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.

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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 CO_2 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:

Shell fully supports the pre-eminence of the IPCC's Fifth Assessment Report as the basis for the Committee's work in terms of climate risks and global emissions pathways. In addition, we would also recommend consideration of both UK specific decarbonisation studies, such as the Energy Technology Institute's "UK scenarios for a low carbon energy system: Clockwork or Patchwork?" as well as the International Energy Agency's assessments of the world energy system that gives a wider context of energy use and emissions pathways – notably its World Energy Outlook 2014 and 2015 (due November 2015) and forthcoming (June 2015) "Special Report on Energy and Climate".

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:

Given that one of the Committee's criteria for setting carbon budgets includes any change to international circumstances that inform the prospects of future action to reduce emissions globally then the outcomes of the Paris talks, including details of Nationally Determined Contributions (NDCs) and not just the announced targets in advance of that, should be a fundamental consideration for the Committee's advice.

The outcome of the Paris talks may have significant implications for the EU's own 2030 targets and decarbonisation pathway should the outcome be considerably lower or higher in ambition than envisaged when the EU2030 package was agreed in 2014. The Committee's advice and the UK's approach in terms of decarbonisation pathways and budgets should therefore avoid being significantly out of step with international and EU targets and pathways. This will ensure the UK remains competitive globally, avoid emissions leakage from the UK to the EU or elsewhere which would limit the UK's meaningful contribution to global emissions reduction, and avoid significant costs being imposed on UK consumers and industry.

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:

Shell welcomes the EU Commission's 2030 package based on a single, ambitious greenhouse gas target with support for energy intensive industries from carbon leakage. We believe this package should be underpinned by a strengthened EU ETS that ensures a robust carbon price to allow low carbon technologies to develop and integrate into a fully functioning internal energy market in a cost effective way.

It is essential that in the coming months an appropriate governance system for the 2030 package is in place to ensure that the objectives of EU energy policy - achieving a more competitive, secure and sustainable energy system - and its long-term 2050 greenhouse gas reductions target are met whilst allowing Member States the flexibility to make optimal choices with regards to the decarbonisation of their energy mix. As such we do not believe there is justification for the governance system or any other policy instrument to reintroduce the concept of mandatory Member State level renewable or energy efficiency targets, either pre or post the Paris COP.

Transport will need to contribute to EU GHG reduction targets for 2030 and 2050 through policies that give full consideration for the competitiveness of the EU economy and the economic and mobility needs of its citizens and businesses. A mosaic of drivetrain technologies and fuels will be needed to decarbonise transport. Deployment of new alternative drivetrains and fuels requires action by all parties: vehicle manufacturers, fuel producers, fuel retailers, and consumers. Policies need to take an integrated and coordinated approach that aligns the incentives and actions by all parties.

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:

The UK, with the Climate Change Act's legally binding targets, is seen by many

around the world as a leader in climate legislation, with other countries such as Mexico introducing legislation based on the Act. This leadership provides an opportunity for the UK to influence global emissions reduction discussions and efforts.

However, in order to ensure a level playing field for UK industry the UK should avoid having much more stringent unilateral emissions reduction targets without them resulting in reciprocated approaches in other advanced economies given the limited contribution further targets would have on reducing global emissions due to carbon leakage.

Economies like the UK are likely to find it easier to decarbonise compared to, for example, emerging and developing economies reliant on cheap and abundant energy to fuel economic development (including the need to significantly improve access to electricity) and fossil-rich countries reliant on the extractive sector for creating jobs and driving economic growth. Nevertheless, the UK has a key role to play in demonstrating the value of an effective, predictable, and whole-system policy approach to address climate change, at least cost and disruption to the economy in the near-term and to the benefit of the economy's long-term productive capacity. It also has a key role to play in driving low carbon technologies to commercialisation (e.g. through its support for CCS and low carbon fuels such as advanced biofuels and hydrogen), which has dual benefits for the UK energy transition as well as for decarbonisation efforts and energy transitions in other parts of the world.

As a result we believe that the UK should capitalise on this opportunity for leadership in the negotiations, but the UK should take a more granular and differentiated approach in calling for and supporting the low carbon energy transition in other parts of the world, recognizing the different energy-economy-environment priorities in different countries and regions. Cleaner burning fossil fuels like gas create optionality in the energy system, to begin reducing GHG emissions in the near-term and potentially as part of the low carbon solution in the longer-term. They have a critical role in meeting the growth and development imperative of non-OECD economies and in easing the transition to a low carbon economy in developed OECD economies while also getting the global economy on the path to decarbonisation. In the longer-term, UK support for low/no carbon technologies (including CCS and low carbon fuels such as advanced biofuels and hydrogen) is not just valuable from its domestic energy transition perspective but also as part of the suite of global technologies necessary to deliver net zero emissions by the end of the century.

The UK has a target to 2050, while the UNFCCC discussions are increasingly focused on the pathway beyond 2050 and up to 2100. The UK leadership in addressing climate change means that it may implement a greater proportion of carbon mitigation actions before 2050 than other countries. Some low carbon technologies will make their greatest impact globally in the post-2050 period, including CCS. The UK's support for improving CCS capabilities in non-OECD countries is welcome and should continue.

A key area of interest in international climate talks is how to mobilize $100bn to support low carbon development in non-OECD countries. The Climate Change Act does allow for units (allowances) from linked carbon markets to count towards UK goals. This approach is aligned with a least cost approach to meeting the goals of the UNFCCC, Many developing countries active in the UNFCCC negotiations support development of market mechanisms that encourage investment. The UK's approach should find ways to accommodate this interest. There are legitimate concerns about the use of "offsets" regarding double-counting and environmental integrity. However, the focus on domestic-only action should be reconsidered in light of the Paris climate negotiations and possible challenges in meeting the 4th carbon budget while remaining internationally competitive.

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 gCO_2/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:

In order to meet the emissions reduction budget to 2032 to prepare for the 2050 target, Shell recognises that the primary source of decarbonisation for the UK will come from the power sector where there are immediate opportunities to decarbonise through coal to gas switching and in the longer-term through the deployment of low carbon technologies such as carbon capture and storage. It will be important to ensure through the period, there is a clear pathway and policy framework for all sectors so that the UK's decarbonisation pathway beyond 2032, to 2050, is prepared for, cost effective and efficient. This could include, for example, a policy framework that supports a mosaic approach to decarbonising the transport sector where there is coordinated action by all parties: vehicle manufacturers, fuel producers, fuel retailers, and consumers. Shell therefore recommends that policy-makers take a number of steps:

- consider carefully, using all available evidence, the required pace of technological development across all sectors required to achieve the budget and eventual 2050 target and assess the impacts decarbonisation would have on industry and consumers in each of those scenarios;
- take a least-cost approach to determining the necessary level of support for low carbon demonstration (e.g. for renewables, nuclear, gas, CCS in the power sector, advanced biofuels or other alternative sources in transport), with a view to support being withdrawn when commercial viability is attained;
- ensure any additional specific targets that the UK introduces (such as the

proposed 2030 decarbonisation target for the power sector), does not distort the EU energy and carbon markets, hinder competitiveness for businesses/industry or create unnecessary cost burdens for consumers and industry;

- draw on the experience of industry and developers (such as Shell in the context of the Peterhead CCS project) in formulating policies to support and cost effectively deliver power sector decarbonisation in the 2030s and beyond; and
- provide a clear, coherent and stable policy environment which stimulates investment in low carbon technology.

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:

Shell believes all users of energy have a role to play in supporting the UK deliver an efficient and least cost energy transition and decarbonisation pathway to its climate change targets to 2032 and beyond.

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:

Shell believes the most effective way to decarbonise to achieve the UK's 2050 target is to undertake a least cost approach. Some of the least cost options that could be used to achieve the 2032 budget include, in the power sector, coal to gas switching and in the domestic residential sector, switching to more efficient gas boilers and low cost efficiency measures such as insulation. Crucial to ensuring the UK's decarbonisation pathway to 2050 is efficient and effective is not delaying the development and deployment of low carbon technologies through R&D, grants and other support mechanisms. CCS, for example, has been estimated, by the Energy Technologies Institute, to save the UK £32bn per year by 2050 compared to if it is

not deployed to achieve the UK 2050 target. Therefore, provided that the UK Government provides the necessary policy support and the right conditions for investment in material low carbon technologies prior to 2032, the technology cost curve shows that costs could be significant lower for these technologies in the long-term.

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:

Coal to gas switching could provide an immediate reduction in the UK's greenhouse gas emissions from the power sector and this would close the policy gap in a cost effective manner up to the fourth carbon budget. Continued burn of unabated coal in the power sector, alongside policies that support its continued presence - such as participation in the Capacity Market or the freezing of the Carbon Price Support, has undermined the investment case for much cleaner, more efficient and cheap gas CCGTs, of which up to 26GW is required by 2030, and in some case 9GW in this decade, according to the Government's Gas Generation strategy in 2012[1]. Shell believes that policy-makers should deliver policies to enable coal-gas switching and the necessary investment in gas generation, by 2020.

Policies also need to support low carbon technology and infrastructure by providing commercial incentives to invest in these areas where the market does not deliver those incentives; for example, to invest in CCS and low carbon fuels such as advanced biofuels and hydrogen. To be effective in encouraging and directing investment, such policies need to be sustained and maintained over time and clarity over the future direction of policy is essential. For example, whilst the current CCS Demonstration Programme, in which Shell is participating through the Peterhead CCS Project, is a key step to developing large-scale CCS in the power sector, further support to enable investment in follow on CCS projects will be essential to ensuring the UK can meet its decarbonisation targets at least cost. Clarity on the policy framework for CCS and its allocation of support within the Levy Control Framework, to and beyond 2020, is essential.

Policies to manage the transition and close the 4th carbon budget gap also need to minimise any near-term competitive impacts, allowing businesses time to adjust and play a constructive part in the energy transition. Carbon markets provide the most flexible, and hence least cost, way for businesses and the economy to decarbonise. An economy-wide carbon price has the advantage of driving the lowest cost emissions reductions first while also minimising compliance costs and

[1] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65654/7165-gas-generation-strategy.pdf

fostering innovation. The EU ETS (once reformed, including through the implementation of the Market Stability Reserve) has the potential to provide the required price signal to drive cost effective decarbonisation in line with the EU 2030 target. In the near to mid-term we not believe that the EU ETS price will be high enough to support investments in CCS or low carbon transport technologies. Therefore time limited complementary polices will be needed to drive development and adoption of these technologies.

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: Energy is clearly a significant component of the spending outlined in the National Infrastructure Plan 2014 (£274.9 billion out of a total pipeline of £466 billion) with £25.7 billion in 2015-16 alone. Of this investment pipeline UK Continental Shelf produced gas clearly remains a significant resource to continue to provide the UK with efficient, economic and secure supplies for many years, provided an attractive fiscal regime is in place. Coupled with the investments in gas import infrastructure, which has increased significantly in recent years allowing the UK to import secure supplies of gas by pipeline or ship, these investments allow gas to play a significant role in efficiently decarbonising the UK power sector into the 2030s.

The NIP also sets out key investments in low carbon energies which can take the UK to its 2050 decarbonisation target and as such should be supported up to the point of commercialisation. The UK's commitment to supporting low carbon technologies, in particular CCS, can make an important contribution in ensuring the technology is developed to a commercial scale helping to make it available at a global scale for other countries to adopt in reducing global emissions, although the current pipeline of CCS projects is insufficient to enable CCS to contribute to emission reductions in a cost effective way as desired (see answer to Question 8).

Ensuring that policy drivers, such as innovation funding and establishing robust carbon markets, are included within international considerations is an important step in maximising the potential CCS can deliver to least cost emission reductions at a global scale. This is a position supported by the IPCC's 5th Assessment Report assessment that without CCS global mitigation costs will be 138% higher by 2100.

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:

In the UK Shell operates more than 30 North Sea oil and gas platforms, three onshore gas plants as well as related infrastructure, and supplies fuel to consumers through 1,000 plus Shell-branded petrol stations as well as to airports around the UK. In addition Shell has office locations across several locations in the UK.

As such, carbon budgets, and in particular their implementation through a range of policy measures such as the EU ETS, CRC, Carbon Price Support and CCL all impact upon the cost and competitiveness of our UK operations and the decisions that we make as a business. Overlapping policy measures both add to the cost of decarbonisation and undermine the EU ETS which we believe should be the principal driver of decarbonisation in Europe.

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:

Shell operates in over 70 countries around the world. The fiscal and regulatory burden differ across the countries in which we operate, but where costs are high,

including through costs related to decarbonisation, this impacts directly on the competitiveness of Shell's operations. The high degree of uncertainty in the policy environment in some countries, as well as temporal differentiation, creates a more challenging investment environment. As such our approach to decarbonisation has been to support global carbon pricing that helps to set a level playing field through consistent decarbonisation policies within regions, such as the EU ETS, and between different countries and regions. Such an approach would avoid unintended consequences of creating carbon leakage within and between regions and countries that can significantly impact upon economic and industrial competitiveness.

The carbon budgets process and the setting of a long-term goal through the Climate Change Act is a pragmatic approach that gives long-term visibility for the UK's decarbonisation ambitions. However, the UK's approach to implement its carbon budgets has presented challenges for industry through introducing overlapping policies (such as the Carbon Price Support mechanism) that have distorted the central plank of EU energy policy, the EU ETS, and presented cost challenges for energy users. However, the UK's support for CCS demonstration presents opportunities to export its skills and expertise to the EU and globally. This support for CCS to enable the commercialisation of CCS must be maintained as it presents a significant opportunity for the UK to benefit from this new technology, by reducing the costs of decarbonisation significantly over time and creating a new industry.

Similarly, the carbon budgets present an opportunity to establish a broad policy framework to prepare the transport sector for decarbonisation as well. Large scale decarbonisation is unlikely to be needed within the 5th Carbon Budget, but long lead times, particularly for infrastructure, present a rationale to consider what preparations are needed before the 2030s. The UK Government should consider phased support for a range of pre-commercial low carbon technologies that enable a mosaic approach to transport and consider infrastructure needs in parallel. The UK should pragmatically apply implementation of EU regulations, such as the EU Fuel Quality Directive, so as not to impose ineffective standards on suppliers without the necessary capability and capacity.

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

ANSWER:

Shell believes that an economy-wide and market-based approach to decarbonisation that delivers the most cost effective outcome is the most important characteristic of an effective carbon budget. Proportionate and appropriate action should be taken in each sector of a given economy and at a pace which is commensurate with affordability, energy security, and the availability of low carbon technology. Within a

given sector, action may be needed in a number of sub-sectoral areas; for example, in the road transport sector, which faces particular decarbonisation challenges, action is needed not only in lowering the carbon intensity of fuels but also in improvements in vehicle efficiency, infrastructure, and user behaviour. Action in one area but neglect in another will make the decarbonisation challenge harder to meet and the cost to society higher. Shell believes that market-based mechanisms, such as emissions trading schemes, will be effective policy drivers to advance decarbonisation, but given the differing pace in technology availability to different sectors, additional policy measures may be required in the interim to stimulate investment.

The basis for carbon budgets should be evidence based and draw from international data (such as IPCC) as well as industry or sector specific data. Whilst implementation should then allow for flexibility in terms of technology and policy mechanisms, we believe it is essential that once set, carbon budgets are not subject to constant review that would create unnecessary uncertainty for businesses.

Market-based mechanisms and proportionate and appropriate action will ensure optionality is retained within the decarbonisation pathway. This is crucial to, for example, enable gas in power to provide a cost efficient route to reducing emissions in the near term, through coal to gas switching, and with CCS in the long-term. Pursuing both a least cost approach to decarbonisation now and optionality in bringing on stream new technologies once they become economic, allows for near term least cost emissions reductions whilst supporting new low carbon technologies to meet future emissions targets.

An effective carbon budget would enable phased support for pre-commercial technologies, only to a point where they become commercial in scale and then subject to the same competitive, level playing field, as other technologies and where appropriate a mix of technologies should be supported. For example, in the transport sector the UK should also consider phased support for a range of pre-commercial low carbon technologies, including advanced biofuels and hydrogen, until viable options are apparent. A similar phased approach is important in decarbonizing heat by both sending long-term policy signals and allowing enough time to develop the necessary technologies and infrastructures.

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:

The UK's decarbonisation pathway and carbon budgets, including the 5th Carbon Budget, should be in balance with the need to retain security of supply and affordability for consumers, industry and the public purse. As such we believe that the UK should continue to take into account developments in international negotiations and regulations as well as evolutions in technology to avoid being significantly out of step with international and EU targets and pathways. This will ensure the UK remains competitiveness for the UK globally, through avoiding emissions leakage from the UK to the EU or elsewhere that would limit the UK's meaningfully contribution to global emissions reductions, whilst avoiding significant costs being imposed on UK consumers and industry.

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: No response.

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

ANSWER: No response.

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