

December 10<sup>th</sup> 2019

Dear Craig,

I am writing to you about Friends of the Earth's final assessment of manifesto commitments on the environment for the upcoming election on December 12.

The Green Party has always been, and will continue to be, the party of action and ambition on climate change and nature. We were therefore surprised and disheartened to see that our offer at this election had been scored below that of the Labour Party who, despite improving their climate and nature policy in recent years, are still failing to recognise the scale and urgency of transformation that the science demands in either their actions or policies.

The Green Party values the good work of Friends of the Earth and understands the constraints that organisations like yours are placed under during election periods. In these circumstances, it is critically important to provide your supporters with an accurate reflection of the choice in front of them at the ballot box. In our view, your final manifesto assessment falls short. In light of this, and in the spirit of being constructive allies in tackling the climate and ecological emergency, I would like to set out some example of why Greens, and many in the wider movement, feel that your analysis misrepresents the choices that voters must make on climate and nature at this election.

Much of what the Green Party has been marked down on is in fact established Green Party policy on which Green Party politicians and members have been campaigning for years, often alongside Friends of the Earth and others. Our policy is made democratically by members and cannot therefore just be amended or added to during an election campaign. It exists as an extensive core document underpinning all our work and guiding elected Greens at all times, and you will appreciate that it's not possible to include every single policy in an election manifesto. I want to highlight just some areas here, which bring into focus the breadth and depth of the Green Party's plans, and which we feel were missed by your analysis.

### **1 - Climate targets:**

When it comes to overall climate ambition, we note that [the youth climate strikers' primary demand](#) is a Green New Deal reaching net zero emissions by 2030. The Green Party has committed wholeheartedly to this. Friends of the Earth's analysis scores the Liberal Democrat net-zero by 2045 policy equally to the Green Party policy of 2030, despite the enormous gulf in climate justice between the two. Net-zero by 2030 is a policy based on an understanding of the UK's fair share of the remaining global carbon budget; 2045 will see us smash through our fair share and continue to pollute for decades, at grave human cost to many around the world. Labour's commitment to achieving "the substantial majority" of emissions reductions by 2030 is unjustifiably scored the same as the Green's firm 2030 commitment.

## **2 - Aviation:**

Air travel is an enormous challenge on the path to decarbonisation. By 2050, [it is calculated](#) that aviation emissions could consume between half and two thirds of the UK's total 1.5C compliant carbon budget. The Green Party manifesto clearly sets out several policies to "Commit to reduce greenhouse gas emissions from aviation to well below the level in the year 1997 as fast as possible".

The Green Party is the only party with a clear and longstanding position of absolutely no new airport expansion (manifesto page 17) in addition to other vital measures including a frequent flier levy (manifesto page 17), banning the advertising of flights (manifesto page 17) and ending the tax exemptions for aviation fuel, (manifesto page 17), as well as taking into account the effect of emissions at altitude.

We would also draw your attention to Green Party policy [TR502](#): *Air transport is not covered adequately by the Paris Agreement. Emissions from both national and international air travel shall be addressed by country's National Determined Contributions (NDCs).* And to Green Party policy [TR431](#): *However, current shipping practices cause unnecessary environmental impact and endanger ships, crew and passengers. The Green Party would strengthen regulations within English and Welsh waters and would work towards better regulations and improved enforcement for international shipping through the International Maritime Organisation (IMO).*

The Labour Party remains open to regional airport expansion. Last year, more Labour MPs voted for the third runway at Heathrow than voted against; despite the fact that this would double the size of what is already the single biggest piece of climate-wrecking infrastructure in the UK. As [you yourself have said](#), "how can we take any government remotely seriously when they claim to care about climate chaos while supporting this runway?" It is not enough for Labour to state that aviation expansion must meet climate and environmental tests, they must actively oppose it whether in power or opposition.

## **3 - Aviation and shipping emissions in carbon budgets:**

Rather than a broad brush approach of just "including international aviation and shipping into the UK's carbon targets" we have set a much higher bar on climate leadership with the measures we would deploy to reduce these emissions. Our manifesto (page 16) details how we would use a carbon tax to target the cost of aviation and shipping fuel. This goes significantly beyond the current application of a carbon tax on fossil fuels used in electricity production and is one of many clear indications of our intention to ensure aviation and shipping related emissions are reduced in line with what the science demands.

Green Party policy [TR502](#) states: *"Air transport is not covered adequately by the Paris Agreement. Emissions from both national and international air travel shall be addressed by country's National Determined Contributions (NDCs)".*

A glance at my parliamentary record, for example, shows that this is something I have been pushing for strongly in parliament in line with our clear party policy. For

example [here](#) I specifically call for aviation and shipping emissions to be included in the UK's carbon budgets.

#### **4 - Offsetting:**

This is something that Greens in Westminster and in the European Parliament have been outspoken on and is also backed up by Green Party policy [CO16](#) which states: *"A zero carbon society in the UK should be achieved through action in the UK and not through international carbon trading or offsets."* In our manifesto we are very clear that climate change emission reductions will be achieved by meeting most of our energy needs through the domestic production of renewable energy; reducing overall energy demand from buildings and homes; transforming UK industry, transport and land use. In other words, offsetting is not part of our plans. We also support the introduction of an EU-wide carbon tariff on countries that are not reducing their carbon emissions, to further encourage global action on the Climate Emergency, indicating that we would play an active role in reducing emissions outside of the UK – offsetting would be at odds with this.

I'd welcome a great deal more attention to the flaws of offsetting from NGOs, including domestically, for example where soil restoration or tree planting projects are being used to justify high carbon infrastructure development with far too little scrutiny or challenge.

#### **5 - Fossil fuel funding:**

I'm particularly disappointed that Friends of the Earth do not give the Green Party full marks for your ask to "End public financing of coal, oil and gas projects overseas - both directly and indirectly under UKEF and Official Development Assistance" because the manifesto covers this very clearly, stating on page 10: *"Remove subsidies to the oil and gas industries."* This fully covers direct and indirect fossil fuel financing. This would also be covered by the manifesto commitment on page 45 which states: *"Make the Climate Emergency and tackling poverty priorities for our international aid budget. We will phase out payments to richer nations and increase support for the poorest, to help countries deal with the causes and impacts of the Climate Emergency."* That very clearly rules out all coal, oil or gas financing too. Moreover, alongside other Greens, I've been a leading voice in campaigning to end the flow of UK public (and private) money into fossil fuel projects for many years, by pressing for amendments to legislation through to wider campaigning, notably efforts to divest the parliamentary pension scheme from fossil fuels.

#### **6 – Plastic pollution:**

We consider that it would have been fair to give the Green Party full marks for your ask to: "Introduce a Plastics Pollution Bill to eliminate the plastic pollution that is the scourge of rivers and oceans as well as streets, roadways and fields, with a particular focus on action to reduce plastic use and increase the re-usability of products." I've given wholehearted support to this legislation in parliament and the manifesto backs this up, with, for example on page 20: *"Ban the production of single-use plastics for use in packaging and invest in research and development into alternatives to plastic."*

*We will also extend the tax on plastic bags to cover plastic bottles, single-use plastics and microplastics, and extend plastic bottle deposit schemes.”*

This topic is also related to page 18 of the manifesto which sets out the overarching principle of our Green New Deal for Industry: *“A circular economy will underpin this green industrial revolution, designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. Recycling and repairing will be made easier for all, reducing the need to buy new, expensive products on a regular basis.”* Furthermore, page 19 reads: *“Boost the repair and recondition sector with new apprenticeship schemes”* and page 20 sets out our commitment to *“Require manufacturers to offer ten year warranties on white goods, to encourage repair and reuse. We will create a comprehensive ‘right to repair’, to require manufacturers to keep goods operational years after purchase and to ban the practice of producing goods with the intention that they will become obsolete in a few years’ time.”*

### **7 - Area by area energy efficiency retrofit:**

Friends of the Earth asks all parties to “Require and fund local authorities to coordinate area-by-area eco-heating and energy efficiency transformation programmes”. This is precisely what the Green New Deal for housing, put forward in the 2019 manifesto from page 13 onwards, does – it would be operated on a local authority level, requiring and funding local authorities to develop local strategies and implement insulation programmes and deep retrofitting. Funding for local authorities (manifesto page 85) to do this includes: Funding local authorities to better insulate all homes and deep retrofit of 1 million homes a year: £24.6 billion; Funding local authorities to better insulate non-domestic buildings: £7 billion; Funding local authorities to create at least 100,000 new social homes a year: £10.2 billion.

### **8 - Electoral law and the Lobbying Act:**

As you know, the Green Party has been at the forefront of the campaign against this legislation ever since it was proposed in 2013, when [I co-sponsored a reasoned amendment](#) to block the Bill from receiving its second reading in the Commons and then hosted a meeting with many representatives of civil society organisations in parliament, before the committee stage, to help them put their case to MPs. The Green Party’s unambiguous position has always been that the Lobbying Act should be scrapped immediately. The repeal of the Lobbying Act was included in the Green Party’s [2015 manifesto](#) and there has been no change to the Party’s position on this since.

### **9 – Funding for nature and wildlife corridors:**

Whilst we note that we have not stated in the manifesto in so many words that we will meet the Friends of the Earth ask to: “Invest an additional £5.6 billion in mapping, protecting and developing an extensive network of wildlife sites with nature-friendly corridors between them.” the overall focus on nature policies and funding in our manifesto is incredibly strong. Moreover, funding for wildlife sites and nature friendly corridors comes from several parts of the manifesto, given we think much of this should be done on a local level. This would come from a combination

from various funding commitments across the manifesto including: the £1bn budget line for smaller policies on page 85 of the manifesto, the £3bn annual climate adaptation spend, the £10bn extra funding for local councils every year, the £0.8bn allocated to tree and forest planting, and the £1bn of research and development for farming and forestry.

We disagree with Friends of the Earth's decision to ignore parties' positions on Brexit as a critical issue for nature conservation and funding for wildlife, due to both the direct economic impacts on the economy that will squeeze public spending, and also due to the uncertainty this creates over the future of CAP funding (£3.2bn per year) and other EU funding streams that are currently, or could in future be, used for wildlife-related purposes, such as the creation of nature-friendly corridors. We note that there is a 25% target of climate mainstreaming under EU expenditure for 2021-2027, which constitutes a significant opportunity to step up change on climate action, and a lot of work is underway to ensure that delivers on biodiversity too.

#### **10 - Tree cover:**

It is Green Party policy to increase UK forestry cover to the average cover across Europe in the long term [[see here FR200](#)]. This would result in far more than a doubling of current cover. As a rough approximation, UK forest cover is around 11-12%, compared to 42% of the EU.

#### **11- Free Bus Travel:**

As set out in the manifesto, we would give all local authorities control over bus services (as London currently has). This clearly allows for local authorities to introduce free buses as a way of meeting their carbon reduction targets.

#### **12 - Air quality:**

We would like to draw your attention to Green Peer Jenny Jones' Clean Air Bill, which sets out the detail of Green Party policy on air pollution – see [here](#). This establishes that the right to breathe clean air is a fundamental human right and defines clean air with specific reference to “the best available scientific knowledge and guidance on ambient air pollutants from the World Health Organization (WHO)”. Our manifesto also references this legislation and our commitment to new air quality standards for the UK, as well as a new enforcement body (page 58) Given all the policies in the manifesto are designed for implementation over the next ten years, we clearly meet the goal of clear air for all by 2030.

#### **13- Natural gas phase out and excess renewables storage**

As your scoring indicates, we have a costed plan for improving energy storage, however we do not seem to have been allocated any points for this. We also set out in our manifesto that we will: *“Reduce the use of natural gas for heating homes through a programme, to replace polluting boilers with renewable heat from heat pumps, and solar thermal, geothermal, biomass and stored heat technologies.”* (manifesto page 14).

It is also policy to *require District Councils to recover for recycling at least 60% of recyclable domestic waste within 5 years. At the end of this period an increased target will be set of how much further unnecessary waste can be avoided and which incorporates targets for waste reduction and the composting or digestion of organic waste.* (see [NR412](#))

#### **14 – Food Waste**

Our approach is set out on page 18 of the manifesto - *A circular economy will underpin this green industrial revolution, designing out waste and pollution.* We estimate that the overall proposals in our manifesto, which include tackling food waste, would reduce current UK carbon emissions from waste from 20 MtCO<sub>2e</sub> to 8 MtCO<sub>2e</sub> with food clearly included.

#### **15 - Local carbon budgets and raising finance from new sources to fund local carbon action:**

Our entire Green New Deal programme is designed with local and national carbon budgets centre stage. As set out on page 7 of the manifesto it will give power and resources for devolved governments, elected mayors and local governments to transform the communities they represent. This clearly gives local authorities the ability to raise finance from new sources to fund local carbon action.

We also explain that we want local councils to lead the delivery of the Green New Deal and the transition to a resilient, net zero carbon economy. Our entire manifesto is about reaching net zero by 2030 and we are surprised that Friends of the Earth have not recognised that carbon budgets are automatically inbuilt at every level of government. We have created a specific post – the Carbon Chancellor – whose budget work will echo that of the current Chancellor ie setting national budgets and making allocations to local authorities.

#### **16 – Planning:**

The way we would transform the planning system so that it is focussed on carbon reduction and nature restoration is detailed throughout the manifesto - from ensuring new housing doesn't force people into car use, to encouraging the renovation of non-domestic buildings, through making planning consent harder to achieve for new commercial property; from creating a network of electric vehicle charging points across the country by requiring their construction through the planning system to requiring all new buildings built by private developers and new council homes to be built to the Passivhaus standard; from creating new rights of way to protecting inland waterways and requiring councils to plan for and deliver new homes in a way that preserves local ecology and creates new green spaces.

#### **17 - Nuclear:**

It is disappointing to see that there was no assessment of the different parties' positions on nuclear power within the Friends of the Earth scoring, despite it being a clear dividing line in the policies offered at this election. As renewable energy continues to get cheaper and over-deliver, nuclear power remains expensive, unreliable and late to come online. Comprehensive energy modelling from the

[Centre for Alternative Technology](#) finds that nuclear baseload is not useful in a majority-renewables energy system, leading to overproduction at times of peak supply, when what is required is flexibility and storage.

Investing in new nuclear that will not produce any power until the 2030s is therefore a barrier to the action we need to reduce emissions now. This money could, and should, be invested in the renewable energy future we need instead. The Labour Party commits in its manifesto to building new nuclear, whereas the Green Party would consign this out-dated technology to the history books. (manifesto page 11)

### **11 - Economics:**

Most lacking from the Friends of the Earth's assessment is any mention of the primary cause of the climate and ecological emergencies – the global economy. It is not possible to continue with infinite economic growth on a planet with finite atmospheric and natural limits. Only the Green Party is committed to moving beyond growth-at-all-costs and focussing instead on an economy that works for the sustainable wellbeing of both people and nature. The consensus for the old economic orthodoxy is crumbling away. For example, the [European Environment Agency](#) and the [United Nations global assessment of nature and biodiversity](#) both recently addressed the need to move beyond GDP and economies focussed on economic growth, as did a [letter from 238 academics](#) last year. Business-as-usual economics is a fundamental barrier to addressing the ecological and climate crises we face, and it is time for the climate and environment movement to speak truth to power and make this clear.

Our manifesto clearly and robustly sets out how we would re-purpose the economy into one designed to deliver climate action, nature restoration and human wellbeing. We do not think that anything else deserves to be called a transformation. We will specifically replace endless economic growth as the means by which we measure progress with measures of real prosperity and wellbeing, like improvement in health, reduction of inequality and the restoration and protection of the natural environment on which we all depend (manifesto page 8).

For these reasons, I hope you will understand our view that Friends of the Earth's manifesto assessment does not present an accurate picture of our nature and climate offers at this crucial election. I appreciate that you cannot change your ratings at this stage, but I hope that you will consider this letter in full and publicly share it with your supporters, for the sake of transparency and informed debate.

The Green Party will continue to campaign and take action on the climate and nature emergency with the urgency and the ambition the science demands. We will work with any MPs and parties to achieve this, but we will also hold them to account when they fail to meet the greatest challenge of our time.

Yours sincerely,

Caroline Lucas