

**Letter to Friends of the Earth** (Dave Timms, dave.timms@foe.co.uk)

Dear Dave,

Thank you for your email of 27 November, with Friends of the Earth's interim scoring of the Liberal Democrats' election manifesto.

I'm sure you will appreciate that the manifesto cannot possibly include every detail of our policies and approach; it has to be kept to a manageable length. Therefore several of the topics on which you gave us a partial or zero score are nevertheless Liberal Democrat commitments, which would be implemented under a Liberal Democrat government.

In that connection I am happy to attach *Our Plan for Tackling the Climate Emergency*, due to be published this week, as an accompaniment to our manifesto, explaining the detail that lie behind the headline commitments in the manifesto. The bulk of it is drawn from the climate policy paper which was adopted at our conference in September, with some slight amendments and updating; some of the finer detail in the paper is omitted to keep this down to a manageable length.

I am attaching to this letter a list of cross-references between your scoring (zero and partial scores only) and the commitments in this document. It also contains one or two references to other sources of policy that are not covered in *Our Plan for Tackling the Climate Emergency*.

I hope this will enable you to revise your scoring for the Liberal Democrat position. If you have any queries, please direct them to my colleagues.

Finally, let me thank you, and Friends of the Earth, for conducting this scoring exercise. You do an excellent job in keeping us, and the other political parties, up to the mark. After the election I hope we will have the chance to engage further with you in developing our policy platform in the light of new challenges.

Yours

A handwritten signature in black ink that reads "Wera Hobhouse". The signature is written in a cursive, slightly informal style.

Wera Hobhouse

Liberal Democrat Shadow Secretary of State for the Climate Emergency

FoE manifesto item and score	Commitment in <i>Our Plan for Tackling the Climate Emergency</i> or elsewhere
Enact Secondary Legislation to the Climate Change Act 2008 to fully include international aviation and shipping into the UK's carbon targets (0)	See pp. 19–20: emissions from international transport are included in our overall emissions commitments by carbon budget period (see table and graph). See also Section 7.2. Since it is clear that these emissions are included in our targets, we did not think it necessary to add details of the secondary legislation – this would follow automatically.
Rule out the use of international offsetting in meeting UK carbon budgets. (0)	pp. 16–17: ‘Unlike the Conservatives, we would aim to meet this target without the use of international offsets.’
Commit to reduce greenhouse gas emissions from aviation to well below the level in the year 1997 as fast as possible. (0)	The trajectory described in the paper (see pp 19—20) returns international transport emissions to the 1997 level by the mid 2030s.
Cancelling the approval of Heathrow expansion and banning the expansion of regional airports. (0)	We don't meet your commitment exactly, but we are not far off, and we would just observe that Greenpeace gave us a score of 0.35 out of 0.5 for almost exactly the same ask in their manifesto. Could we ask you to consider a partial score?
Introduce a graduated tax to discourage frequent fliers (a frequent flier levy). (0.5)	p. 66: ‘We would therefore reform air passenger duty for international flights to focus on those who fly the most, while reducing costs for those who take one or two international return flights per year. The duty level would be set at zero for the first flight and increase progressively for each subsequent flight in a given year.’ We based this system on the suggested rates of APD set out in the NEF paper <i>Managing Aviation Passenger Demand through a Frequent Flyer Levy</i> (2015), which suggests zero APD for the first flight, the standard rate for the second and successively higher rates for subsequent flights. It is a fact, therefore, that anyone taking one or two flights a year will pay less than they currently do; we see this as an important element of progressivity in the new approach.
Build on the success of the UK's Carbon Price Floor mechanism in reducing coal use by raising the rate to £30/tCO <sub>2</sub> e, and raising it steadily year on year, to accelerate the transition from gas to renewable energy and to provide funds for a heating transformation programme. (0)	p. 34: ‘We would provide additional support by reinstating renewables’ exemption from the Climate Change Levy (apart from biomass, which is not zero-carbon) and increasing the Carbon Price Floor’. We can confirm that we would intend to increase it to at least £30/tCO <sub>2</sub> e, and raise it steadily each year.
Provide £2.3bn of additional public capital per year initially for low carbon heating scaling	See p. 77: we commit £6.4 billion of additional expenditure over 5 years, reaching £2.3 billion by year 5. There are two reasons for a slightly slower trajectory than you call for: (a) we think it will take time to build up the pilot project chain and supply chain – particularly as it is not yet clear

FoE manifesto item and score	Commitment in <i>Our Plan for Tackling the Climate Emergency</i> or elsewhere
to much larger investments in future spending reviews. (0)	what the right solutions are; and (b) we think the higher priority is energy efficiency, which is why we allocate so much to that area. In a future Parliament, we would expect to see much more for zero-carbon heating.
For private rented homes, increase step by step the minimum energy efficiency standards on the path to a minimum EPC band C in 2030, increasing the maximum threshold of spending by landlords to at least £5000. (0)	<p>p. 44: ‘We would introduce a new Green Buildings Act setting the following targets:</p> <ul style="list-style-type: none"> <li>• All homes of low-income households (social, rented or owner-occupied) to reach the highest energy efficiency standard feasible by 2025.</li> <li>• All other homes and non-domestic buildings to reach the highest energy efficiency standard feasible by 2030.</li> </ul> <p>... We will aim for EPC Band A and B for homes, but recognise that for some homes, the highest energy efficiency standard feasible will be below this.</p> <p>... We would use the capital infrastructure budget to provide fully subsidised retrofits for low-income owner-occupiers and for social housing, and funds for improvements in public buildings, including schools, universities, hospitals and local authority buildings. We would scrap the current cost cap on the improvements private landlords are required to undertake to raise their properties to the minimum levels required for renting.’</p> <p>[We can confirm additionally that the minimum standard for the private rented sector would be EPC C, if EPC A or B are not achievable at reasonable cost.]</p>
Produce an overarching food strategy which leads to a shift to sustainable, healthy diets with ‘less and better’ meat and dairy, using regulatory tools, procurement, guidance, and fiscal measures to deliver this shift. (0)	<p>pp. 71–72: ‘Food consumption is one of the drivers of climate change, not just through emissions from UK farms, but also through imports of foodstuffs particularly associated with deforestation, such as palm oil, soy and cocoa; world-wide, clearance for agriculture is the main driver of global forest loss. A long-term approach to food consumption is needed, combining education, persuasion and incentives. There are, however, major potential benefits as well as climate mitigation. Eating a diet rich in fruits, vegetables, nuts and legumes, and reducing consumption of foods such as sugar would have major positive impacts not just on greenhouse gas emissions but on standards of health, and accordingly on incomes and health budgets.</p> <p>This is increasingly recognised by the public, with some projections suggesting that 25 per cent of the population will be vegetarian by 2025, a doubling of the proportion today. Meat substitutes are gradually appearing on the market, and the UK has an opportunity to be a world leader in their production and consumption.</p> <p>We would accordingly introduce a National Food Strategy to promote the production and consumption of healthy, sustainable food, thereby reducing the consumption of unhealthy, unsustainable food. This would focus especially on working with schools to empower children and young</p>

FoE manifesto item and score	Commitment in <i>Our Plan for Tackling the Climate Emergency</i> or elsewhere
	<p>people as citizens and consumers. Crucially, the strategy must aim to ensure that healthy and sustainable food is also affordable.</p> <p>We will work with food manufacturers to reduce the climate impact of their products, drawing on the experience of reductions in salt from government interventions where public health bodies helped industry to collectively reformulate products on a voluntary basis, but with the fallback of regulation if necessary. We would also work with existing food assurance schemes to explore how zero-carbon commitments could be incorporated into their approach; if no progress could be made we would introduce a new scheme. We would use public procurement policy to grow the market for sustainable food and, where appropriate, locally sourced products. The public sector is a major purchaser of food and catering; we would set annual targets for central government public-sector bodies to significantly reduce the climate and health impacts of their food consumption, and encourage local government and the NHS to do the same.'</p>
Invest an additional £5.6 billion in mapping, protecting and developing an extensive network of wildlife sites with nature-friendly corridors between them. (0)	See p. 77: £7.1 billion allocated over five years for environmental land management and nature restoration, plus £6 billion for expanding forests. We can confirm that these sums between them include at least £5.6 billion for wildlife and habitat protection, including mapping, protecting and developing wildlife sites and nature-friendly corridors.
Require planning authorities to plan for sustainable energy generation, working in partnership with communities, energy providers and utilities. (0)	p. 36: 'National planning and regulation of the decarbonisation process requires close cooperation between the National Infrastructure Commission, National Grid and the energy regulator Ofgem, together with the new Regional Energy Partnerships we propose. We would ensure that the remits of all of them, and those of other relevant agencies such as the Crown Estate, are amended to give a high priority to net zero objectives.'
Enable local authorities to raise finance from new sources to fund local carbon action (such as a local public transport payroll levy, visitor lodging levy, or eco-levy for road use, all of which have been successfully used overseas to transform transport). (0)	p. 24: 'Councils clearly need additional resources to accompany these new responsibilities, and we would provide additional funding from central government for the design, implementation and monitoring of Zero-Carbon Strategies. We would also end the current Council Tax capping regime and give councils enhanced powers to call on new income sources such as vacant property taxes. We would replace the existing system of business rates with a new tax on the land value of commercial sites, removing the disincentives to invest created by business rates and enabling the state to better capture increases in land value driven by public infrastructure investment. We would give councils enhanced borrowing powers, including for housing and local infrastructure.'
Require and fund local authorities to coordinate area-by-area eco-heating and energy efficiency	p. 23: 'Local authorities would have a major role to play in particular in developing and implementing energy efficiency and renewable energy programmes for buildings, and we would also encourage them to set up or expand their own renewable electricity generation capacity.'

FoE manifesto item and score	Commitment in <i>Our Plan for Tackling the Climate Emergency</i> or elsewhere
transformation programmes. (0)	p. 49: 'Local authorities would be given the responsibility, as part of their Zero-Carbon Strategies, to develop combined energy efficiency and zero-carbon retrofit programmes (which, as the Energiesprong whole-house retrofits in the Netherlands, also currently being implemented in Nottingham, have demonstrated, can be cost-effective), working with local residents and businesses to develop the optimum outcomes for their communities, including district heating systems where appropriate.'
Rewrite national planning rules to make carbon reduction, and nature's restoration and recovery a legal requirement in the planning system. (0)	<p>p. 64: 'We would amend the National Planning Policy Framework to provide local authorities with clear expectations for the provision of sustainable transport and greater access to goods and services in new housing developments.'</p> <p>p. 74: 'A major national programme of protecting and expanding natural carbon sinks must be developed as a matter of urgency. As in other areas, while central government needs to set the overall framework and provide regulatory and financial incentives, the implementation of real change must be led at a local level. We would transform the Local Nature Partnerships established when Liberal Democrats were in government into Zero-Carbon Nature Partnerships, working with farmers and land managers to audit and map natural capital and carbon sink provision in their area and identify priorities for investment. We would reverse the weakening of the planning system, ensure planners have the skills and resources to support overall carbon reduction targets and place stronger duties on National Park Authorities to create and protect carbon sinks.'</p>
Undertake a comprehensive review of electoral law (including the so called 'Lobbying Act) to ensure it is fit for the digital age, provides genuine transparency on lobbying, electoral donations and spending, and protects the voice of legitimate civil society. (0)	You say there is 'no mention' of these commitments, but that is not true; the extracts you quote from the manifesto ('Strengthen and expand the lobbying register and ban MPs from accepting paid lobbying work' and 'Work towards radical real-time transparency for political advertising, donations and spending, including an easily- searchable public database of all online political adverts') actually match exactly your call for 'genuine transparency on lobbying, electoral donations and spending'. Can you consider a partial score?
Protect the right to peacefully protest including from corporate anti protest injunctions and end labelling peaceful, environmental activists as domestic extremists. (0)	<p>A policy motion from the 2012 conference included:</p> <p>' The right to protest to be restored through:</p> <p>a) The repeal of the offence of 'Aggravated Trespass', as set out in Sections 68 and 69 of the Criminal Justice and Public Order Act 1994 and used in the Fortnum and Mason trial.</p> <p>b) A properly regulated right to protest in quasi-public spaces to balance the interests of citizens and landowners.</p> <p>c) An end to threats being made against protestors who have done nothing wrong, such as the threatened use of rubber bullets before demonstrations.</p>

<b>FoE manifesto item and score</b>	<b>Commitment in <i>Our Plan for Tackling the Climate Emergency</i> or elsewhere</b>
	d) The end of kettling large groups of people. e) Resisting new powers to impose curfews on unconvicted people. f) Not extending the existing powers on people covering their faces. We can confirm that these remain Liberal Democrat commitments, to be implemented in government.