faster to deploy these clean technologies. Permitted development rights for heat pumps should also be extended to air-to-air heat pumps, as well as air-to-water heat pumps, as they are also capable of air conditioning and can therefore support our adaptation to a warmer climate.



- **Make community benefits mandatory for new grid and generation infrastructure:** developers are increasingly using benefits like energy bill discounts or funding for local projects to build support for new energy infrastructure among residents. The previous government published guidance on community benefits for new transmission infrastructure, which cited research showing that 78% of people would find transmission infrastructure acceptable if they received discounts on their energy bills.<sup>31</sup> This should be extended to generation too and a minimal level of community benefits mandated, through changes to the National Planning Policy Framework.<sup>32</sup> Alongside careful community engagement, this approach would improve consistency across the UK for developers, speed up the process of negotiating community benefits, and provide reassurance to local communities who are set to host more wind farms, solar farms, and pylons as we modernise the energy system.
- **Increase the certainty, speed, and flexibility of the planning system for new clean infrastructure projects:** national planning policy for new nuclear has not been updated for the past thirteen years despite the technological advances made, notably the jump from conventional to small modular reactors.<sup>33</sup> The last government published a consultation which closed in March 2024, which included a strategy for where reactors would be sited.<sup>34</sup> A response should be issued as soon as possible to provide developers with the confidence to invest in new nuclear projects. More broadly, national planning statements for energy projects should be regularly updated to reflect the latest technological developments. The Energy Act introduced reforms to environmental rules to allow offshore wind developers to strategically mitigate environmental impacts across multiple projects, rather than project-by-project. Similar reforms should

be created for all clean infrastructure projects, to accelerate the buildout of clean energy, lower costs, and unlock more funding for nature.

**Expand the number of bus and rail services while improving the passenger experience and lowering fares, through unlocking more private investment and increasing competition, to help level up the UK, improve productivity, and boost connectivity.**

- **Make rail electrification investment more consistent:** long-distance electric trains are 40% more reliable than diesel trains, yet the UK has only electrified 38% of its rail network, which is well below the EU's share of nearly 57%.<sup>35</sup> Electrification also makes train travel cheaper and cleaner, increases capacity on the line, and enables greater volumes of freight, with electric trains capable of moving larger loads than diesel trains. But we need to ensure there is a consistent stream of rail electrification spending to enable the private sector to invest in the supply chain sustainably. A rolling programme of electrification should be announced for this parliament, ending the current 'feast and famine' approach.<sup>36</sup>
- **Use land value capture to boost private investment in rail infrastructure:** there is substantial opportunity to use land value capture from the development of new rail connections to fund part of the costs of the infrastructure. It was successfully used to fund 25-30% of the capital costs of the reopening of a passenger rail line in Northumbria.<sup>37</sup> The model would see the government take some of the uplift in property values (residential and commercial) from the new transport link, and direct the funding towards rail infrastructure investment. This will make the

limited public investment budget for new rail infrastructure go further. Another revenue generation opportunity would be to sell retail spaces and residential housing units as part of station redevelopments to fund part of the infrastructure costs.

- **Increase competition between train operators:** increasingly electrified trains offer a greener alternative to driving or flying, helping us tackle air pollution and climate change. Privatised railways have seen rising passenger demand: before the pandemic hit, the railways delivered a third more journeys than before privatisation.<sup>38</sup> But the relatively high cost of train fares is stopping more people choosing this sustainable transport mode. To bring down rail prices, the government should turbocharge competition between private providers, rather than create a nationalised rail company. Competitive contract procurement should be delivered on key routes, which will boost competition in the sector after it had declined under the old franchising model. In addition, a duty should be placed on Network Rail to prioritise open access operator applications to increase competition on the railways where there is spare capacity, incentivising operators to drive down fares and improve the customer experience. This should include international lines, namely HS1. Where on-track competition has been introduced across Europe, fares have been reduced by 20-60% over time.<sup>39</sup>
- **Enable councils to adopt flexible franchising models for local bus services:** more combined authorities are considering the full franchising of local buses, where services are effectively brought under the control of local authorities who also take on revenue risk from private operators. But the cost of this option is prohibitive for many authorities, with Greater Manchester's franchising system involving £135 million in set-up costs.<sup>40</sup>

Under an alternative ‘flexible franchising’ model, the private sector assumes the revenue risk from operating bus routes and shares profits with councils, in return for minimal subsidy. The quid pro quo is that the councils can set service requirements, to ensure consistency and good quality. Another benefit of partial franchising is that it enables better join-up between local transport services, from buses to rail, which is currently held back by competition rules.

- **Reforms the Bus Service Operators Grant (BSOG):** the BSOG helps to maintain regular and affordable bus services for communities, expanding people’s sustainable transport choices, but it subsidises services on a per litre basis. The subsidy mechanism disincentivises the switch to electric buses. Instead subsidies should be awarded per kilometre travelled and should add conditionality terms to operators to receive funding, such as the uptake of zero-emission buses, better bus timetabling, and integrated ticketing. This will incentivise operators to support the delivery of environmental objectives and improve passenger experience.

**Make the UK the most attractive destination in Europe to grow green industry supply chains, through tax incentives, planning reforms, infrastructure upgrades, and revenue de-risking mechanisms, helping British firms seize the opportunities from the global net zero transition, creating well-paying jobs, and regenerating local economies.**

- **Strengthen tax breaks inside freeports for green investment:** turbocharging green investment incentives inside freeports will make the UK more competitive, boost job creation, and

regenerate industrial heartlands. After Brexit, repatriated powers around trade policy and regulation have enabled the UK to establish a number of freeports. These zones have already used their favourable tax regime to attract green supply chain firms to the UK, such as SeAH's wind turbine base factory in Teesside and Pensana's rare earth processing facility in Hull. To build on this success, a green premium should be added to the existing tax breaks inside freeports to incentivise low-carbon investment in these areas and fund the training of workers for local green industries. In addition, on-site renewable energy generation should be expedited in these zones with looser planning rules and streamlined environmental permitting, to give businesses access to cheap power and make them more competitive. This will strengthen the UK's attractiveness for international green supply chain investment in response to the generous subsidies on offer through the USA's Inflation Reduction Act and EU's Green Industrial Plan. It also offers a conservative alternative to the left's green industrial strategy.

- **Upgrade British ports for offshore wind:** the UK is a world leader in fixed-bottom offshore wind and has an early-mover advantage in floating offshore wind. Combining natural advantages, like high wind speeds and a long coastline, with our offshore energy experience and know-how, the UK is well-placed to develop and commercialise these key clean technologies. Exporting these technologies will make the UK more prosperous and decarbonisation cheaper for developing countries. Yet we risk failing to capitalise on the economic opportunities in the supply chain, estimated to be worth £92 billion by 2040 to the UK, due to our poor port infrastructure.<sup>41</sup> The port upgrades required for floating offshore wind in particular are very significant, as most of the manufacturing and assembly will need

to be done in the port. Ports have not invested to date primarily because of future revenue uncertainty as well as planning delays. To overcome this barrier, a revenue certainty scheme for ports should be created, to enable them to invest with confidence in new facilities, expand capacity, and deepen their harbours to manage increasingly large offshore wind infrastructure. In addition, planning permission for upgrading ports for offshore wind should be fast-tracked.

- **Expand domestic sustainable aviation fuel (SAF) production:** the adoption of SAF, which is made from waste products, will reduce the lifecycle carbon emissions of aviation by around 70% while zero-carbon aviation technologies are developed.<sup>42</sup> SAF will help aviation play its necessary role in decarbonising the economy, with estimates suggesting its production could create 10,350 jobs in the UK.<sup>43</sup> The last government committed to having five UK SAF plants under construction by 2025 and to deliver an industry-funded revenue certainty mechanism to de-risk SAF production. To ensure we do not end up importing SAF to deliver the government's SAF mandate, a revenue certainty mechanism should be legislated for swiftly in this parliament, favouring the competitively allocated Contracts for Difference scheme in the consultation to minimise costs for the sector.<sup>44</sup> Restrictions on the practice of tankering, whereby airlines take on excess fuel to cover both outbound and return flights to save money, should also be explored, to prevent airlines avoiding the SAF mandate and undermining this nascent market, and to reduce wasted fuel.

**Unlock more private capital for green industries through technology-neutral market mechanisms and sustainable finance policies, reducing the burden on the taxpayer to finance the upfront costs of the net zero transition, encouraging more clean technology innovation, and charting a distinctive centre-right approach to decarbonisation.**

- **Require listed companies, asset managers, asset owners, and large companies to publish transition plans:** the last government committed to require listed companies and financial institutions to publish a transition plan to reach net zero across their operations and investments. This announcement at COP26 was an example of UK world leadership in efforts to green the financial system and helped to put the City of London at the forefront of green finance. This commitment should be delivered, and the requirement extended to all large companies. This would help more private finance flow into tackling climate change, be a more market-friendly way to decarbonise than specifying how companies should align with net zero, and preserve financial stability by minimising the financial risks associated with climate change. The disclosure of transition plans should follow the gold standard template as set out by the Transition Plan Taskforce.<sup>45</sup>
- **Expand carbon pricing:** pricing carbon is one of the most free market, cost-effective, and economically efficient ways of tackling climate change, which minimises the need for excessive state subsidies and regulation and avoids picking winners. It also provides an important source of revenue for the Treasury, ensuring decarbonisation is fiscally responsible. The UK played a leading role in developing the early carbon markets and is now

continuing its leadership position outside the EU by developing the world's first net zero-aligned emissions trading scheme (ETS). To enable even more efficient decarbonisation, the number of sectors covered by the ETS should continue to be widened, with greenhouse gas removals (both engineered and natural) phased in over time with appropriate regulatory safeguards to ensure the integrity of the market is maintained. To do this, it will be important to maintain UK sovereignty over the sectoral scope of carbon pricing.

- **Support heavy industry to decarbonise:** the Energy Act created subsidy contracts to support the production and transmission of low-carbon hydrogen and the development of carbon capture and storage (CCS), which are important technologies for decarbonising heavy industry. This support should be delivered as soon as possible inside the three main industrial clusters to enable the necessary infrastructure upgrades to begin and avoid losing our head-start in these industries. Outside the clusters, however, a more technologically-neutral, market-based approach to supporting heavy industry to decarbonise should be developed to reduce costs, avoid picking winners, and accelerate innovation in solutions. To this end, industry should be offered support to decarbonise through electrification, which may be a more cost-effective option in some sectors and have lower residual greenhouse gas emissions than CCS and hydrogen.



# 3

Improving local communities through reducing pollution and expanding access to nature



**S**ir Roger Scruton described the conservative instinct to care for our communities as ‘oikophilia’, or ‘love of home.’ This drive explains why conservatives understand intuitively the imperative of protecting and enhancing our local rivers, woodlands, and wetlands, and maintaining a clean, healthy environment. Improving these local natural assets can deliver immediate and tangible benefits to people and enhance their quality of life. During the last parliament, unprecedented action was taken to improve local environments through new legislation and policies. But in this parliament, there is much more to do to safeguard important habitats, clean up our water and air, and widen access to nature, all the while building the many more homes that are needed.



### HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD

The Environment Act was passed, with new legal targets and principles to drive continuous improvements to the natural environment, a green watchdog to ensure commitments are met, and a suite of new policy levers to deliver the targets.

### CELEBRATING CEN CAMPAIGN WINS

Thirteen of the 18 policy asks from our water manifesto were adopted in the last government’s Plan for Water, including the headline asks of lifting the cap on civil fines and ring-fencing fine revenue for water improvements.<sup>46</sup>

**Restore a network of clean, healthy waterways, tackling all sources of water pollution, enabling more people to enjoy their local rivers and beaches, and ensuring sufficient supplies of water for people, farming, and nature.**

- **Require new developments to have sustainable drainage systems (SuDS):** in the last parliament, the Plan for Water contained a commitment to require all new homes to deploy environmentally-friendly techniques to manage surface water drainage, rather than connecting automatically to the sewerage network. SuDS improve water quality, reduce flood risk, and create more habitat for wildlife in our towns and cities. They work by using vegetation to slow down and absorb excess water and examples include green roofs, ponds, wetlands, and rain gardens. This commitment should be rapidly implemented.
- **Use water company fines to restore natural river systems:** the top pressure on English watercourses is not sewage or agricultural run-off, but the ‘physical modification’ of natural waterways, for instance through the creation of dams or weirs.<sup>47</sup> Yet there are no schemes to reward land managers who choose to remove these artificial modifications harming our rivers, where they no longer serve an economic purpose. The last government announced that revenue from water company fines would be ring-fenced by the Treasury for environmental projects. In this parliament, the money should fund a nationwide set of projects to restore the natural functioning of our river systems, including the removal of dams, culverts, and weirs and the re-wiggling of rivers.
- **Establish an industry-funded task force for fighting fatbergs:** under a model similar to the chewing gum task force in the last parliament, producers of FOG (fats, oil, greases), wet wipes, and other commonly mis-flushed items should be invited to contribute annually to a funding pot. The pot would be governed by a task force involving industry, water companies, civil society, and experts who would allocate funding for

unblocking pipes and local projects, start-ups, and research that address this pollution source. The task force would also work with the government to devise a more effective and informative product label to raise consumer awareness.

- **Build new reservoirs across the UK:** with hosepipe bans now a regular feature of British summertime and no new reservoir built in the UK since 1991, we urgently need to build more reservoirs. New reservoirs will help us meet rising demand for water, support food security, and protect the natural environment, in the face of a growing population and climate change. Yet they are currently held back by localised opposition, a slow planning process, and uncertainty over whether the regulator Ofwat will authorise the investments. The government should explore letting water firms use novel financing mechanisms to build these reservoirs more cheaply, such as the regulated asset base model used by the Tideway Tunnel, which would require small amendments to the Specified Infrastructure Project regulations of 2013. This model could lower the financing costs by reducing the political risk for investors while spreading the costs over the multiple generations who will benefit from the infrastructure.
- **Require washing machine producers to include a microplastic filter in every machine:** fossil fuel-based materials, such as acrylic and polyester, shed microplastic fibres when they are washed. Technologies are emerging to capture these fibres before they even leave the washing machine, and should be required as standard. This would reduce microplastic pollution in watercourses, which pollute the natural environment and can harm biodiversity and human health.<sup>48</sup>
- **Reform the bathing water regime:** the existing bathing water system is in need of reform. The application process is long-

winded, time-intensive, and lacking transparency, and there is widespread confusion about the purpose of the designation, as bathing waters are not necessarily of swimmable quality. Instead, bathing water status is an important way for those who regularly swim or spend time near rivers or beaches to get accurate information about water quality, but is limited both in the scope of pollutants tested and in length, as testing takes place in the limited bathing water season. The system needs to be improved so that the designation means something more substantive, the application process is clearer and recognises that some biodiversity-rich stretches of water may be inappropriate for bathing, and the monitoring is done all year round to more realistically reflect usage.

- **Adopt more nature-friendly and catchment-based regulation of the water sector:** the government should reform legacy EU water regulation to drive stronger economic growth and more innovation, while improving water quality and nature. Current water regulation is overly prescriptive and output-based, with companies required to develop a vast array of different plans and strategies for the water environment. Moving to a more outcome-based approach to water regulation, with new catchment-level targets, plans, and governance to reduce different pollutants, would increase flexibility, tailor solutions to local priorities, rationalise regulations, reduce the costs of compliance, and encourage innovation, while ensuring the full range of pollutants is reduced.<sup>49</sup> This comprehensive approach will become essential as other, new sources of pollution continue to be uncovered, such as the growing concern and recognition of the threat posed by so-called ‘forever chemicals’ and microplastics. New water regulation should specifically encourage private funding for nature-based solutions, such as

wetland creation, river re-wiggling, and regenerative farming, which enhance wildlife as well as improving water quality. Ministers should ensure regulators have clear guidance that encourages them to authorise nature-based solutions to meet the new outcome-based regulatory requirements.

## Clean up our high streets with new measures to tackle littering and fly-tipping, giving people more pride in place and tackling harm to wildlife from littered items.

- **Replicate the Chewing Gum Task Force for other commonly littered items:** the government should emulate the model of the Chewing Gum Task Force of pressuring private companies to take more responsibility for commonly littered items they produce. Ministers should establish other broad stakeholder task forces to get private sector funding to support councils to tackle other key sources of litter, fly-tipping, and waste that will not be directly dealt with through existing or incoming policies, such as cigarette butts. Cleaning up cigarette butts currently costs taxpayers £40 million a year and they are the single most littered item, making up 68% of the total.<sup>50</sup>
- **Deliver the promised transformation of the waste management system:** holistic improvements to the waste system, such as the introduction of an extended producer responsibility scheme for packaging, the deposit return scheme for drinks containers, and reforms to standardise the waste that can be collected across local authorities in England, have the potential to both drive up plateauing recycling rates across England, making our communities cleaner and tidier and transferring responsibility and ambition for resource efficiency over to the private sector. A UK-wide deposit return scheme

could also help to tackle littering, by incentivising people to return containers to shops rather than discarding them. These reforms should be implemented as soon as possible in consultation with the businesses that will be critical for their successful execution.

- **Introduce extended producer responsibility (EPR) schemes for commonly fly-tipped items, like mattresses:** the cost of cleaning up large fly-tipped items to English local authorities in 2022/23 was over £13 million.<sup>51</sup> Introducing EPR for these products, where the manufacturers would bear the costs of managing the fly-tipped items rather than councils, would reduce financial pressures on the public sector and give manufacturers an incentive to offer collection services.

### **Make our gardens, homes, communities, and most treasured landscapes places where wildlife can thrive and where nature is more accessible to people, benefiting our mental and physical health and fostering a love of biodiversity.**

- **Tax the use of artificial grass in domestic gardens:** there is substantial evidence that artificial grass is harmful for soils, insects, earthworms, and other garden wildlife, exacerbates surface water flooding, and creates microplastic pollution. Despite being favoured by some for the lower maintenance requirements, it still needs regular cleaning and must be replaced every 8-15 years.<sup>52</sup> There may be some cases where artificial grass is necessary, so rather than a ban, a ‘polluter pays’ tax on the sale of artificial grass for domestic gardens, at a level that is proportional to the environmental harm it causes, should be developed.

- **Legislate to end the use of peat products in horticulture:** following the failure of the voluntary approach to phase out horticultural peat, legislation for a legal ban should be urgently introduced. This will help to protect the world's largest terrestrial carbon store, storing more carbon than all other vegetation types combined.<sup>53</sup> Harmful practices, including peat extraction for horticulture, mean that 87% of the UK's peatlands are in degraded condition.<sup>54</sup> Given that affordable alternatives to peat compost are already available, a ban would give gardeners confidence when buying pre-potted plants that they are not contributing to harmful peat extraction. While a ban should be brought in as soon as possible for amateur gardeners, it should be phased in over a longer period for the professional horticultural sector, as suitable alternatives for some industries are still in development.
- **Require swift bricks in appropriate new build homes:** iconic cavity-nesting birds are in decline in the UK due to habitat loss and modern building methods, with swift populations estimated to have fallen by 60% since 1995.<sup>55</sup> While not suitable for every home given many buildings do not use bricks, swift bricks could provide important habitat for endangered, migratory cavity-nesting birds like the swift and sparrow, and could be mandated very cheaply with specialist bricks costing around £30.<sup>56</sup>
- **Cut red tape to make it easier to plant street trees:** street trees provide a host of benefits, from keeping cities cool and sequestering carbon, to absorbing air pollutants and improving our mental health. Yet there remain regulatory barriers to councils planting more of them in our towns and cities. The Highways Act 1980 in particular restricts councils' ability to plant street trees and places an overwhelming priority on maintaining



vehicle flow.<sup>57</sup> This piece of legislation should be reformed, with updated guidance for councils on what types of vegetation are appropriate on which roads. Similarly, interspersing street trees within parking bays should be made easier, by ending the costly requirement for councils to amend Traffic Regulation Orders.

- **Extend ‘full expensing’ to developments on brownfield sites:** building more homes on brownfield sites will help protect green spaces and enhance biodiversity, while also expanding housing supply and creating more communities that are walkable and cyclable. Extending the full expensing policy, announced in the Spring Budget 2023 and made permanent in the Autumn Statement 2023, to brownfield developments would enable developers to deduct the investment costs of new homes from their tax liability, helping make more brownfield sites viable. It is estimated this could lead to an extra 150,000 brownfield houses being started per year, with a long-term gain of £4.3 billion in downstream tax from the growth of the sector and economic development near brownfield sites.<sup>58</sup> Additional housing units on brownfield land would also mean more biodiversity net gain funding from developers that could support local nature recovery priorities.
- **Ensure protected landscapes contribute to nature recovery:** national parks and national landscapes encompass our country’s most treasured areas of countryside and provide one of the main opportunities for people to spend time in nature, yet too often the outcomes for biodiversity are poor inside them. A startling statistic is that 26% of sites of special scientific interest are in favourable condition inside England’s national parks, compared to 39% for England as a whole.<sup>59</sup> The last government made a welcome amendment to the Levelling Up and Regeneration

Act in 2023, which required the park authorities to produce updated management plans and placed a duty on public bodies to support the delivery of these plans. The guidance and secondary legislation to implement these new duties and clarify the biodiversity remit of protected landscapes should be swiftly passed in this parliament, so that the many visitors to these areas can enjoy more biodiversity as well as beautiful landscapes.

- **Create local nature recovery zones around towns and cities:** through new Local Nature Recovery Strategies, local authorities are identifying opportunities for nature recovery in villages, towns, and cities across England, restoring our natural inheritance and ensuring people have access to vibrant and abundant biodiversity near to their homes. The ambitions of these local nature recovery zones should be delivered through blending funding from biodiversity net gain, the community infrastructure levy, the flood defences budget (through natural flood management schemes), water company business plans, and a successor to the Green Recovery Challenge Fund. The zones should encompass not only larger-scale projects, but a range of smaller urban and semi-urban habitats, from roadside verges, street trees, and rain gardens, to old cemeteries, wetlands, and pocket parks. The funding should also be made available to community groups, to support the ‘little platoons’ seeking to deliver the aspirations of Local Nature Recovery Strategies and to improve nature near to their homes. At the same time, statutory guidance for councils should be updated to empower them to manage these green spaces for nature (for instance, by not over-mowing verges, establishing wilder margins around playing fields, rewilding under-used areas of public land, and planting more street trees along local authority-controlled roads).<sup>60</sup>

- **Let community groups buy disused public land at a discount for nature recovery:** local volunteers are the unsung heroes of nature recovery, putting in countless hours to manage and improve local nature reserves and raise funds for conservation projects in their communities. But high land prices can make it prohibitively expensive for local nature groups to start new projects or expand existing sites. That is why they should be given a discount when buying disused public land, which is not suitable for development, for projects with the purpose of restoring nature near to where people live. Furthermore, to help more groups with raising the capital to buy new sites, the Community Ownership fund should be renewed for this parliament, and nature recovery projects should be made eligible to apply.

**Improve air quality across the UK and encourage more walkable and cyclable housing developments, improving people's quality of life, supporting the high street, enhancing our communities, and offering more green transport options.**

- **Create a capital budget for active travel infrastructure:** active travel infrastructure, when it is carefully consulted on with local residents, can expand people's transport choices and make cycling and walking safer and more attractive for people. In cities where land is scarce and expensive, it can be a more efficient way to move people around, with research showing the same 3.5 metre wide lane can move over four times as many people by foot or bicycle as it can by car.<sup>61</sup> Decisions about active travel infrastructure and other traffic management schemes, such as 20mph zones, are best made at the local level by politicians who

know their communities best and who can be held accountable by residents. Councils should be helped to measure resident approval for new schemes to ensure there is local consent. A significant share of new active travel funding should be targeted on building more cycle paths to schools and installing more school street schemes, where roads are closed to polluting cars around pick-up and drop-off times to protect children's health and safety. This targeted approach to active travel infrastructure helps to build local support for schemes, protect a vulnerable group, and embed sustainable travel habits at a younger age.

- **Relax licensing laws around al-fresco dining and devolve powers to councils to set their own licensing fees:** Covid-era relaxation of licensing laws should be made permanent, so that councils can more easily allow local businesses to offer al fresco dining as part of business-friendly pedestrianisation zones. In addition, given there is a lack of capacity in many licensing departments which is slowing down councils from processing applications, councils should be allowed to set their own fees for licensing through changes to the Licensing Act. These schemes were popular during the pandemic and are a pro-business way to clean up pollution on busy high streets, while encouraging more footfall for local shops. Evidence suggests retail sales increase by an average of 30% following projects that improve pedestrian, cycling, or public transport access to shops.<sup>62</sup>
- **Legalise and regulate e-scooters and micro-EVs for use on roads:** expanding trials of e-scooter hire schemes and legalising these zero-emission, micro-mobility technologies for private use would expand transport choice for the 71% of journeys that are under 5 miles.<sup>63</sup> This would also lower transport costs for people, improve air quality, and reduce congestion for motorists.

However, their usage would need to be regulated carefully, to ensure safety of pedestrians and riders and to tackle the problem of street clutter where they are parked.

- **Improve planning for freight consolidation infrastructure:** vans and lorries delivering goods make a sizable contribution to air pollution in urban areas and to greenhouse gas emissions. Freight consolidation can ease the pollution and congestion impact from vehicles completing ‘last mile’ delivery journeys.<sup>64</sup> Yet they have significant land requirements, and need to be sited next to critical transport infrastructure. Creating a favourable planning policy on freight infrastructure in the National Planning Policy Framework could help secure planning approval for more freight hubs in cities, including consolidation centres for smaller, lighter, and less polluting vehicles to complete the last mile in more densely populated areas and the associated electric charge point infrastructure.
- **Inform people about the sources, risks, and existing regulations around air pollution:** some interventions on air pollution are contentious because of limited public awareness of the health and environmental risks, so the government should have a major national communication campaign, including advertising, signposts, and product labelling, to inform people about the risks of wood burning stoves, idling cars, indoor air pollution, and driving to schools, to name a few examples. Furthermore, existing laws that prohibit idling and the burning of certain polluting fuels in stoves should be better advertised and enforced.
- **Encourage more gentle density housing developments:** there is substantial evidence that gentle density developments, where people can easily move around by walking or cycling,

are typically more desirable and prosperous.<sup>65</sup> There are some significant opportunities to boost gentle density developments. Post-war estates in the UK are typically built to much lower densities than their European equivalents. Estate regeneration offers a way to increase densities sensitively, enabling more cyclable and walkable communities, while funding higher energy efficiency standards and an increase in social housing units through the sale of additional private housing units on the same site. Similarly, local rules imposing high minimum car parking spaces per dwelling, which hold back densification and limit new housing supply, should be relaxed.<sup>66</sup> Another gentle density measure would be to implement the street votes legislation, which would allow a street's residents to vote on whether to give themselves planning permission to add additional storeys to their property in line with a strict design code. The enabling secondary legislation should be passed as soon as possible.

# 4

## Restoring iconic British species and landscapes through improved protections for nature



**T**he UK is among the most nature-depleted countries in the world. Successive generations have overseen a deterioration of our natural inheritance and biodiversity indicators are still going in the wrong direction. The most recent State of Nature report found that populations of key species have declined by 19% since 1970 and one in six species is threatened with extinction.<sup>67</sup> Despite this, pockets of globally significant wildlife and habitats remain across our wild isles, such as our puffin population and our chalk streams, and we have some notable conservation success stories like the red kite. This should give us hope we can turn things around. Brexit has repatriated many of the key levers to protect and restore nature such as environmental regulation, fishing quotas, and farm payments. Despite some major initiatives in the last parliament, further action is urgently needed in this parliament to halt the decline in biodiversity and safeguard our nature for future generations.



### **HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD**

Three highly protected marine areas were created in English waters; and a new biodiversity net gain obligation came into force, to ensure all new planned developments deliver at least a 10% uplift on biodiversity levels.

### **CELEBRATING CEN CAMPAIGN WINS**

Legal protections for hedgerows from inappropriate cutting during bird nesting season were renewed; and agricultural property relief on inheritance tax was extended to farmland that has entered into a government-backed nature recovery scheme, removing a financial barrier to farmers entering new schemes.



**Help threatened British wildlife and habitats recover by controlling invasive species, working closely with farmers to support the careful reintroduction of certain native species, and taking a tougher stance on wildlife crime.**

- **License reintroductions of certain native species, like pine martens and beavers:** restoring native wildlife to our landscapes helps us not only recover essential parts of our natural inheritance but also provides a cost-effective way to tackle environmental threats like invasive species and climate change. Reintroductions of pine marten could play a major role in controlling invasive and destructive grey squirrel populations, while licensing wild beaver releases would mitigate flooding and drought. Reintroductions should be given funding from a renewal of the Species Recovery Fund. The risk assessment process should not be too bureaucratic, while post-Brexit red tape impeding animal transfers from the EU, which adds significant extra cost and complexity to reintroduction projects, should be simplified. In return for this support and streamlining of the paperwork, projects should be required to put in place management plans to mitigate any negative impacts of reintroductions. Farmers should also be rewarded through the new Sustainable Farming Incentive (SFI) for creating habitat for these reintroduced species on their land.
- **Reward farmers for tackling invasive species:** invasive species cost the UK economy £2 billion per year and are one of the leading threats to our native wildlife.<sup>68</sup> Farmers should be incentivised through ELMs to control them on their land. Tackling invasive species will be essential for halting the decline in nature this decade. Grey squirrel contraception schemes can enable the red squirrel to bounce back. Removing *rhododendron*

*poncticum* will enable natural regeneration of our woodlands and temperate rainforests. Setting mink traps in relevant areas of the country will support recovery of the water vole population. And controlling wild deer populations is essential for afforestation.

- **Fund wild venison processing facilities:** the deer population in the UK is at its highest level in 1000 years, with numbers thought to exceed 2 million.<sup>69</sup> Deer grazing is a big threat to woodland creation and to farmers' crops. Supporting the wild venison industry through grants to establish venison processing facilities could encourage more deer management and thereby reduce deer numbers. A lower deer population would enable woodlands to become established more easily, and to naturally regenerate. Wild venison could also make a contribution to efforts to boost domestic food production. Caterers in the public sector should be encouraged through new guidance in the Government Buying Standard for Food to use more venison, which is a low-cost, nutritious form of protein.
- **Improve data collection on wildlife crime and issue sentencing guidelines:** wildlife crimes such as hare coursing or raptor persecution blight our rural communities, causing significant harm to native wildlife and damaging important rural industries such as farming and tourism. The government should make wildlife crime a notifiable offence, so that the data is collected centrally by the Home Office.<sup>70</sup> Better data will enable police forces to more readily track repeat offenders and improve prosecution rates. Similarly, the lack of sentencing guidelines for wildlife crimes, which often leads to more lenient sentences being handed out, should be addressed.

**Position the City of London as the world leader in a new asset class of natural capital, helping to grow private sector investment into restoring the natural world and relieving pressure on the public finances to achieve our biodiversity goals.**

- **Establish a market framework for nature credits:** in the last parliament, the government published a draft market framework for trading privately funded nature credits, with the aim of leveraging an additional £1 billion of private money into the natural environment.<sup>71</sup> These proposals should be implemented as soon as possible, with standards for nature credits from a range of habitat types and rules for the stacking of credits confirmed. The proposal could be further strengthened by designating private sector bodies to accredit projects and award compliance credits, thereby speeding up the process and reducing regulatory uncertainty, and to regulate the nascent market.<sup>72</sup> Seagrass, saltmarsh, and kelp carbon codes should be created to boost investment in blue carbon, providing a new funding source for coastal communities around the UK.
- **Extend agricultural property relief to land where nature is being restored through private markets for nature:** the last government deserves significant credit for extending agricultural property relief to farmland in ELMs.<sup>73</sup> This removed a financial disincentive for farmers to enter into ELMs for fear of losing their inheritance tax breaks and increasing their tax liability. In this parliament, the relief should be maintained and extended to include farmland which is covered by a privately funded nature credits. This would remove an incentive for landowners to favour public over private schemes and remove another

financial barrier to farmers thinking about restoring nature on agricultural land via a private market.

- **Unlock more private sector funding for nature:** even with a framework in place for accrediting and trading nature credits, and even with the launch of biodiversity net gain, we need to expand the number of potential buyers of nature credits and therefore the amount of private funding for nature, if we are to reverse nature's decline. Demand for credits could be stimulated, for instance, by mandating the task force on nature-related financial disclosure's reporting guidelines and nature strategies for listed companies, to encourage companies to monitor and address any harms to biodiversity in their operations. Another potential demand driver could be expanding the environmental net gain principle for planned developments and major infrastructure projects to include other types of natural capital besides biodiversity, in line with the advice of the Natural Capital Committee.<sup>74</sup> Finally, plans to expand biodiversity net gain to the marine environment should be confirmed, to mitigate impacts of fossil fuel and offshore wind projects on marine habitats.<sup>75</sup>

**Complete the green Brexit reforms to environmental protections, taking advantage of our regulatory freedoms to tailor environmental rules to our own national context, accelerating environmental improvements inside protected sites, and simplifying processes for businesses.**

- **Reform designations for protected biodiversity sites:** we have a lot of different nature designations, some of which derive from EU law. Outcomes for nature inside protected areas are poor, with only 38% of SSSIs in a favourable condition in 2023.<sup>76</sup> A considered reform of the legislation is needed to clarify the

purpose of the designations, improve outcomes inside them, ensure we hit our international commitment to protect 30% of land for nature by 2030, and enable us to protect unique UK habitats and species properly like chalk streams. By improving certainty and speed for businesses and enabling strategic compensation of environmental harms, more private funding can be directed at nature outcomes rather than consultancy and legal fees. All protected sites should have strategies in place to restore their biodiversity, improve the habitat condition, and mitigate any negative impacts from development. Designation reform should be closely linked to the completion of farm payment reforms, so that farmers inside designated areas are rewarded fairly for their work restoring nature and guarding these unique and rare habitats. This is particularly important for upland farmers in designated landscapes, whose Higher Level Stewardship agreements are expiring and who need the higher tier Countryside Stewardship scheme to be developed rapidly, if this land is to deliver better outcomes for nature.

- **Continue the sensitive expansion of the network of highly protected marine areas in England:** UK seas contain some of the richest and most diverse sea life in the world, including over 8,000 species of fish and invertebrates. To protect the most precious elements of our marine biodiversity from extractive activities and allow unique marine habitats to recover, the rollout of the highly protected marine area network should be continued, as recommended by CEN peer Lord Benyon in a government review.<sup>77</sup> A further five sites should be designated in this parliament, building on the three already designated and following careful consultation with local communities.

- **Reform farm regulations and enforcement:** with the delinking and phasing out of legacy direct payments from the land ending the EU-derived regulatory system of cross-compliance, a new approach to farming regulation is needed to ensure a level playing field for farmers across the countryside. The new framework should balance maintaining strong overall protections for the natural environment, with a reduction in rules-based prescription, a preference for advice and incentives, and fines and other penalties being a last resort. We should trust farmers and help them do the right thing, but have a clear regulatory backstop so that farmers who do the right thing are not undermined and undercut by those who lower their cost of production through illegal activity. Breaches in regulation should be tackled for the benefit of the law-abiding majority of farmers, as well as rural communities. This is especially important for addressing the public's concern about poor water quality, where agricultural runoff contributes more to the problem than sewage.<sup>78</sup> The government should respond to Dame Glenys Stacey's review in 2018 into the future farming regulation and inspection regime.<sup>79</sup>
- **Cut red tape for marine restoration projects:** kelp, seagrass, and oyster bed restoration projects have significant benefits for water quality, biodiversity, and carbon sequestration. Yet perversely, they face the same lengthy and costly permitting process as some environmentally-harmful extractive practices in our seas. The licensing process involving the Crown Estate and Marine Management Organisation should be streamlined, with projects able to apply for a licence prior to receiving a Crown Estate lease. There should be a one-stop-shop regulator for projects to save them having to engage and provide information to multiple different government bodies.

- **Stop large fishing vessels from damaging our marine environment and wildlife:** free from the EU's Common Fisheries Policy, we have the power to prevent damaging fishing activity from taking place in offshore marine protected areas (MPAs). This power has already been deployed in a number of MPAs around England, but harmful practices, like bottom trawling, are still allowed to take place in most. However, just 6% of this suspected bottom trawling activity is carried out by UK vessels, whilst over a quarter of this damaging activity is suspected to be done by EU vessels.<sup>80</sup> This is often harmful to the commercial interests of smaller-scale British inshore fishers. The EU legal challenges over the existing bottom trawling restrictions and the closure of the sandeel fisheries should be faced down. Further to that, the ban on mostly EU-registered bottom trawlers operating in all protected waters should be completed, and vessels of all sizes restricted from fishing forage species that local wildlife depend on.<sup>81</sup> This will also have significant benefits for climate action, with evidence showing global emissions from bottom trawling contribute roughly the same emissions as the aviation sector.<sup>82</sup>
- **Secure a sustainable supply of fish for our coastal economies:** MPAs create space for depleted fish stocks to recover, meaning a greater volume and diversity of fish spill over into the neighbouring, unprotected areas to then be fished. The government should use its post-Brexit freedoms to support UK vessels to end the use of bottom-towed gear inside MPAs altogether, as well as setting sustainable quotas in line with current scientific recommendations. This will ensure our coastal communities have a sustainable supply of fish to catch, now and in the future.

5


Making the UK safer  
through improving  
resource security





**D**uring the last parliament, the Covid-19 pandemic and Russian invasion of Ukraine underscored the fragility of global supply chains and the importance of enhancing our energy and food security in particular. The transitions to clean homegrown energy production and to more regenerative, lower-input ways of farming, both of which will reduce our reliance on international gas markets that are under the control of autocrats, have become a national security issue, as well as an ecological imperative. Increased resource security does not simply entail increased domestic production at all costs, however: it requires diversity and sustainability of supply, including from imports, and bearing down on waste. In this parliament, as well as accelerating reforms to expand clean power, encourage sustainable farming, and tackle wasteful resource use, it will be important to tackle proactively new resource security risks as a result of the net zero transition, such as timber and critical minerals.

### HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD



The Agriculture Act enabled the rollout of the Environmental Land Management schemes (ELMs), which will restore the foundations of food production and help tackle the biggest medium- to long-term threats to food security (i.e. climate change and biodiversity loss); the last government's waste reforms, including the deposit return scheme, simpler recycling standards, and extended producer responsibility, will tackle littering, boost recycling rates, and increase resource efficiency.

### CELEBRATING CEN CAMPAIGN WINS

In the British Energy Security Strategy of 2022, the target for floating offshore wind was increased to 5 gigawatts by 2030, helping the UK stay ahead in the global race for investment in this new technology and harness higher wind speeds in deeper waters

## Expand UK forest cover, to improve timber security, sequester more carbon, and provide a sustainable waste feedstock to help industries such as construction to decarbonise.

- **Boost incentives for trees, forests, and woodland:** despite recent improvements in planting rates, we are still lagging behind our target to increase tree cover to 16.5% of England's land area.<sup>83</sup> Farmers should be supported to integrate more trees into the farmed landscape by proceeding with creating attractive options under both the Sustainable Farming Incentive and Countryside Stewardship schemes for agroforestry and riparian tree planting. The Nature for Climate Fund should be extended at the next spending review, to encourage larger-scale afforestation on appropriate land. And more private investment in forestry should be unlocked through the introduction of Forestry Creation Zones, with lower regulatory requirements, and clarified guidance on the stacking of multiple private credits for nature, carbon, and nutrients.
- **Restrict future biomass subsidies:** with mounting cost and sustainability concerns, no new large-scale subsidies for bioenergy with carbon capture and storage (BECCS) should be awarded in this parliament. Similarly if subsidies for unabated biomass plants are extended for energy security purposes, they should be strictly time-limited and subject to full financial transparency to ensure taxpayers are not funding excessive profits. As most of the pellets would have to come from overseas, doubling down on biomass power would make us more import-dependent with regards to our energy supply. From a timber security perspective, it would also be an inefficient use of our limited waste timber, which other sectors can use while keeping

the carbon locked up in the material. One estimate suggests a BECCS subsidy contract for one large-scale plant would cost energy bill payers £1.7 billion a year.<sup>84</sup> Limited sustainable biomass should instead be encouraged to supply our harder-to-decarbonise industries, such as construction, to help them reach net zero.

### Increase the diversity and capacity of the UK energy generation mix, helping to ensure security of supply and keep the lights on, harnessing more of our clean renewable natural resources to power Britain, and reducing our dependence on imported gas.

- **Maximise the potential of solar on rooftops and reservoirs:** solar power provides a highly cost-effective way to cut emissions and boost energy security. While ground-mounted solar on less productive farmland will play a critical role in meeting our energy needs, more could be done to maximise the potential of solar on rooftops and reservoirs where land use conflicts are lower. Firstly, floating solar schemes should be allowed to bid into CfD auctions. Existing permitted development rights for floating solar should be extended so developers can sell the power to businesses other than water companies. Floating solar could make a significant contribution to our energy security, with the potential to deploy up to 16 gigawatts of floating solar on English and Welsh water company reservoirs alone.<sup>85</sup> The UK has relatively low levels of domestic rooftop solar, with just 6% of homes having panels compared to 25% in the Netherlands.<sup>86</sup> To boost solar coverage, building standards should be strengthened to require solar panels on new homes and commercial buildings. The extra cost of adding panels to a new house is paid back in

under a decade through energy bill savings.<sup>87</sup> The minimum tariff under the Smart Export Guarantee should also be reviewed for rooftop solar, which pays households and businesses for any excess solar power they export to the grid. Increasing the minimum tariff would boost the financial attractiveness of rooftop solar.

- **Unleash the potential of geothermal energy:** deep geothermal energy could provide a significant source of low-carbon heat for the UK, would disproportionately benefit our more economically deprived industrial heartlands and former coal mining areas, and could fall in cost if economies of scale from reusing drill rigs can be unlocked. Detailed surveying of areas that are suitable for deep geothermal is a critical first step for developing this industry, alongside the inclusion of deep geothermal in local heat network zoning. The industry also needs pump-priming with some funding in order to scale, potentially through a ring-fenced pot for deep geothermal heat within the CfD mechanism, in a similar way to tidal.<sup>88</sup>
- **Build a fleet of small modular nuclear reactors (SMR):** SMRs have the potential to diversify the UK energy mix and provide consistent zero-carbon power, therefore contributing to net zero and energy security goals. However, while there has been good recent progress on setting out the process for designating nuclear sites, the timetable for the SMR competition has already slipped. The outcome should be announced and CfD negotiations concluded with the first project developers as soon as possible, to maximise the chances of SMRs being online by the mid-2030s.
- **Build more long duration energy storage:** the UK has not built any long duration energy storage for 40 years, since the last

pumped hydro projects were commissioned in the 1980s. Since then, the need for long duration energy storage has increased significantly with the expansion of variable renewables. Rolling out innovative and established long duration storage technologies will be critical to maintain security of supply in a renewables-dominated grid, without having to rely on back-up gas plants, and enable surplus renewable power during windy or sunny periods to be stored rather than wasted. Proposed reforms to the capacity market to procure more low-carbon flexibility, such as long duration energy storage, in a market-friendly way should be delivered. It has been estimated that deploying up to 20 gigawatts of long duration energy storage by 2050 would deliver savings of up to £24 billion.<sup>89</sup>

- **Prioritise limited clean hydrogen supply for the sectors where it is essential for decarbonisation:** clean hydrogen will be essential to cut emissions in sectors such as aviation, shipping, and certain industrial processes, but there are more efficient ways to decarbonise home heating and buses than hydrogen. Heating homes through hydrogen boilers is estimated to be at least 20% more expensive than heat pumps, and significantly less energy efficient.<sup>90</sup> Given the limited supply of clean hydrogen, the focus should be on attracting hydrogen investment into the chemicals sector, hydrogen planes, hydrogen ferries, and hydrogen power stations, over hydrogen buses and hydrogen heating.<sup>91</sup>

**Strengthen the UK's food security by investing in the foundations of domestic food production, ensuring farmers get a fair return from the market for sustainable food, and enabling innovation in technologies.**

- **Maintain the nature-friendly farming budget in real terms:** to strengthen our food security and tackle environmental threats like biodiversity loss, farmers need flexible and generous support to help them adopt more sustainable and resilient farming practices. The transition from the wasteful, inefficient, and environmentally harmful EU Common Agricultural Policy is already underway and offers substantial benefits for farmers, taxpayers, food security, and the natural environment. The new schemes have been improved and take-up has grown, with over 10,000 farmers applying for the Sustainable Farming Incentive this year.<sup>92</sup> But the budget was frozen in cash terms during the last parliament, meaning high levels of inflation have eroded its value. The budget should be protected throughout this parliament in real terms, with funding to safeguard and restore the foundations of food production, such as healthy soils and pollinators, that also deliver environmental benefits.<sup>93</sup> In addition, a broader range of options for livestock farmers should be offered, including standards for hay meadows, mob grazing, and methane-suppressing feed additives. Greater focus should be put on blending public nature-friendly farming incentives with private markets for nature, to maximise incomes for farmers and value for taxpayers' money, and to avoid crowding out private sources of funding.
- **Tackle unfairnesses in the food supply chain:** research has found that average profits for farmers, across a range of staple fresh foods, are paltry, often less than 1% of the profits in the food supply chain.<sup>94</sup> Several supply chain reviews were carried out in the last parliament. Similar reviews should be conducted for the remaining farming sectors, using more of the powers within the Agriculture Act to publish food supply chain data, particularly in relation to wholesale price transparency, helping

to improve fairness in contracts between farmers, growers, food processors, and retailers. This will boost the negotiating power and profitability of farmers in the agri-food chain, helping farmers to get a fairer price for their produce, exposing any unfairnesses in the supply chain, and reducing demands for public money to support non-environmental outcomes.

- **Enable innovation in food technologies:** we should seize a key benefit of Brexit by reforming regulations to enable the private sector to deploy cutting-edge technologies to produce more sustainable homegrown food. With expanding global protein demand and climate change affecting yields around the world, these technologies should not be regarded as a threat to farming, but a complement that can strengthen food security. This should include implementing the Genetic Technology (Precision Breeding) Act 2023 to enable farmers to use gene edited crop varieties which can boost yields while reducing reliance on environmentally harmful inputs. The government should also implement the Food Standards Agency's proposed reforms of novel foods regulations to enable alternative proteins to receive regulatory approval faster. There is an opportunity to steal a march on the EU with their more cumbersome regulatory process by pursuing bolder liberalisation, including using risk assessment opinions shared by other trusted regulators.<sup>95</sup> At the same time, the government should continue supporting the industry's development with R&D funding for scientists and start-ups, liberalise rules to enable public, pre-market tastings, remove the requirement for separate approvals by ministers in all devolved administrations, and allow the FSA to utilise full cost recovery to expand its capacity and enable faster decisions for new foods.

**Lead the world in responsible resource management and consumption, by pushing waste policy beyond recycling to encourage more reuse of materials, strengthening resource efficiency and security, and lessening the impact on the environment from resource extraction.**

- **Monitor and reduce embodied carbon in new buildings:** major improvements were made during the last parliament to regulations to reduce emissions from new buildings once they become operational. Next year's Future Homes Standard will decarbonise construction further still. However, as carbon embodied in a building from its construction phase accounts for almost half of life-cycle carbon emissions from homes built to higher energy efficiency standards, new requirements to monitor and ultimately reduce embodied carbon in new builds should be gradually phased in.<sup>96</sup> Embodied carbon standards should apply to new homes only and should not be used to block planning approval for the demolition and replacement of buildings where that offers overall benefits for the environment.<sup>97</sup>
- **Deliver and strengthen EPR schemes:** EPR requires businesses to fund the costs of managing their waste and incentivises them to minimise waste in their product design, but is currently only applied to packaging. It is a conservative approach as it shifts the costs away from taxpayers and onto polluters. It has potential to improve resource efficiency in a range of sectors and so should at least be extended to textiles. Reuse should be incentivised explicitly in a scheme's design, through the setting of reuse targets, embedding ecodesign, and favourable inclusion within any modulated fee structure. To aid the transition towards reusable goods, some of the funds from manufacturers should be



redirected to repair vouchers for consumers. EPR can stimulate job creation and investment in the reuse and repair economy.

- **Fund a ‘circular city’ trial:** many small-scale and standalone reuse trials have taken place in different parts of the country to put circular economic principles into practice, but they have been limited by their size and scope. A city-wide trial would provide a focus for government-funded research projects and policy development, as well as businesses and not-for-profits looking to test their ideas. These activities would also be ripe for academic research, including the work of the new centre for circular economy research.<sup>98</sup> The location could be established as a competition between metro mayors, with the government offering a small amount of funding to help cover some of the costs and incentives to entice businesses to engage with the trial.
- **Extend the right to repair for electrical and electronic goods:** the UK is currently the world’s second top producer of electrical waste per person.<sup>99</sup> Too many electrical products are designed not to last, with repair options made challenging by a lack of spare parts, instructions, and tools. Circular economy regulation requiring firms to offer consumers a ‘right to repair’ should be extended to more electronic goods, to ensure they can be repaired by commonly available tools and guarantee access to spare parts and repair documentation.
- **Sign new critical minerals partnerships:** critical minerals are essential for many clean technologies, yet mining and processing is concentrated overseas. We should seek to strengthen our security of supply by co-financing new mining and refining facilities, cooperating on signing suppliers-of-last-resort agreements, and reducing trade barriers for critical minerals, including tariffs. At the same time, we should use our roles in

international fora to strengthen environmental, social, and governance standards for critical mineral mining and processing, to tackle unethical practices across the current supply chain. We should also seek to reduce our reliance on virgin critical minerals where possible, by encouraging more circular approaches in government policies to promote clean technologies.<sup>100</sup>

- **Require food waste reporting by large food companies:** in the UK, an area approximately the size of Wales is used to grow food and drink that goes on to be wasted.<sup>101</sup> This is a moral, environmental, and economic outrage. Requiring food waste reporting by large food companies would incentivise supermarkets and other large firms to measure the problem and provide the impetus to reduce it. It could also enable innovative schemes where surplus food can be given to food redistribution charities rather than left to go to waste.

# 6

Increasing the UK's  
influence and standing  
in the world through  
environmental leadership



**T**he UK has built up a strong reputation on the world stage in recent years for environmental leadership - whether through our presidency of the COP26 climate conference in Glasgow or through our pivotal role in securing new global treaties on biodiversity and protection of the high seas. This reputation is a significant source of soft power for the UK and a way to build alliances with countries that experience grave environmental impacts and those which share our environmental aims. While we feel the impacts of environmental threats like climate change here, solving them requires sovereign nations to work together, whether through free trade, development finance, or diplomacy. International environmental action is about advancing our national interests, not grandstanding at global conferences, as some claim. In this parliament, maintaining and enhancing our standing on the world stage as leaders in tackling climate change and biodiversity loss should be a priority.



### **HIGHLIGHTING THE POSITIVE CONSERVATIVE RECORD**

During the UK's presidency of COP26, the share of global GDP covered by national net zero targets rose from 30% to more than 90% and ambitious side deals to halt deforestation by 2030, phase out unabated coal power, and align financial flows with net zero were agreed.

## CELEBRATING CEN CAMPAIGN WINS

Nature-related international development spending has been significantly increased, with the last government committing to spend £3 billion of the International Climate Finance budget on projects that protect and restore nature; a Blue Belt of marine reserves has been established and grown around the UK Overseas Territories, protecting 4.3 million square kilometres of marine environment; and a new due diligence obligation was created by the Environment Act for large companies trading forest-risk commodities to tackle illegal deforestation in their supply chains

**Recommit to leading the world on marine conservation and restoration, by continuing to enable the expansion of our Blue Belt programme of marine reserves around UK Overseas Territories (UKOTs) and by being in the vanguard of global efforts to safeguard biodiversity in the high seas.**

- **Work with the UKOTs to designate more marine protected areas in their waters:** to protect some of the most important biodiversity and marine habitats in British waters from harmful activities, the Blue Belt was established in 2014 and has grown significantly under successive Conservative governments, working closely with UKOT governments. It is now the world's largest network of marine conservation areas and an environmental achievement the UK should feel great pride in. In this parliament, ministers should look to build on this success by potentially extending the Blue Belt of marine protected areas (MPAs) to more UKOTs in the Caribbean, as well as continuing to manage and enforce the current MPA network of 4.3 million square kilometres across 10 UKOTs, equivalent in size to the total area of India, France, and Spain combined. Funding for

the programme should be guaranteed and increased modestly during this parliament in line with inflation, given the incredibly good value for money of the scheme and the expansion in the total area under protection. To date, the scheme has cost approximately £1.86 per year for every square kilometre protected. Private finance should also be crowded in to support the restoration of marine habitats inside the Blue Belt, through including ‘blue carbon’ credits generated in the UKOTs in UK carbon markets.<sup>102</sup>

- **Ratify the High Seas Treaty in UK law:** the UK played a leading role in securing this deal to protect the high seas from overfishing and establish marine protected areas in waters that are beyond national jurisdictions. The government should prioritise legislation to ratify the agreement in UK law in advance of the UN Ocean Conference in June 2025, so that the treaty can come into force as soon as possible. Once the treaty is ratified, the UK should work with partners, including the governments of the UKOTs, to commence the formal consultation process for designating the first high seas MPAs adjacent to their waters.
- **Champion a global moratorium on deep sea mining:** the last government backed a moratorium on deep sea mining in October 2023, becoming one of 25 states to support protecting these pristine habitats from harmful mineral extraction. The deep sea holds an incalculable array of natural riches which have taken millenia to form. Less than 0.01% of the deep seafloor has been studied in detail.<sup>103</sup> Disturbing the sea bed through mining risks damaging unique habitats, undiscovered species, and the many benefits coastal communities derive from healthy oceans. While demand for critical minerals is expected to increase significantly due to the energy transition,

we should be prioritising extraction from terrestrial mines and using our existing mineral resources more efficiently, by reusing and recycling them, before we interfere with these precious ecosystems. The UK should urge other countries to back a global moratorium.

**Dismantle trade barriers for green goods and services, to improve our resource security and cut the cost of the green transition for the UK and the rest of the world, while creating a level playing field on environmental standards for imports and domestic goods to enable efficient competition.**

- **‘Ally-shore’ supply chains for clean technologies:** China is currently home to 90% of global solar manufacturing and 70% of battery manufacturing.<sup>104</sup> This is not a reason to shun clean technologies that are cheaper and vital for climate action, but increases the imperative of developing alternative supply chains that are secure and do not deepen dependence on China. Therefore, alongside supporting increased domestic manufacturing capacity for clean technologies, we should prioritise the signing of new free trade agreements with friendly countries, such as Chile and Canada, that are important for the net zero transition, due to critical mineral reserves or a concentration of supply chain companies for important clean technologies.
- **Cut tariffs on green goods:** we should expand the ‘green list’ of zero-rated, zero-carbon goods and services, including bicycles. In addition, we should also sign bespoke, small-scale free trade agreements (FTAs) to eliminate tariffs on sustainable products from key countries, building on the targeted FTA negotiated

with the Maldives to lower barriers to sustainable tuna imports. Targets for new FTAs could include the Congo or Gabon on timber, given their work to tackle deforestation from logging, and agricultural commodities from Costa Rica. This will expand free trade and make it cheaper for people to buy green products in the UK, while encouraging other countries to adopt greener practices to gain more favourable access to our market and creating an economic incentive for countries not to renege on environmental policies.

- **Strengthen supply chain due diligence requirements:** large firms now have to audit overseas supply chains for illegal deforestation and eliminate harm. The secondary legislation to implement this should be passed as soon as possible for all forest-risk commodities, such as soya and beef. In this parliament, this policy should be pushed further; for instance, due diligence requirements for forest-risk commodities should be extended to the investments of financial services companies and the due diligence approach should be applied to other forms of environmental harm, such as illegal, unreported, and unregulated fishing.
- **Encourage the development of high-integrity international carbon markets:** the UK's climate strategy should prioritise reducing our own emissions responsibly, supporting innovation in clean technologies, and developing clean industries that we have comparative advantage in. But for the hardest and most expensive-to-abate emissions, the UK should explore sourcing credits from countries with competitive advantages over the UK in greenhouse gas removal technologies, like direct air capture. This could be cheaper than generating domestic greenhouse gas removals



in bulk, given our relatively high industrial electricity prices. Appropriate safeguards to ensure the environmental integrity of international credits should be put in place.

- **Implement a Carbon Border Adjustment Mechanism (CBAM):** this will prevent high-carbon imports undercutting domestic products and create a level playing field for British industry with international competitors. Under the CBAM, a charge on high-carbon imports would be levied on a limited number of trade-exposed commodities, such as steel and fertiliser, to provide a level playing field on carbon pricing with domestic industries in order to avoid concerns about protectionism. This is essential to avoid the offshoring of industry, while pursuing a free market approach to climate policy through rising carbon pricing. This will save taxpayers' money on giving out free emissions permits to energy-intensive industries, while retaining the incentive for domestic industry to invest in clean, energy efficient technologies. Revenues from the CBAM should be ring-fenced to lower energy costs, for instance by funding the costs of removing some green levies from electricity bills, and to give a carbon pricing rebate to our exporters so they can compete on a level playing field with international competitors. The time gap between the UK scheme and the EU scheme's introduction should be kept to a minimum, and over time, once the mechanism has been proven, it should be applied to more trade-exposed commodities.

**Increase our support for developing countries and UK Overseas Territories to help them address climate change and biodiversity loss in a way that furthers the UK's core economic and security interests and maximises opportunities to leverage private finance.**

- **Meet our international climate finance responsibilities:** over the last five years, the government has allocated £11.6 billion of the overseas aid budget to help developing countries to cut emissions, adapt to climate change, and develop sustainably. In the new budget period from 2025, this should at the very least be increased in line with global targets set at the next UN climate summit. The government should also commit to an even split between adaptation and mitigation finance, building on the existing commitment to increase adaptation finance from £500 million in 2019 to £1.5 billion in 2025. Indeed, given the UK is responsible for a small share of global emissions, mitigation finance is essential for ensuring developing countries reduce their emissions too and for limiting the impact of extreme weather events in the UK, while adaptation finance will help tackle one of the main drivers of instability, conflict, and migration overseas. Similarly, a greater emphasis should be put on smaller, bilateral climate finance projects rather than multilateral donations, given the benefits for UK soft power and their greater value for money.
- **Work with international allies to close the finance gap for protecting nature:** we should strengthen our global leadership on nature by supporting the delivery of the G7 leaders' commitment to make all aid spending nature-positive and aligned with the Kunming-Montreal Global Biodiversity Framework (GBF). The UK should bid to host the Convention on Biological Diversity COP17 talks in 2026. We should use the conference to push other nations to match the UK's allocation of 25% of its climate finance budget for nature-based solutions, as we will not halt the global temperature rise without protecting and restoring carbon-rich natural habitats like forests. The UK should also replenish the successful Blue Planet Fund from our

overseas development budget, which has been a key driver of international marine protection, for example with the Eastern Tropical Pacific Marine Corridor (CMAR) initiative in the Pacific.

- **Leverage more private finance in international climate finance programmes:** taxpayer support for developing countries to tackle climate change and biodiversity loss should aim to leverage more private finance. For instance, greater use should be made of government-backed guarantees to derisk projects for private capital, and of the British International Investment as a credit enhancement vehicle, offering loans or equity investments.
- **Unlock more climate finance from multilateral development banks (MDBs):** the UK should use its voting rights to champion the ‘Bridgetown Initiative’, a plan to reform MDBs to unlock more finance for developing countries to address climate change. The plan includes several elements that would not require additional aid spending, such as a call to leverage the balance sheets of the World Bank and other MDBs to unlock an additional \$1 trillion for climate finance, and to use ‘special drawing rights’ to support climate action in developing countries. This will help more developing countries take action on climate change and boost the UK’s standing with Commonwealth nations.
- **Replenish Darwin Plus scheme funding for nature recovery in the UKOTs:** the natural environments of the British Overseas Territories are of outstanding global value, with vast coral atolls, extensive carbon-rich peatlands, millions of penguins, and recovering great whale populations. The Darwin Plus grant scheme is open to UKOT governments and NGOs, and is the primary funder of nature restoration in these unique UK habitats. The scheme only has a modest cost to the exchequer

of £10 million per year and delivers excellent value for money, but is due to expire in 2025, leaving some projects facing a cliff-edge in funding. Adjusted for inflation, Darwin Plus should be extended for at least the lifetime of this parliament, continuing a globally important British conservative environmentalist success story.

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