

Written evidence submitted by OVO Energy (TPW0060)

OVO launched our ten-year strategy, Plan Zero in 2019. Our Plan outlines our commitments to reaching net zero emissions across our own operations by 2030, helping our customers halve their total lifestyle carbon emissions and eliminating their home energy emissions by 2030. Nature based climate solutions are a critical part of our and the Government's plans to reach net zero, and as a business, we've planted 1 million trees since 2015. Over the next year we're working with partner organisations to plant around 900,000 more.

1) Are the UK Government's targets for increasing forestry coverage, and tree planting, for England and the UK sufficiently ambitious and realistic?

While we are enthusiastic about the Government's commitment to planting 30,000ha of tree cover, equivalent to 90-120m trees, per year, 30,000ha of tree planting per year is the lower end of the range indicated in the CCC's recommendation. It represents a minimum level of tree planting that science tells us is required to reach net zero emissions by 2050. Without supporting this commitment through binding legislation, efforts could fall short of this essential planting. Given this recommendation is considered realistic and deliverable by the CCC it should be enshrined in law.

With COP26 on the horizon, the UK's net zero commitments require us to be ambitious on tree planting. Nature based solutions are a key part of the UK's COP26 Presidency - safeguarding ecosystems, protecting natural habitats and keeping carbon out of the atmosphere. To do this properly, we need legally binding targets to demonstrate our dedication and mobilise the resource needed to meet our goals.

England missed its tree planting targets by 71% in the year to March 2019. Making our tree planting commitment legally binding and working with devolved national governments to set binding targets that reflect the scale of ambition required in each UK nation would spur action and mobilise the investment needed to expand and protect our woodlands.

2) Are the right structures in place to ensure that the UK wide target for increasing forestry coverage is delivered?

Since launching Plan Zero, OVO's response to the climate crisis and strategy to drive progress to zero carbon living, we've invested in tree planting and woodland schemes as a natural climate solution.

We've partnered with tree planting organisations to boost tree-planting numbers through community tree pack schemes (which result in trees being planted across urban, peri-urban and rural locations), but any carbon savings resulting from these schemes are not eligible to be verified to Woodland Carbon Code standards and are therefore going unrecognised in the calculation of our organisational carbon footprint and offsets. We think this is a structural obstacle to mobilising private investment in nature and natural climate solutions.

By making verified carbon accounting more accessible to a wider range of tree-planting activities, the Government would have a better understanding of the contribution private investment is making to the UK's tree planting/emissions reduction efforts, and could more effectively mobilise private sector's support to reduce emissions in a democratised, decentralised and affordable way. We welcome the establishment of the Taskforce on Scaling Voluntary Carbon Markets (TSVCM), whose review should include expanding the market mechanisms that enable businesses like OVO to invest in nature-based

solutions projects that remove carbon dioxide from the atmosphere (including those in the UK) and account for these carbon removals in relation to organisational net zero emissions targets.

3) How effective is the co-ordination between the four nations on forestry issues, including biosecurity, plant health and other cross-border issues?

4) Why were previous ambitions for increasing tree planting in England not met and what lessons should be learned?

Though the differing success rates of devolved governments are partly attributable to the attractiveness of the land available in England for tree planting, real success would rest on a well thought out England Tree Planting strategy that introduces change to policy and incentives to make tree planting more attractive to landowners.

Farmers in England face complex choices over tree-planting, because they get little support for it owing to the way the government has implemented the provision of finance. Forests are currently supported with grants to cover their startup costs, after which landowners will not see a payout for decades.

There should be clearer processes for those applying for grants for tree planting and a simplification of the accreditation process to locate land for new forestry. We welcome the announcement made by the Secretary of State for Environment, Food and Rural Affairs regarding changes to farming finance and the special consideration paid to agricultural subsidies and how tree planting can be made more attractive. The Environmental Land Management scheme should be implemented in a way that incentivises new woodland and we look forward to further detail being released as the Government consults to finalise the design and operation of the future system in 2021.

5) In relation to increasing forestry coverage in England, what should the Government be trying to achieve? For example, how should the following policy objectives be prioritised?

- **Mitigating or adapting to climate change;**
- **Promoting biodiversity and nature recovery;**
- **Increasing biosecurity and plant health;**
- **Improving human well-being and health;**
- **Protecting natural and cultural heritage;**
- **Food security;**
- **Creating commercial opportunities from forestry, tourism and recreation; and**
- **Any other priorities?**

The Government should be prioritising mitigating climate change and promoting biodiversity and nature recovery. We do not consider these to be mutually exclusive with creating commercial opportunities from forestry, tourism and recreation. Indeed, they should be seen as entirely complementary and policies should be implemented to ensure that the full range of benefits are realised.

As a private sector business that does not specialise in forestry, OVO wants confidence that schemes or projects set up to increase forestry coverage in England are doing so in line with sustainable best practice, planned in a way that has holistically considered all policy objectives outlined in this question. This could be achieved, for example, through certification, standards or assurances that forestry or tree-planting schemes have been developed in line with 'right tree in the right place' principles, to codes of

practice such as the Urban Tree Manual or the UK Forestry Standard. This would provide confidence to businesses that they are not inadvertently investing in projects that could create more harm than good - for example projects that drain carbon-rich peatlands, create monocultures that degrade biodiversity or divert land from alternative uses of higher economic value.

As has been noted by Carbon Brief, afforestation since the 1980s has been carried out by the private sector. When delivered responsibly and strategically, levers that create commercial opportunity in tree planting can create a store for carbon to help remove excess CO₂ from the atmosphere, and generate the material we'll need to decarbonise the construction and manufacturing sectors. Furthermore, it has been shown that schemes can successfully coexist with leisure activity and job creation in sectors adjacent to forestry. The partnership between Go Ape and the Forestry Commission is an excellent example of this.

To prevent the natural flow of CO₂ back to the environment at the point trees die, careful consideration should be given to encouraging the development of a sustainable timber sector that replaces non-wood alternatives in construction and manufacturing.

As the UK is a net importer of forest products, the Government should look to better commercialise forest production to generate jobs, capture carbon in the UK and displace emissions caused by import. The inter-relation with other government policy becomes apparent, for example as new build standards can be used to drive up the use of timber frame buildings.

To facilitate such commercialisation it's critical the investment is made in sector infrastructure and workforce.

We welcome the announcement of the Farming Investment Fund which should be used to deploy innovative practices and technologies across the forest management sector. Alongside increased infrastructure investment, there should be greater attention and effort paid to growing the horticulture workforce. The Government should work with sector leaders to promote horticulture as a highly skilled and desirable industry to enter, through encouraging the inclusion of horticulture within the national curriculum in areas such as science and technology, and providing more high-quality horticulture advice through the National Careers Service.

The Government should adequately fund FE training in horticulture to ensure the consistent delivery of high-quality further education training that meets the needs of ornamental horticulture. As has been recommended by the APPG for Gardening and Horticulture

6) Are the right policies and funding in place to appropriately protect and manage existing woodlands in England? How will prospective changes to policy and legislation affect this?

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