



RSPB's response to Bright Blue's call for evidence on home energy efficiency (May 2016)

The RSPB welcomes Bright Blue's invitation to submit written evidence on home energy efficiency and the domestic heat sector, and provides below the RSPB's views on this policy issue. With over 1.1 million members, the RSPB is one of the UK's leading nature conservation organisations.

Climate change is one of the greatest long-term threats to wildlife. One in six species is at risk of extinction by 2100 under business as usual scenarios. The RSPB's work on the impacts of climate change on wildlife (see our recent [science review](#)¹), highlights the fact that we are already seeing significant impacts. Future projections clearly show us that, overall, wildlife will face a much tougher environment, and big challenges, as a result of changing climate. Two other recent reports with similar findings are Living With Environmental Change's [Biodiversity Climate Change Impacts Report Card 2015](#)², focusing on UK biodiversity, and BirdLife International's [The Messengers](#)³, which looks at birds at the global scale. All this highlights a pressing need to sustainably reduce our greenhouse gas emissions to avoid levels of climate change that seriously affect wildlife.

An urgent transition to a low carbon economy is therefore required and we must ensure that this transition is in harmony with nature. Our new report [The RSPB's 2050 Energy Vision](#)⁴ (published 24 May 2016) highlights that demand reduction is a critical part of this transition as it will ensure that energy is affordable in the future and help us to avoid significant ecological impacts. Demand reduction not only reduces overall energy requirements and potential emissions but can also help to reduce infrastructure requirements and therefore pressures on the natural environment.

The current policy landscape around energy efficiency is, as Bright Blue have identified, severely lacking in appropriate support measures. As part of the Paris agreement, the UK Government has signed up to keeping the increase in global average temperature to well below 2°C above pre-industrial levels, and an aim to limit the increase to 1.5°C. To have a chance of keeping to our commitments under this agreement, as well as meeting the EU and UK 2030 (and 2050) targets, the demand reduction policy vacuum in the UK must be filled as soon as possible. Critically, what replaces the Green Deal will need to provide a stable policy framework that signals the government's commitment to this agenda, thus fostering industry and public confidence in the direction of travel.

Meeting the UK's 2050 target and interim carbon budget targets in harmony with nature will require major changes to the UK's energy system, which includes dramatically reducing our overall energy demand. We urge the UK government and devolved administrations to act now to take on the ambitious challenge to eliminate energy waste in this country.

¹ http://www.rspb.org.uk/Images/natureofclimatechange_tcm9-409709.pdf

² <http://www.nerc.ac.uk/research/partnerships/lwec/products/report-cards/biodiversity/>

³ <http://climatechange.birdlife.org/>

⁴ <http://www.rspb.org.uk/energyfutures>

Specific points in response to some of the questions posed in the call for evidence are provided below.

Question 3

We consider that the UK government should designate energy efficiency as a National Infrastructure Priority and implement ambitious energy efficiency policies that rapidly deliver the large-scale carbon savings needed to achieve this, including a major programme of retrofitting home insulation. We consider that subsidies would likely have a role to play in a suite of policies on this issue. It is recognised that the measures which provide the greatest carbon savings are often the most expensive and most disruptive to install and therefore less attractive to homeowners. Substantial government support in this area would provide a clear signal that this is something the government support and wants to happen.

Question 6

We believe that any new policies aimed at decarbonising the domestic heat sector should prioritise conversion to electrical heating systems (solar thermal, ground source heat pumps, water source heat pumps etc) over bioenergy-based technologies. Any use of limited bioenergy resources should be targeted at the hardest to decarbonise sectors including industrial heat and transport.

Scientific evidence makes it clear that biomass feedstocks deliver different levels of carbon savings. This is based on a range of factors, including direct and indirect land use change and the counter-factual of what the feedstock or land would otherwise have been used for. Crop-based feedstocks can result in small emissions savings compared to other kinds of feedstocks or in some cases even emissions increases due to indirect land use change. Woody biomass can, in some cases, result in substantial emissions increases relative to fossil fuels.

Bioenergy can play a limited role in decarbonising the sector so we do not propose it should be excluded. However, we consider that in order to guarantee maximum carbon abatement, full carbon accounting and rigorous sustainability criteria need to underlie any use of bioenergy. Subsidy and policy should prioritise the most sustainable kinds of feedstocks, namely genuine wastes and residues, limited woody energy crops, arisings from ecological management of nature reserves, and the sensitive use of woodfuel from currently undermanaged UK broadleaf woodlands. The RSPB does not consider the current sustainability criteria within the Renewable Heat Incentive (RHI) scheme, in particular those for woody feedstocks, to be sufficiently rigorous to protect the natural environment.

The assumption of carbon neutrality for bioenergy, that persists in UK policy and subsidy regimes, needs to be corrected as it has been shown by overwhelming scientific evidence (including a study by DECC⁵) to be fundamentally flawed. Further detail of this evidence can be provided on request.

Question 7

In the heat sector, measures are needed to speed up the transition to low carbon technologies such as heat pumps, including incentives, regulations and awareness-raising. Support mechanisms such as the Renewable heat Incentive (RHI) are important in the short term to stimulate the uptake of low carbon heat technologies.

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The UK government and Devolved Administrations could also consider introducing legislations such as a Warm Homes Act, setting statutory targets for renewable heat uptake and energy performance of buildings. This would encourage progress and provide long-term direction and certainty to industry.

This response is submitted on behalf of the Royal Society for the Protection of Birds (RSPB). The RSPB is the country's largest nature conservation charity with over a million members. Together with our partners, we protect threatened birds and wildlife so our towns, coast and countryside will teem with life once again. We also play a leading role in BirdLife International, a worldwide partnership of nature conservation organisations.

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