

Bright Blue Conservation Manifesto

The UK's 25-year Environment Plan provides a strong framework for the direction the UK must take on biodiversity, particularly overseas, stating that it will establish "appropriate mechanisms to screen policies and strategies for potential negative environmental effects overseas". Accordingly, BEIS and other departments must value nature and conservation when devising policy – not only overseas, but at home too. Indeed, rather than mainstreaming biodiversity into policy, many departments at best tag on biodiversity as an afterthought rather than a core consideration in their decision making. This results in ineffectual policies where biodiversity is often placed at odds with more traditional departmental priorities. To effectively screen for such conflicts and ensure that biodiversity is prioritized, the UK must create a new decision-making mechanism that adds more weight to nature and a toolkit to guide policymakers on their international and national legal obligations. These additional screens would help correct institutional bias and help civil servants to make optimal decisions when it comes to biodiversity and conservation. Indeed, had nature been given the weight it deserves, technologies such as offshore and onshore wind and solar would merit greater support in our efforts to phase out coal, rather than coal-to-biomass conversions, as each are technologies that are truly carbon free, and can have much less impact on nature.

Overseas ecological degradation is driven primarily by international environmental nimbyism – whereby a country objects to environmental harms being located within its borders but supports or funds it overseas. Providing subsidies to burn woody biomass to generate electricity is a clear example of this.

There is ample evidence that UK wood pellet imports (the largest in the world) drive destructive forestry practices and threaten forests and the species that depend on them.¹ The US Southeast is ground-zero for wood pellet manufacturing, the majority of which are exported to the UK to be used as fuel in inefficient, electricity-only power stations. This energy play, based on imported wood, is subsidized by the UK taxpayer by as much as 800 million pounds annually. This region is also home to biologically rich wetland forests known as bottomland hardwood forests. In 2016, the U.S. Southeastern coastal plain, which encompasses the sourcing area for most wood pellets facilities in the region, was recognized as a global biodiversity hotspot because it provides habitat for more than 1,500 endemic vascular plants and has experienced greater than 70% habitat loss.² What is acute about this example is it is in one of the most advanced countries in the world where we assume harm is not occurring. The damage to the SE US as a result of UK policy is happening therefore without due knowledge or oversight. This example highlights that whilst political and policy pressure may on occasion be applied to harm done in developing countries, it is rarely done in more developed countries where the assumption is that no harm is permitted.

Biomass subsidies are therefore undermining the UK's broader commitment to environmental conservation, and its international commitments under the Convention on Biological Diversity and the Aichi Targets to reduce or phase out subsidies harmful to biodiversity. Restricting bioenergy use will benefit biodiversity by decreasing pressure to destroy important habitats for the energy sector.

If the UK's 25-year Environment Plan and its commitment to the Paris climate goals to keep climate change to within 1.5 degrees is to succeed, it will need to ensure that nature is a core consideration in every policy, regardless of department and geographic location, lest we have the perverse

¹ Southern Environmental Law Center, *Burning Trees for Power: The Truth About Woody Biomass, Energy & Wildlife* (Jan. 2018), https://www.southernenvironment.org/uploads/publications/Biomass_Biodiversity_white_paper.pdf.

² <https://www.cepf.net/stories/announcing-worlds-36th-biodiversity-hotspot-north-american-coastal-plain>

situation of protecting nature within our borders, while sacrificing it elsewhere. A revised decision-making mechanism that fully accounts for nature would provide greater scrutiny and consider the impact of the full cycle of the policy before supporting it, as well as test old assumptions that an evolving energy system demands. Such a mechanism should be fully incorporated into the Treasury's Green Book (which provides guidance on how to appraise and evaluate policies, projects and programmes).

Whilst it is inevitable that screening the impact of policies and decisions becomes harder the further away from home we get, at present, nature in particular, rarely figures as highly as other factors.

- **We recommend that a new decision-making mechanism be established and fully incorporated into the Treasury's Green Book which allows nature and the climate to be given greater weight in policy making.**
- **We recommend factoring in the offshoring of carbon emissions and biodiversity loss when determining UK policy, and incorporating it into a new decision-making mechanism.**
- **We recommend that a consistent set of criteria be applied across all States regardless of the level of development**

Effective conservation policy needs to fully consider the impact it has on atmospheric carbon levels, alongside other pollutants and climate change - Current decision making fails to adequately or accurately consider carbon and biodiversity impacts, and on occasions plays one against the other.

Some sources of bioenergy, such as woody biomass in the power sector, that are being used in the UK do not deliver genuine greenhouse gas emission savings relative to fossil fuels. The science is clear that when biomass from forests is burned for electricity, it immediately emits CO₂ to the atmosphere in amounts greater than burning fossil fuels,³ and it takes decades or even much longer to recapture those emissions and to make up for the lost sequestration when carbon forest stocks are reduced by biomass harvests. This increased carbon pulse to the atmosphere over the next few decades or more is contrary to the immediate reductions in emissions called for in the next decade by the UNFCCC to prevent the dire impacts of climate change.⁴ The UK Committee on Climate Change (CCC) has recently concluded that the UK must abandon burning wood for power production due to its adverse carbon emissions (unless the stack emissions can be captured and permanently stored).⁵

Numerous reports have confirmed that the UK is not accounting for the increased emissions from burning forest-derived feedstocks for power. The Chatham House report demonstrates that the UK is the country most reliant on burning wood among those countries that do not report the reduction in forest carbon stocks resulting from biomass harvesting—particularly from the U.S.⁶ Considering

³ Commentary by the European Academies' Science Advisory Council (EASAC) on Forest Bioenergy and Carbon Neutrality. (EASAC, 2018) "Carbon emissions per unit of electricity generated from forest biomass are higher than from coal and thus it is inevitable that the initial impact of replacing coal with forest biomass in power stations is to increase atmospheric carbon dioxide levels."
https://easac.eu/fileadmin/PDF_s/reports_statements/Carbon_Neutrality/EASAC_commentary_on_Carbon_Neutrality_15_June_2018.pdf

⁴ Biomass Supply and Carbon Accounting for Southeastern Forests <https://www.nwf.org/Educational-Resources/Reports/2012/02-14-2012-Southeast-Carbon-Study>

⁵ UK Committee on Climate Change, Biomass in a Low-Carbon Economy (Nov. 2018), <https://www.theccc.org.uk/wp-content/uploads/2018/11/Biomass-in-a-low-carbon-economy-CCC-2018.pdf>.

⁶ Duncan Brack, Chatham House, Woody Biomass for Power and Heat: Impacts on the Global Climate (Feb. 2017), <https://www.chathamhouse.org/sites/default/files/publications/research/2017-02-23-woody-biomass-global-climate-brack-final2.pdf>.

this, more stringent carbon accounting rules that truly reflect the net carbon effect of burning forest for energy including the reductions in carbon stocks in source countries are critical.

Most of the emission reduction pathways for meeting the Paris Agreement goals include high levels of bioenergy, and the UK Government's Clean Growth Strategy (CGS) envisages a 36% increase in the use of bioenergy by 2023, particularly for the heat, heavy industry, and transport sectors. Proper accounting rules are vital to prevent an expansion in the use of bioenergy that does not genuinely eliminate greenhouse gas emissions. These changes to carbon accounting rules should also inform what technologies the Government chooses to support financially.

- **We recommend - in line with Bright Blue's net zero report - a change in the carbon accounting rules to take account of all the lifecycle emissions of bioenergy. This should include emissions released during harvest, processing, transportation, and combustion of bioenergy, emissions from reduction in carbon stocks compared to a business as usual scenario, and emissions from indirect land use change where bioenergy use creates more demand for arable land that in turn drives deforestation.**

The United Kingdom should work with international partners to ensure international carbon accounting rules account honestly for any decrease in forest carbon storage. Current UK and international accounting is based on LULUCF accounting which spells out the contribution the EU's land and forests will make to fighting climate change. However, as noted above, it contains a fundamental flaw wherein a feedstock sourcing country like the U.S. is not accounting for reductions in forest carbon storage. The UK should work with international partners at the UNFCCC to fix this key flaw, whilst at the same time calling for more robust accounting in its bilateral relationships and future free trade agreements under any sustainability chapter.

The UK should also leverage other multilateral environment agreements such as the Convention on Biological Diversity to ensure that more robust forest conservation practices are incorporated into a country's National Biodiversity Strategies and Action Plans (NBSAPs) as mandated under the Aichi Targets. Such practices when supported with Overseas Development Aid would prevent offshoring of biodiversity loss and carbon emissions, whilst at the same time ensure sustainable development in line with the SDGs. It should be noted that supporting third countries in their development of NBSAPs and efforts to meet their Aichi Targets is not only a part of the Aichi Targets themselves but is also a requirement of UK legislation (as part of the EU Biodiversity Strategy). This policy commitment must be better leveraged and prioritised within the 25-year Environment Plan.

- **We recommend that the Government use its diplomatic reach to create an international coalition supportive of amending international carbon accounting rules to better account for the contribution forests make to reducing climate change.**
- **We recommend until stricter accounting rules are agreed at the UNFCCC, the UK negotiate for robust accounting rules to be incorporated into its future free trade deals, and where no agreement can be made, unilaterally use such rules to determine its import policy.**
- **We recommend the UK give greater support to countries in developing their NBSAPs and align that support with its ODA to ensure care for forest carbon sinks and truly sustainable forestry that does not harm biodiversity or the climate.**