



The Fifth Carbon Budget - Call for Evidence

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Question and Response form

When responding please provide answers that are as specific and evidence-based as possible, providing data and references to the extent possible. Please limit your response to a maximum of 400 words per question.

Questions for consideration:

A. Climate Science and International Circumstances

Climate science and international circumstances are important criteria in setting carbon budgets.

- The science indicates the impacts associated with different levels of climate change and the limit on emissions globally if these risks are to be contained.
- International circumstances inform the prospects of future action to reduce emissions globally, potential requirements of the UK to contribute to those actions, and prospects for low-carbon technology development and carbon pricing.
- The EU places obligations on Member States to reduce emissions to contribute to reductions in the bloc as a whole. These imply a minimum level of effort for the UK's carbon budgets.

The Committee intends to draw primarily on the work of the IPCC, as published in the Fifth Assessment Report, in assessing the implications of climate science for the budget advice

The Committee's advice is based on a climate objective to limit central estimates of temperature rise to as close to 2°C as possible, with a very low chance of exceeding 4°C by 2100 (henceforth referred to as "the climate objective"). This is broadly similar to the UNFCCC climate objective, and that of the EU.

In order to achieve this objective, global emissions would have to peak around 2020, before decreasing to roughly half of recent levels by 2050 and falling further thereafter.

The UNFCCC is working toward a global deal consistent with such reductions. Individual parties are submitting pledges for effort beyond 2020, with the details of the agreement to be discussed in Paris late in 2015.

The EU has agreed a package that requires a reduction in emissions of at least 40% on 1990 levels by 2030, on the way to an 80-95% reduction by 2050. The UK Government supported this package, while arguing for an increase to 50% in the context of a global deal.

The US and China have jointly made pledges for the period beyond 2020. The US has pledged a reduction of 26-28% by 2025 versus 2005, requiring a doubling of the rate of carbon reduction compared to 2005-2020 and on a trajectory to economy-wide cuts of the order of 80% by 2050. China has pledged to peak CO₂ emissions around 2030, and to make best efforts to do so earlier.

Question 1 *The IPCC's Fifth Assessment Report will form the basis of the Committee's assessment of climate risks and global emissions pathways consistent with climate objectives. What further evidence should the Committee consider in this area?*

ANSWER: No response

Question 2 *To what extent are the UN talks in Paris likely to have implications for the Committee's advice beyond the pledges and positions announced in advance of the talks?*

ANSWER: No response

Question 3 *Based on the available evidence, does the EU 2030 package reflect the best path to its stated 2050 ambition? How might this package change, specifically its targeted emissions reduction, either before the end of Paris or after Paris?*

ANSWER: Citizens Advice is not in position to comment on the possibility of future changes to the EU 2030 package.

We welcome improvements it makes compared to the 2020 package, most prominently by improving technology choice flexibility by resisting defining zero carbon production targets purely in terms of renewable generation, which may have precluded Member States from considering other options where they are viable. This should decrease the costs to consumers both nationally and across the European Union (noting that power is traded across borders).

However, we are still not satisfied that the Commission has put improving affordability at the heart of its 2030 framework. It should give greater priority to the socio-economic dimension of sustainability and build in mitigatory measures that address the distributional impacts of its policies. If the package is not affordable to those paying the bills, it will lose public support and efforts to decarbonise will not be sustained.

We are also concerned that the 2030 package does too little to ensure that the heaviest polluters contribute to the cost of climate policies. In the UK and across the EU, various exemptions or rebates are available to heavy industry against the costs of climate policies. The more countries take such an approach, the greater the pressure on the rest to follow suit in order to avoid competitive disadvantage. This leads to a perverse outcome: that those who pollute the most, pay the least. It flies in the face of the commonly accepted principle of “polluter pays” and embeds the opposite: non-polluter pays.

We recognise that industrial consumers feel the pain of high energy prices, but so do domestic consumers. Dumping costs on the latter to cushion the former is neither fair nor a recognisable part of a credible long-term solution that would encourage heavy polluters to clean-up their act. As part of its 2030 framework the Commission should curtail attempts by Member States to protect national industry against those of others Member States by displacing this financial burden on to domestic consumers.

Question 4 *How does the UK’s legislated 2050 target affect its ability to support international efforts to reduce emissions, including its position in negotiations? Does the level of UK carbon budgets have any additional impact (over-and-above the 2050 target) for the UK in international discussions?*

ANSWER: No response

B. The cost-effective path to the 2050 target

The carbon budgets need to set a path that is achievable from today without being over-optimistic about what is achievable in later periods to prepare for the 2050 target.

The Committee has previously set out scenarios for 2030 that balance effort before 2030 with potential opportunities from 2030 to 2050. The scenarios aim to include

ways of reducing emissions that are likely to be relatively low cost and actions that will develop options that may need to be deployed at scale by 2050.

These scenarios, reviewed in detail in the Committee's report *The Fourth Carbon Budget Review – the cost-effective path to the 2050 target*, include substantial investment in low-carbon power generation, roll-out of low-carbon heat (heat pumps and district heating), development of the markets for ultra-low emissions vehicles and a combination of energy efficiency measures and fuel switching in industrial sectors.

The scenarios also reflect detailed assessments of what is practically deliverable, and the Committee monitors progress towards them as part of its statutory duties. The *2014 Progress Report to Parliament* indicated that current policy would not be enough to meet the fourth carbon budget, but that the 'policy gap' could be closed at affordable cost.

The set of policy options required to close the gap include:

- Strengthening the EU Emissions Trading System.
- Setting a clear objective for Electricity Market Reform (EMR) beyond 2020.
- Focusing on low-cost residential energy efficiency.
- Simplifying policies targeting commercial energy efficiency.
- Tackling financial and non-financial barriers to low-carbon heat.
- Pushing for strong EU targets for new vehicle efficiency in 2030.

The Government has subsequently published various documents, including its formal response, as required under the Climate Change Act, and the National Infrastructure Plan. The Plan includes investments of around £100 billion in low-carbon power generation in the 2020s, in line with the scenarios from the EMR Delivery Plan that reach 100 gCO₂/kWh by 2030. It also has significant investments in offshore oil and gas and in the road network. This includes £15 billion of new spending on roads and around £50 billion on offshore oil and gas.

Question 5 *In the area(s) of your expertise, what are the opportunities and challenges in reducing emissions to 2032, and at what cost? What may be*

required by 2032 to prepare for the 2050 target, recognising that this may require that emissions in some areas are reduced close to zero?

ANSWER:

Future carbon reduction will clearly continue to be a significant challenge. Among the technologies available to decarbonise the power sector, almost all face considerable constraints. One of the most cost-effective, onshore wind, looks likely to be increasingly thwarted by the planning system, and the new Government has a manifesto commitment in place to halt their spread and “end new public subsidy” (what that means in practice is still unclear). Meanwhile, one of those technologies which models have depended on to achieve large-scale reductions both in the UK and worldwide, CCS, remains in the starting blocks, deployed minimally on a global scale and not at all in the UK. Both nuclear and offshore wind, from which major expansions are expected, require very high guaranteed prices to be built, and carry the legacy of poorly negotiated and increasingly uncompetitive contracts. Money continues to be spent on high unit-cost generation technologies with no clear pathway of demonstrated cost reductions, and with no criteria to assess when they will see subsidy support cut off if they fail to improve. The impact of this is that, in the short term, less decarbonisation is achieved per pound spent than would be the case if cheaper technologies were preferred, while also failing to bring forward technologies for anticipated future deployment.

As well as these potentially missed opportunities with generation technologies, we also foresee significant currently untapped opportunities from energy efficiency. To keep the UK on track with existing carbon budgets, and to meet a demanding 5th carbon budget, lagging energy efficiency policy will have to be put back on track.

Citizens Advice wants all low income homes to be given measures, by 2025, to bring them up to Band C on an Energy Performance Certificate (EPC), and for all other households to be offered 0% interest loans to improve them to an equivalent EPC standard by 2035; delivered as part of a major infrastructure investment programme. Research by Verco and Cambridge Econometrics [1] shows how such an approach (costing £3.1 billion 2015-2020 [2]) could eliminate fuel poverty and deliver a range of economic and environmental co-benefits:

- 2.27 : 1 ratio of benefits to costs (Value for Money), which would classify this as a “High” Value for Money infrastructure programme
- Net benefit of £4.95 billion per annum in energy bill savings across the housing stock (after able-to-pay energy efficiency loans have been repaid)
- 23.6 MtCO₂ reductions per annum by 2030, after accounting for direct, indirect, and economy-wide rebound effects. This is roughly equivalent to cutting the CO₂ emissions of the UK transport fleet by one third.

The cost of these measures could be met through the following mechanisms [4]:

- Maintain ECO at current levels – £860 million pa (England’s ‘share’ of ECO resources) – with responsibility for delivery transferred to local contractors, as proposed by ‘Help to heat’ and this report.
- Require private landlords to meet the EPC D standard through regulation rather than through tenants paying for improvements through ‘Green Deal’ loans. This would entail landlords spending about £230 million pa to improve the 723,000 private rented homes below EPC D by 2020, assuming an immediate start.
- Similarly, set a minimum EPC D standard by 2020 for all social housing, as is already the case in Scotland (the standard is EPC C for gas heated homes). This would require social housing providers spending around £85 million pa to improve the 317,000 social properties below EPC D by 2020, also assuming a start this year.
- New housing developers must provide around £190 million pa from 2017 onwards as part of the ‘Allowable solutions’ provisions.
- Government must provide funding of £1.6 billion pa from public expenditure. Many organisations advocate using a secure long-term revenue stream, such as that provided by carbon taxes, for these funds. Designating energy efficiency as a national infrastructure priority [2] would provide long-term certainty to the energy efficiency industry and reduce investment costs due to reduced risk.

[1] Verco and Cambridge Econometrics (2014) *Building the Future: Economic and fiscal impacts of making homes highly energy efficient* <http://bit.ly/1tjXVid>

[2] Assuming similar level of ECO investment per annum to 2020, the additional investment required in the first parliamentary term is £3.1bn.

[3] UKGBC (2014) *A housing stock fit for the future: Making home energy efficiency a national infrastructure priority* <http://bit.ly/SW9n40>

[4] Citizens Advice (2014) *Raising standards, cutting bills* <http://bit.ly/1EBbDPR>

Question 6 *What, if any, is the role of consumer, individual or household behaviour in delivering emissions reductions between now and 2032? And, separately, after 2032?*

ANSWER:

In addition to paying the majority of the costs of decarbonisation, consumer’s behaviour

also plays a substantial role in delivering carbon reductions. Energy efficiency offers a cost-effective way to reduce carbon emissions, but only if the individual customers want to take action.

The UK Government previously estimated that efficient use of energy in property and from appliances could reduce demand by 1,96TWh in 2020, equivalent to a 39 per cent reduction in annual demand, or the output of 22 power stations. Of this, the Department of Energy and Climate Change (DECC) estimates[1] that it could be cost effective to reduce energy demand in the domestic sector by 56TWh in 2020 (an 11 per cent reduction) and 62TWh in 2025, (12 per cent reduction), and that policies are already in place to tackle much of this (55TWh in 2020; 64TWh in 2025).

A study[2] of savings from behavioural changes suggests further significant savings, mostly from space and water heating, such as a 33TWh saving from turning thermostats down by 2 degrees from 20°C to 18°C. However, such changes would be inappropriate in some homes, undesirable in others, and time-sensitive or space-sensitive in most homes.

This complexity has led successive governments to focus the bulk of investment and policy effort on measures affecting the generation side. Energy efficiency policy, meanwhile, has fallen behind schedule, jeopardising earlier carbon budgets and raising the difficulty level for the 5th budget. The downside of focusing investment and subsidies on the supply side is that Government policy fails to address ever-present and growing concerns about household energy bills and affordable heating. A concern which can only be met, ultimately, by improving the quality of the housing stock and reducing energy demand through smarter homes, products and services.

The focus on the supply-side also fails to prepare the system for significant disruption from new technologies. For example, will some consumers choose to reduce their exposure to centralised generation by investing in storage and renewable energy technologies, and how does this impact on those customers who lack this flexibility, due to affordability or wealth? This could be a particular problem after 2030, should renewables plus storage come close to grid parity in the UK.

Energy use is largely habitual and demand for energy efficiency will only emerge when the benefits of change clearly outweigh the barriers. At present the barriers still clearly outweigh the potential saving on energy bills and perceived hassle of having measures installed, meaning the uptake of cavity and solid wall insulation, and of efficient appliances, is behind target [3]. Customers are generally disengaged in the energy market due to confusion about the complexity of the market, bills and tariffs; distrust of pricing; and a view that suppliers act as a pack[4]. Their ability and desire to fight back has been limited by the quality of housing and heating systems; a culture that sees insulation as a low priority; poor design of heating controls[5]; and unenforced or unclear energy

performance regulations for products[6] and homes[7].

These barriers may be overcome through strategic interventions in the energy services markets, or they may be overcome by consumers, enabled by new technology, reacting against higher bills and lower trust in energy suppliers. Whilst we welcome consumers taking control of their bills, Citizens Advice wants visionary leadership to ensure that the changing costs of generating and supplying low carbon power are affordable and fairly applied to customers' bills.

[1] DECC (2012) *Annex E: the energy efficiency marginal abatement cost curve*, in <http://bit.ly/1COQqAJ>, p87

[2] DECC (2012) *How much energy could be saved by making small changes to everyday household behaviours?* <http://bit.ly/10h41F4>

[3] CCC (2014) *Progress Report*

[4] Consumer Focus (2013) *Switched on? Consumer experiences of energy switching*, <http://bit.ly/1vG7Zmq>

[5] Consumer Focus (2013) *Consumers and heating controls*, <http://bit.ly/1pwjVky>

[6] Consumer Focus (2012) *Under the influence*, <http://bit.ly/1s1rq2J>

[7] Consumer Focus (2011) *Room for improvement*, <http://bit.ly/1b11YHH>.

Question 7 *Is there evidence to suggest that actions to further reduce emissions after 2032 are likely to be more or less challenging to achieve than actions in the period up to 2032?*

ANSWER:

In the domestic sector, energy efficiency policies to date have focussed on cost-effective measures, an approach that is reiterated in the 2015 Conservative Manifesto. Citizens Advice supports a cost-effective approach but this should be a strategy for the coming decades not a parliamentary term. The cost of carbon emission reductions should be applied fairly across the generations.

The scale of the actions required in the Fifth Carbon Budget period will be dependent on the actions taken up to that date. Any shortfall in the runup to 2032 increases the challenge:

- Improving Britain's housing stock is a large-scale and labour-intensive exercise. This is good for jobs and local economies if managed over time, but costs rise (and quality potentially falls) if works are rushed over a short period of time.
- The opportunity to reduce carbon through electric heating (heat pumps or storage) is dependent on progress on power decarbonisation, better network management and building fabric efficiency; and the opportunity to reduce carbon emissions through the transition to electric vehicles is also dependent on network development and power decarbonisation.
- It is not necessarily more cost-effective to only pick the lowest-hanging fruit. More expensive measures, that are necessary to meet 2030 targets, may be more cost-effectively installed alongside lower cost measures, as part of a whole house approach.
- Fabric efficiency has a long-term impact, the sooner it is applied, the greater the carbon savings (and bill savings) per pound spent.

Question 8 Are there alternatives for closing the 'policy gap' to the fourth carbon budget that could be more effective? What evidence supports that?

ANSWER:

- Make home energy efficiency a national infrastructure priority, enabling fair competition for long-term public and private investment.
- Ensure vulnerable consumers benefit from the smart meter rollout, giving them not just information but control, through benefit eligibility checks and the installation of energy efficiency measures, including heating controls.
- Move responsibility for energy efficiency programmes from energy companies to local agencies, who know their housing stock and its residents best, with fairer funding through the public purse not energy bills.
- Focus grants on low income families, so households don't fall through gaps in the definition of fuel poverty
- Embed the value of energy efficiency in the housing market, as property sales and renovations are key triggers for investing in energy efficiency measures. Information and finance will not in itself trigger action. Offer low interest loans for energy efficiency improvements and replace the Green Deal Home Improvement Fund with better value consumer incentive schemes, such as Council Tax and stamp duty rebates.
- Provide a genuine minimum energy efficiency standard for private rental tenants, by ensuring proposed legislation is enforceable, and setting a trajectory for higher

standards in future.

- Continue with the Levy Control Framework, to provide budgetary discipline on new consumer liabilities.
- Procure new low carbon generation through competitive means such as auctioning or tendering by default, not by exception.
- Allocate the bulk of the budget for new low carbon generation to mature technologies that provide the most cost efficient decarbonisation.
- Fund any speculative investments considered too unique or immature to be subject to competition through alternatives to bill funded CfDs, i.e. expand the CCS funding approach and/or use its unallocated funding.
- Scrap the Carbon Floor Price; if it is not scrapped use its proceeds to fund an ambitious energy efficiency programme with a focus on the fuel poor.
- Fully explore international opportunities to maximise emissions reduction, including developing cross-border trading of obligations, increased electricity interconnection, and reforming the emissions trading system.
- Ensure that other sectors, including agriculture, transport and aviation are continuing to make progress in reducing emissions alongside the energy sector.

Question 9 *Are the investments envisaged in the National Infrastructure Plan consistent with meeting legislated carbon budgets and following the cost-effective path to the 2050 target? Would they have wider implications for global emissions and the UK's position in international climate negotiations?*

ANSWER:

There are a number of investments identified in the National Infrastructure Plan which have implications for decarbonisation. Over £100 bn investment in the energy system alone is foreseen between now and 2021. The projects identified span a wide range of cost-effectiveness, but omit some crucial and good value investment opportunities.

Citizens Advice has previously expressed serious reservations about the price and duration of the contract proposed for Hinkley Point C, as well as the opaque nature of that deal. To be assured of the cost-effectiveness of other proposals highlighted in the Infrastructure Plan, including further nuclear projects and proposed tidal lagoon facilities at Swansea Bay and elsewhere, we are keen that lessons from the Hinkley deal and Final Investment Decision Enabling for Renewables are properly learned. This includes the

importance of using competition wherever possible to contain costs for consumers, and ensuring that the full details of contracts to which consumers are the effective counterparty are made visible.

When budgets are constrained, choosing more expensive technologies will reduce the resources available to less expensive ones, and will diminish the total amount of decarbonisation that can be bought with any given budget.

Furthermore, we are keen to see investment in less developed technologies carried out with a strong emphasis on their global scalability and potential contribution to tackling climate change at an international level, and not focusing solely on UK-specific options. Where consumers are being asked to support investments at prices higher than prevailing wholesale prices, we want to see that technology learning is occurring that contributes to efforts to tackle climate change. We are concerned that some projects proposed, including the nuclear and tidal programmes, show insufficient technology development potential to merit the high fixed prices they have been awarded or are requesting.

We are also concerned that the Infrastructure Plan currently omits demand-side measures that deliver greater benefits at a lower cost to other, better-funded policy instruments. Energy efficiency is the most cost-effective way to reduce energy bills and tackle fuel poverty, while also lowering our carbon emissions and aiding the transition to a low-carbon economy. No other investment can achieve so much for individual householders and for the economy as a whole. Designating energy efficiency as a priority should be backed up by increasing capital investment. Funding by central government is particularly desirable.

C. Budgets and action

The UK's statutory 2050 target requires actions across the economy to reduce emissions. Many of these actions will be driven by (UK and devolved) Government policy and implemented by businesses and consumers. There will be an important role for Local Authorities in successful delivery.

Although the carbon budgets do not require specific actions, they provide an important indication of the overall direction that policy will take in future. Once set, carbon budgets can only be changed if there has been a significant change in the relevant circumstances set out in the Climate Change Act.

Feedback from businesses as part of the Committee's 2013 Call for Evidence for the review of the fourth carbon budget was that stability is an important and valuable characteristic of carbon budgets.

Question 10 *As a business, as a Local Authority, or as a consumer, how do carbon budgets affect your planning and decision-making?*

ANSWER: No response

Question 11 *What challenges and opportunities do carbon budgets bring, including in relation to your ability to compete internationally? What evidence do you have for this from your experience of carbon budgets to date?*

ANSWER: No response

Question 12 *What would you consider to be important characteristics of an effective carbon budget? What is the evidence for their importance?*

ANSWER:

An effective carbon budget will encourage and enable the delivery of energy services that are affordable, accessible and safe for all. [1]

1. Affordable

Energy is an essential service. Keep it affordable by giving consumers the ability to control their energy use, and minimising the costs that are passed on by industry and government through bills. Profits need to be earned; and today's hard-pressed consumers cannot carry the full costs of lack of investment in the past and the high upfront cost of low carbon generation.

2. Accessible

Customers need simplicity. Ensure access to advice, supply, products and services is hassle free and quick. If products and systems are not easy to use,

energy and cost saving potential is quickly lost. The energy services market itself needs to be accessible – whether that is to new generators and suppliers in the energy market or to products and services used in the home. Innovation is key to answering the challenges of the 21st century.

3. Safe

There have been a myriad of industry scandals. Customers should not be mis-sold to, misled or face requests for unreasonable fees or demands. Regulations must be enforced, and when things go wrong there must be an easy way to get resolution and redress. Consider also the needs of future consumers. The upfront costs of moving to a low carbon economy are a vital investment for long-term benefits. The indirect benefit of mitigating climate change is more than matched by the direct benefit of healthier, cheaper-to-heat homes that could eliminate fuel poverty.

4. Fair

Energy services must meet the needs of all consumers including those who are vulnerable because of their particular circumstances such as income, health, heating system or housing. This means calls for cost-reflectivity must be tempered by the need to ensure all consumers can meet their basic needs, now and in the future.

[1] Citizens Advice (2014) *Taking control*

D. Other issues

The Climate Change Act requires that in designing the fifth carbon budget we consider impacts on competitiveness, fiscal circumstances, fuel poverty and security of energy supply, as well as differences in circumstances between UK nations. High-level conclusions on these from our advice on the fourth carbon budget were:

- **Competitiveness** risks for energy-intensive industries over the period to 2020 can be addressed under policies already announced by the Government. Incremental impacts of the fourth carbon budget are limited and manageable.

- **Fiscal impacts.** The order of magnitude of any fiscal impacts through the 2020s is likely to be small, and with adjusted VED banding and full auctioning of EU ETS allowances could be neutral or broadly positive.
- **Fuel poverty.** Energy policies are likely to have broadly neutral impacts on fuel poverty to 2020, with the impact of increases in electricity prices due to investment in low-carbon generation being offset by energy efficiency improvement delivered under the Energy Company Obligation. Incremental impacts through the 2020s are likely to be limited and manageable through a combination of further energy efficiency improvement, and possible income transfers or social tariffs.
- **Security of supply** risks due to increasing levels of intermittent power generation through the 2020s can be managed through a range of flexibility options including demand-side response, increased interconnection and flexible generation. Decarbonisation of the economy will reduce the reliance on fossil fuels through the 2020s and thus help mitigate any geopolitical risks of fuel supply interruption and price volatility.
- **Devolved administrations.** Significant abatement opportunities exist at the national level across all of the key options (i.e. renewable electricity, energy efficiency, low-carbon heat, more carbon-efficient vehicles, agriculture and land use).

Question 13 *What evidence should the Committee draw on in assessing the (incremental) impacts of the fifth carbon budget on competitiveness, the fiscal balance, fuel poverty and security of supply?*

ANSWER:

Question 14 *What new evidence exists on differences in circumstances between England, Wales, Scotland and Northern Ireland that should be reflected in the Committee's advice on the fifth carbon budget?*

ANSWER:

Citizens Advice believes that consideration should be given to the distinct demographic makeup of each of the four nations in the UK. Wales, Scotland and Northern Ireland all have housing stock in worse condition than the UK average and higher numbers of people on benefits and living in poverty. Consequently, these countries have higher rates of fuel poverty. Indeed, according to Welsh Government statistics compiled in 2012, 30% of all Welsh households and 31% of those in social housing were living in fuel poverty. [1]

This number is likely to have increased in interim years as a result of benefit sanctions and increases in fuel bills.

Citizens Advice believes that the Committee should have regard of these demographics and should by implication support targeting funding for energy efficiency schemes in Northern Ireland, Wales and Scotland. We believe that addressing fuel poverty and meeting carbon targets should be handled as two sides of the same coin.

[1] <http://gov.wales/docs/caecd/research/130430-wales-fuel-poverty-projection-tool-2011-12-report-en.pdf>

[2] <http://www.ons.gov.uk/ons/rel/subnational-health2/excess-winter-mortality-in-england-and-wales/2013-14--provisional--and-2012-13--final-/index.html>

[3] <http://gov.wales/topics/environmentcountryside/energy/efficiency/home-energy-efficiency-scheme-facts/?lang=en>

[4] <http://gov.wales/topics/environmentcountryside/energy/efficiency/arbed/?lang=en>

[5] <http://gov.wales/topics/environmentcountryside/farmingandcountryside/farming/schemes/glastir/?lang=en>

[6] <http://www.carbontrust.com/client-services/wales>

Question 15 *Is there anything else not covered in your answers to previous questions that you would like to add?*



ANSWER: