

Defra consultation on draft guidance for how to measure and report greenhouse gas removals and emissions from woodland creation

Response by the English National Park Authorities Association

December 2010

1. Introduction

- 1.1 The English National Park Authorities Association (ENPAA) exists to support the policy-making process by co-ordinating the views of the ten English National Park Authorities. It is governed by the Chairs of the ten Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). We are happy for this response to be made publicly available and would be happy to discuss any of the points we make further with officials if that would be helpful.
- 1.2 National Park Authorities are special purpose authorities that operate within the local government framework, and are funded through Defra with statutory purposes as set out in the *Environment Act 1995*. They are charged with helping to look after England's National Parks. These are largely rural areas of the country that make up 9.3% of England's land area. A significant aspect of NPA work relates to climate change mitigation and adaptation, which includes both land management activities and helping National Park communities move towards a low carbon future. As part of their role in demonstrating local leadership, NPAs are actively reducing their own organisational emissions.
- 1.3 ENPAA welcomes Defra's consultation on draft guidance for how to measure and report greenhouse gas removals and emissions from woodland creation. We support this move to give UK organisations a clear way to set out the carbon benefits that arise as a result of their investment in UK woodlands. While investing in offsets as part of a carbon reduction strategy (generally meaning investing in overseas projects) is appropriate for some organisations, it is also important to recognise the efforts to reduce greenhouse gas emissions through investment domestically.

2. Summary

- 2.1 National Park Authorities have a dual interest in the consultation in terms of their own organisational emission reduction plans and for attracting new investment into woodland planting in National Parks. NPAs continue to reduce the emissions resulting from their activities, but have taken a decision not to pursue official carbon neutrality status since this will inevitably mean investing in overseas offsets¹. NPAs do, however, invest in carbon-reduction projects within National Parks, including woodland creation. NPAs support the proposal that greenhouse gas removals as a result of NPA investment in woodlands could be deducted from their gross emissions.
- 2.2 Woodlands are widely recognised as having an important role to play in climate change mitigation and adaptation. NPAs are strong supporters of tree planting as part of the response to climate change. The recently published Government circular *English National Parks and the Broads* includes a vision for the future of National Parks in which 'woodland cover has increased and all woodlands are sustainably managed, with the right trees in the right places.' Paragraph 45 provides further detail of how Government expects NPAs,

¹ In fact, as set out in the response to the DECC consultation on the term carbon neutral (May 2009), NPAs may not be able to invest their public funding to purchase carbon offsets that fund overseas carbon offset projects without acting *ultra vires*.

working with the Forestry Commission, landowners and others, to facilitate increased tree planting. Clearly, lack of public funding for a step-change in the amount of woodland creation is one of the barriers to be overcome. Providing an incentive for private investment by explicitly acknowledging the associated carbon benefits may help to increase monies available for tree planting.

3. Responses to consultation questions

3.1 Does the guidance provide a clear means of disclosing the effects on carbon abatement associated with investment in domestic woodland projects?

The proposal to set out annual gross emissions, removals from woodland creation and consequent net emissions are clear.

3.2 Do you agree that this guidance will help promote investment in domestic woodland projects? If not, could the guidance be improved to meet this aim, or are there other barriers?

ENPAA strongly supports the proposed guidance. Lack of guidance and clarification relating to how GHG emission reductions from woodland creation contribute to a company's annual emissions report will restrict potential investment for those domestic woodland projects where the purpose of the investment is carbon emission reductions. Therefore, although ENPAA is not in a position to state whether it will result in increased investment, the guidance is addressing a current barrier to domestic woodland project investment. Anecdotally, we would observe that tree planting appears a popular choice for those looking to balance carbon emissions. It is clear that the new guidance will require significant promotion by Government and others to raise awareness among UK organisations. Barriers to uptake that may need to be addressed include:

- the complexity (perceived or real) of the scheme taken as a whole, i.e. including the requirements of the Woodland Carbon Code;
- a lack of understanding by organisations of the difference between this scheme, officially approved overseas offsets and other unofficial domestic "offset" schemes available; and
- landowners not coming forward with land they are willing to convert to woodland.

3.3 Do you agree that the guidance on how to report on domestic woodland creation should only be used in conjunction with the Woodland Carbon Code? If you disagree, what alternative to the Woodland Carbon Code do you propose?

We agree with the intention to have a single unifying standard to record and assess woodland projects, but note that the Woodland Carbon Code is still in its pilot phase and so is not yet properly tested. It will be important that the guidance and the Woodland Carbon Code are reviewed to ensure that they are fit for purpose once organisations begin to use them for real.

3.4 Is the guidance on identifying ownership and the roles and responsibilities of the different parties in Step 1 clear?

Yes, this section of the guidance is clear.

3.5 Do you agree that companies should be able to invest in existing projects (as well as new projects) where they meet the criteria under the Woodland Carbon Code?

No comment.

3.6 Do you agree that you should use the carbon assessment tools available from the Woodland Carbon Code website in Step 2? If not, what models and methodologies would you suggest?

We agree that the Woodland Carbon Code tools should be used – as noted at 3.3 we support the use of a single methodology. In relation to carbon assessment, this should ensure consistency across projects. The provision of carbon sequestration lookup tables for different species, planting densities, etc is particularly helpful. It will be important to ensure that the methodology for calculating future carbon sequestration once projects have been initiated is not overly complex (this area is not yet defined within the Woodland Carbon Code). Additionally the overall complexity of the Code may be a barrier (as mentioned above in paragraph 3.2), particularly to those with limited forestry knowledge/ experience. This could be addressed by including worked examples and ensuring that a contact at the Forestry Commission is available to provide further advice (beyond the duration of the pilot period).

3.7 Is it clear in Step 4 who can report carbon removals (as deductions from their overall gross emissions) from a woodland creation project?

Yes, this is clearly set out in the guidance.

3.8 Do you agree that: (a) GHG emissions from woodland creation projects and woodland removal should be included in gross GHG emissions; (b) GHG removals from woodland creation projects should not be included within the gross figure but instead should be listed alongside other emission reduction activities, i.e. offsets or green tariffs.

We understand that initial GHG emissions over a one or two year period caused as a result of some types of woodland creation need to be accounted for. These will be relatively insignificant in comparison to the carbon sequestration over the lifetime of the project and the proposal to include them as scope 3 gross emissions appears reasonable. We support GHG removals from woodland creation being listed alongside offsets to arrive at a net GHG emissions figure. By listing these woodland projects outside the gross figure, organisations can draw attention to the carbon benefits they have brought about as a result of their investment.

3.9 We welcome your comments on the attached impact assessment for this policy. We welcome information on costs and benefits outlined in the impact assessment.

It will be important to consider the combined complexity of the guidance with the finalised Woodland Carbon Code and whether the administrative burden will deter prospective investors.

3.10 Does the guidance provide enough detail? Are there any issues on which you would welcome further guidance or greater clarity?

The level of detail in the guidance is sufficient.