

UK Manifesto: General Election 2024

Taking a stand for a healthier, greener tomorrow.

Introduction

The next UK Parliament will be a turning point for the environment, people's health, and the future of our green economy in the UK. This manifesto presents a vision for the future that aligns with the long-termist approach that politicians from across the political divide have already committed to in legislation, but must now deliver in practice. Through small changes to existing legislation, impactful new Bills, and further protections to the rule of law, the next Government can ensure not only a reduction in our greenhouse gas emissions aligned with the Paris Agreement, but also save the NHS resources thanks to cleaner air and healthier environments, support to local communities and the people and nature living in them, as well as restoring a sense of pride in our environment that we have risked losing recent years.

ClientEarth wants a British energy system that meets the country's energy security needs, whilst not exceeding environmental and social limits or negatively impacting the wellbeing of people and communities. We want a British food system that provides safe, nutritious and sustainable food through innovative agroecology practices, as well as resilient and traceable value chains that limit global deforestation and environmental degradation. We want to see a restoration of wildlife and habitats, land and sea, which is protected by a robust governance system that is fair and transparent, with the effective management of land and ocean use, and the protection of people's rights. We want a transport system that meets the needs and guarantees the health of everyone, without negatively impacting on the natural environment.

In 2021 the UK welcomed governments, businesses, NGOs and other stakeholders to the international climate summit COP26 in Glasgow. After two weeks of intense negotiations, almost 200 countries signed up to the Glasgow Climate Pact, an outcome which builds on targets set out in the Paris Agreement, the international legally-binding treaty that aims to limit global warming to 1.5 degrees Celsius compared to pre-industrial levels. In 2022 the Government launched [an independent review](#) of the it's approach to delivering its net zero target, which produced 150 recommendations that support delivering net zero without placing undue burdens on businesses or consumers and maximises the economic opportunities of the ongoing transition.

There has, however, been growing concerns that national policy decisions increasingly pose a risk to the UK's global climate leadership and undermines its reputation and credibility when pushing for an international sustainable transition. The independent Climate Change Committee's [2023 Progress Report](#) to Parliament on emissions reduction outlines multiple ways that the UK is now failing to deliver on policies and targets it has already committed to, with particular concern on the Government's recent approval for new fossil fuel extraction in an effort to boost domestic hydrocarbon output. The energy and cost of living crises have sent shockwaves through European and international economies, but the UK has not been as proactive in developing new environmentally-friendly policies as other key jurisdictions, and has in recent years lowered its environmental ambitions and even regressed in certain areas.

ClientEarth believes that delays in taking the right legislative steps to tackle climate change and protect the environment poses serious threats to long-term economic recovery, security of our food and energy systems, and threatens the loss of critical wildlife and habitats that we depend on. ClientEarth believes that law is fundamental to how society is organised and it is one of the most effective levers for sustained, intra-generational transformation. We need to transform entire industries and economies - and to do that at the scale and speed required we need the law to set new standards and drive the transformation. We need to strengthen the entire system of rule of law: from how laws are written, to how they are applied and how they are interpreted and enforced by courts and regulators, to ensure that the people and communities most affected by environmental degradation can protect their fundamental rights.

With the upcoming general election, political parties have a vital opportunity to put environmental protections at the heart of UK legislation. Doing so will deliver benefits to health and nature for local communities and the people and wildlife living in them, help to alleviate the pressures on our NHS from pollution, and usher in an era of green jobs, industry, investment and innovation across all parts of the UK, as we transition to net zero by 2050. In this manifesto, we hope to encourage the next government to move away from vague policy promises, and use robust legislation to effect systemic leadership and change for the UK and the world beyond.

Sections

ClientEarth has proposed manifesto asks that focus on delivering the transformational change needed across four groups of human-created systems; in summary, they are:

Legal systems and rule of law

1. An Environmental Rights Bill

Economic systems

2. Delivering on the UK's commitment to become the world's first net zero-aligned financial centre
3. Transparent and sustainable value chains
4. Fossil fuel influence holding back transition

Energy systems

5. Reaching net zero
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7. Robust clean air laws that put people's health first
8. Finally addressing the toxic legacy of the Dieselgate scandal
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Food, ocean and land use

10. Keeping to our 30x30 Commitments
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Legal systems and rule of law

At the centre of the UK Government's responsibilities are providing the framework for the nation's legal systems, the rule of law, and the justice on which our society functions. Legislation that is passed, and those laws that govern us, is fundamental to how our society is organised. Our legal system is one of the most effective levers for sustained, intra-generational transformation across our economy, communities, and nature which should thrive in them.

We believe that the UK Government must take steps to strengthen its entire system of rule of law – from how laws are written, to how they are applied and how they are interpreted and enforced by courts and regulators. We believe that the people and communities most affected by environmental degradation must be able to protect their fundamental rights. And we support steps to create, improve and defend local, national, regional and international legal frameworks that allow people, prosecutors and civil society organisations, like ClientEarth, to access the information they need to advocate for change, participate in environmental decision-making, and go to court where laws are broken.

1. An Environmental Rights Bill

Our Ask: For the UK to be brought into compliance with its international obligations under the Aarhus Convention by enshrining into legislation the right to a healthy environment, and ensuring that access to environmental justice is not prohibitively expensive.

In 2005 the UK ratified the UN's Aarhus Convention, a multilateral environmental agreement that grants the public rights regarding access to information, access to justice, and public participation in governmental decision-making processes, in relation to environmental matters. In addition, the Aarhus Convention contains a core recognition of the importance of the right to a healthy environment.

Although ratified, the UK has never passed legislation to meaningfully comply with the Convention. ClientEarth believes that, by introducing a dedicated Environmental Rights Bill, the UK can enshrine, for everyone, the right to a clean, healthy and sustainable environment and provide the necessary means to protect and enforce this right. In doing so, the UK would align its global aspirations and commitments with concrete domestic measures. [Fully incorporating Aarhus into UK domestic law](#) would help people access environmental information, participate in decision-making and allow everyone access to justice, including the ability to take legal action on environmental matters without risking huge personal costs, known as the 'right to challenge'.

The Bill should:

- Establish the right to a healthy environment for everyone;
- Require public bodies to act in accordance with that right in their decision making;
- Fully implement the Aarhus Convention, including the right of access to justice, to give people the tools they need to challenge public bodies who infringe their right to a healthy environment.

A thriving environment contributes to people's improved well-being, greater happiness, and enhanced prosperity. It fosters a sense of community pride and a stronger bond with nature.

"The Environmental Rights Bill would help people to take legal action over toxic air, polluted water and depleted nature in their communities at a time where environmental rights are under serious threat in the UK."

Angus Eames, UK Lawyer

Economic systems

At ClientEarth, we believe that reforming corporate, consumer and financial laws is needed to drive transformational change in business and investment, so that sustainability is at the heart of corporate decision-making.

This means that laws should properly incentivise corporates to reduce their greenhouse gas emissions, protect the environment and respect human rights. Financial regulation should stop money flowing into industries that contribute to climate change and environmental degradation, and instead direct it towards climate and environmentally positive activities. And the law must also hold companies accountable for their negative impacts on the environment and human rights.

These legal reforms are needed for the UK Government to meet its international commitments on climate and biodiversity, but it is also an economic imperative: the UK must take advantage of the opportunities afforded by the transition to a net zero economy to create new jobs in green industries, cement its place as the world-leading hub for green finance, and ensure that its markets are insulated from the financial risks of unsustainable business practices.

2. Delivering on the UK's commitment to become the world's first net zero-aligned financial centre

Our Ask: Clarify legal duties of investors to require them to minimise the adverse environmental and human rights impacts of their investments (for example, by advocating for sustainable practices in their investee companies).

Institutional investors have substantial influence over the companies they invest in, through asset allocation, shareholder voting at AGMs, and direct engagement with companies (referred to as 'investor stewardship'). But investors are not doing enough to ensure that investee companies address - and mitigate - their environmental and human rights risks and impacts.

ClientEarth believes the legal duties of financial institutions must be reformed, so that they are expressly required to use their influence to support investee companies making smart choices to reduce their environmental impact, support a just transition to net zero and generate sustainable long-term value.

Our Ask: The UK Green Taxonomy must be genuinely science-based, and not classify fossil gas as environmentally sustainable.

The Government has committed to introducing a UK Green Taxonomy that will define which economic activities are classified as 'green', and is expected to consult on proposals in Autumn 2023. If this Green Taxonomy is well designed and accurately identifies activities that are genuinely sustainable according to the best available science, then it can be a vital tool to boost sustainable investment in the UK by giving financial markets the information they need to direct financial flows towards sustainable activities which support the transition to net zero.

Of paramount importance is that the taxonomy must not classify any activities based on fossil gas as environmentally sustainable or as supporting the transition. Doing so would undermine the purpose of the regime by actively incentivising investment in activities that are inconsistent with science-based pathways to net zero, and allow the regime to be used as a vehicle for greenwashing by fossil fuel companies and their financiers. The EU's Taxonomy is currently the subject of legal action in Europe (brought by ClientEarth and others) for classifying certain fossil gas activities as sustainable.

Our Ask: Require companies to adopt 'transition plans' for reducing their emissions in line with the UK's climate commitments.

At COP26, the UK Government committed to requiring public companies and financial institutions to publish 'transition plans' that detail the steps they will take to decarbonise their businesses and investment portfolios, as the UK transitions to a net zero economy. This was the Government's key policy towards achieving its goal for the UK to become a net zero-aligned financial centre.

ClientEarth strongly supports making transition plans mandatory for corporates. But introducing mandatory transition plans will only be effective if the law sets clear standards for those plans, which ensure they are credible and contribute towards achieving net zero. At a minimum, companies' transition plans must show that they will decarbonise their business in line with national and global climate targets, without relying on carbon offsets, and must be consistent with climate science (including phase out timelines for carbon-intensive sectors such as fossil fuels). The Transition Plan Taskforce (established by HM Treasury) is currently developing standards for the content of transition plans, but current draft standards would allow companies to set weak plans that would not reduce the company's emissions in line with UK climate goals.

In addition, the legal framework must ensure that there are proper checks on companies' transition plans. Plans must be subject to effective audit and assurance processes, and companies must be accountable to regulators (and face sanction) when their plans are inadequate or are not implemented.

Getting transition plan regulation right is crucial. The UK's ability to transition to a sustainable, low-carbon economy is dependent on individual companies taking action to decarbonise their businesses, and mandating adequate corporate transition plans will ensure that UK markets fully take advantage of the opportunities of the transition and avoid the risks.

Current laws are failing. Corporate law requires directors to protect the long-term best interests of their company, which can only be achieved by adopting effective climate transition plans. Recent regulation on climate-related disclosures also encourages public companies and financial institutions to disclose transition plans, but without express requirements to reduce emissions in line with climate goals. Yet an increasing number of companies are making unsubstantiated claims to be net zero-aligned which are misleading consumers and financial markets. Clear universal standards for transition plans are needed to remedy this.

The Government must work with the Financial Conduct Authority to ensure that mandatory transition plans rules are effective and support achieving Government ambition on net zero. These rules must be introduced as soon as possible. Despite the urgent need for climate action in this critical decade, the timeline for making transition plans mandatory has slipped since the Government's COP26 announcement two years ago. This delay only increases the chance that the UK economy will fail to meet the Government's emissions targets and increases the financial risks from companies continuing with unsustainable business models.

"UK business and the financial sector are dragging their feet on climate action at the very moment they need to be pouring their resources into backing both the net zero transition and nature protection.

Mandatory and legally enforceable transition plans would be one of the most effective ways to drive immediate change and would provide an accountability lever to pull if any company or financial institution fails to prepare for transition or manage its climate or nature related risk."

Dan Eziefula, Accountable Finance Lawyer

3. Transparent and sustainable value chains

Our Ask: The Government legislates to ensure that all companies and financial institutions operating in the UK conduct due diligence to prevent, identify and mitigate adverse environmental and human rights impacts across their business and investment activities.

Many supply chains that feed the UK economy (such as supplies of mining, logging, agriculture and sea-food/aquaculture products) cause severe environmental degradation and contribute to climate change. The global food system, for example, is one of the primary causes of biodiversity loss and contributes to climate change, due to deforestation and ecosystem conversion, pollution, over-exploitation of plant and animal species and the spread of alien species that damage local ecosystems.

The UK's legal framework fails to ensure that companies and financial institutions address these adverse impacts in their value chains. In the EU, due diligence will be regulated by a cross-sectoral due diligence law, the Corporate Sustainability Due Diligence Directive, which draws on the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

While still under negotiations, this future directive will require companies operating in the EU market to conduct human rights and environmental due diligence encompassing their own operations, those of their subsidiaries, and business relationships across their value chain. ClientEarth believes that companies and financial institutions operating in the UK should be required to conduct environmental and human rights due diligence to identify, prevent and mitigate the harms linked to their value chains and the activities they finance, and also publicly report the outcomes of this due diligence.

Our Ask: The Government to improve non-financial disclosure regulation to ensure that companies and financial institutions disclose information about the environmental, climate and human rights impacts of their activities and investments.

Requiring companies and financial institutions to report on their environmental, climate and human rights impacts is an essential part of ensuring that they factor these impacts into their decision-making and accurately disclose the risks associated with their business activities to investors. It is also vital in terms of holding these actors accountable for harm they may cause.

Beyond receiving cross-party support in both Houses of Parliament, there is also widespread public approval for implementing fresh regulations on financial institutions concerning deforestation in particular. In 2021, a survey conducted by Global Witness revealed that two-thirds of the British public were in favour of enacting new legislation to prevent the financing of deforestation. Additionally, [Make My Money Matter found that around 77% of UK savers were unhappy with the idea of their pensions contributing to deforestation and the destruction of habitats.](#)

"The international legal landscape is moving quickly, and without taking steps, the UK risks being left behind. Governments, regulators, the financial sector, and consumers are all waking up to companies' role in the destruction of nature and the need to legislate to prevent and reverse this."

Laura Dowley, Accountable Corporations Lawyer

4. Fossil fuel influence holding back transition

Our Ask: A ban on fossil fuel advertising and the use of 'offsetting'

It's never been more urgent for companies everywhere to be more sustainable, and yet some companies with significant responsibility for climate change and environmental damage mislead the public about their sustainability through so-called 'green' advertising.

In a recent report, the Intergovernmental Panel on Climate Change (IPCC) concluded that corporations have attempted to derail climate action by targeted lobbying, doubt-inducing media strategies and through corporate advertising and brand building to deflect corporate responsibility to individuals.

Across the UK and the world, some of the most highly emitting corporations and sectors continue to add a green veneer to their business activities, promoted via advertisements and sponsorships. This advertising can have a stifling effect on authentic transitions, interfering with the free flow of market information, sowing disinformation and providing corporate polluters with a false social licence to continue with their harmful activities.

In an attempt to preserve their existing environmentally-damaging business models, influential companies within the fossil fuel sector rely heavily on public campaigns and policy advocacy that holds back the transition to net zero, obstructing the take-up of cheaper, more secure forms of energy and rigging the market in their favour. This corporate greenwashing causes significant delay and confusion for consumers, and ultimately hinders the UK from achieving legally binding emissions targets.

The UK has taken effective action on tackling the advertising and consumer protections around tobacco, which has led to significant individual and societal benefits. To complement an effective net zero public engagement strategy, a similarly effective regulatory approach is now urgently needed to provide effective restrictions on fossil fuel advertising, extending to sponsorship and policy engagement, facilitating decarbonisation and public health protection by addressing the risks that vested fossil fuel interests bring, including greenwashing.

ClientEarth believes that an orderly and efficient transition requires regulation to ensure markets operate to their full potential and to address the insidious problems of carbon lock-in. Included in this regulation should be a ban on 'offsetting' claims and similar terms for consumer and investor facing communications, in line with the Voluntary Carbon Market Integrity Initiative's (VCMII) Claims Code and the principle of 'decision-useful' information for the public and markets. As explained by the CCC, their use is confusing to the general public and many businesses, tilts the playing field against sustainable competitors and enables the biggest emitters to delay meaningful action.

The recent independent Net Zero review also supports this approach, calling for the UK Government to mitigate greenwashing by putting in place guidance for businesses looking to purchase carbon credits, and endorsing international standards to ensure the transparency and integrity of claims based on them. The UK's Carbon Trust has recently joined many market actors in drawing a line under the discredited and outdated 'offsetting' concept, with more and more businesses choosing to communicate credibly about their contributions to environmental initiatives, rather than the fossil fuel products and emissions they purport to make 'neutral'.

A ban on fossil fuel advertising and 'offsetting claims' is necessary to enable the UK to reach its potential as a leader in the transition to a low-carbon economy. It would prevent further delay on carbon reductions, avoid VCMs operating as a substitute for emission reductions, and empower the public to make informed decisions about key products and services for transition.

"We need to reduce reliance on fossil fuels. But instead of leading a low-carbon transition, these companies are putting out advertising which distracts the public and launders their image. We cannot underestimate the real world impact this disinformation has on the pace of change."

Jonathan White, Climate and Energy Lawyer

Energy systems

UK greenhouse gas emissions have fallen faster than any other G7 country: 46 per cent from 1990 levels, and in 2021 the Government made a commitment to reduce that figure further to 68 per cent by 2030. Extracting and burning fossil fuels – coal, oil and gas – is the largest source of global greenhouse gas emissions, driving climate change. This includes power generation, domestic heating, transport and hydrocarbon-based industrial processes. Burning fossil fuel is also one of the largest sources of air pollution globally.

To reduce UK emissions, it is essential that we continue to shift our energy systems away from fossil fuels towards climate-neutral sources of energy while minimising the negative impacts of mining and energy infrastructure – both offshore and onshore – on biodiversity and people. Recent political decisions around the licensing of offshore oil and gas and new coal pits threaten to further the UK's dependence on expensive and polluting energy and undermine the UK's call for increased action internationally. The key to energy security and sustainability is an efficient and lean energy system based on renewables that prioritises the wellbeing of all and that protects our critical habitats.

5. Reaching net zero

Our Ask: To ensure that the energy transition stays on track while boosting the UK's economic resilience and protecting nature, the UK should put in place credible plans for meeting its climate targets and introduce binding resource use reduction targets, alongside stronger targets on reducing energy demand.

ClientEarth is concerned that the UK's current plan to continue reducing emissions is not fit for purpose. The plan relies heavily on unproven and high-risk technological fixes such as carbon capture, which we believe comes at the expense of credible near-term action.

We believe that the Government's approach is so deficient that it is unlawful and have brought a judicial review of the plan that is due to be heard by the High Court. However, as well as bringing legal risks, we believe the Government's plan also misses a vital opportunity to put the UK on the path to a truly sustainable, fair and secure energy system.

The CCC has set out clear recommendations that real action on emissions can happen with policies that will also help struggling households, deliver benefits for people's health and wellbeing and reduce costs across the UK's energy system. Measures such as making homes more energy efficient through expansion of insulation, as well as investing in active and public transport, can all reduce emissions and increase the nation's energy security for the benefit of present and future generations.

Our continued reliance on fossil fuels is exacerbating the UK's energy and cost of living crisis and risking the UK's long-term economic resilience, as confirmed by recent analysis from the Office of Budget Responsibility. Fossil fuels are geopolitically fraught, expensive, and [do not provide the energy security of renewables or demand reduction measures](#). Eliminating wasteful or damaging uses of energy should be a national priority not just in terms of reducing emissions and protecting nature, but also economically.

In addition to energy demand, an important metric of the economy's environmental impact and overall efficiency is its material footprint. To ensure the UK's energy transition delivers long-term sustainability and economic resilience, the Government should introduce binding resource use reduction targets and strengthen its existing targets for lowering energy demand.

"It's not enough for the UK Government simply to have a net-zero strategy; it needs to include real-world policies that ensure it succeeds and that can deliver an energy system that is truly sustainable, fair and secure."

Sam Hunter Jones, Lead of Energy Systems

6. Withdrawal from the Energy Charter Treaty

Our Ask: The UK must take a proactive decision to withdraw from the Energy Charter Treaty.

The Energy Charter Treaty (ECT) is an outdated, controversial international investment treaty from the 1990s, which covers the trade and transit of energy between states and protects foreign investments in the energy sector. It contains a controversial mechanism called the 'Investor State Dispute Settlement' (ISDS) mechanism. This allows foreign investors to challenge governments for changes in social or environmental laws that impact their business. In recent years, several countries have made the decision to exit this outdated Treaty, citing its continued inconsistency with the Paris Agreement and domestic commitments, and the European Commission has now proposed an even wider coordinated EU withdrawal.

The CCC has called for the UK withdrawal from the ECT, which has been used by fossil fuel companies to sue international governments over their climate plans. ClientEarth maintains that the UK must take a proactive decision to withdraw, as failing to do so risks the UK becoming one of the few European countries left in an unreformed treaty. Failure to exit the ECT will hamper the national effort to tackle climate action both directly in the form of costly legal action from fossil fuel companies, and indirectly, from the so-called 'regulatory chill' effect, where this pressure causes governments to refrain from adopting climate policies.

There is no conclusive evidence that the ECT in its modernised version, would benefit the energy transition in any way, yet the costs for climate action are real. Exiting the ECT would be a welcome step in aligning our international climate and trade policies with our domestic climate and environmental goals, put the UK at the centre of decision-making, and create the political space for the UK to regain agency over its domestic energy policy. The speed with which the energy transition must take place in light of the climate emergency requires regulatory space to adapt and adjust in a flexible manner. A withdrawal would give the UK the regulatory flexibility we need to build a greener energy system that works for everyone.

“Governments should not be coming under fire for setting climate targets – they should be encouraged to do so. If companies are able to claim significant compensation for fossil-fuel phase outs, this completely undermines the energy transition.”

Amandine Van Den Berghe, Trade Lawyer

7. Finally addressing the toxic legacy of the Dieselgate scandal

Our Ask: The UK Government to support consumers who unknowingly bought excessively polluting cars and vans and act to protect people's health.

Road transport, especially diesel vehicles, is a key source of air pollution which has a devastating impact on people's health and their quality of life.

Analysis from the International Council on Clean Transportation (the "ICCT") – the organisation that helped to break the original Dieselgate emissions scandal in 2015 – suggests that, seven years on, 2.4 million vehicles still on UK roads emit levels of pollution that are so high as to indicate the likely use of illegal defeat devices.

The use of defeat devices is prohibited under UK law. They switch off or reduce a vehicle's emissions control system in certain conditions and can lead to excessive levels of air pollution emissions well over regulatory limits when a vehicle is driven in the real world, despite it having passed official emissions tests. This puts people's health at risk and undermines consumer trust.

The evidence suggests that this is an industry-wide problem: the ICCT's analysis of testing already carried out by public authorities across Europe suggests that over 200 vehicle models across almost all major manufacturer groups could be affected.

However, despite this evidence, little has been done by the UK Government to address the problem and force auto manufacturers to provide effective solutions.

The UK Government should provide support to consumers who unknowingly bought excessively polluting cars and vans and act to protect people's health. We urge ministers to:

- Fulfil their legal responsibilities to properly investigate whether auto manufacturers have been using prohibited defeat devices and, where this is the case, require them to urgently implement retrofit programmes to genuinely clean up these vehicles. This corrective action must be fully funded by the respective manufacturer without imposing any costs on vehicle owners;
- Require auto manufacturers that are found to have been using prohibited defeat devices to pay into a publicly managed 'Dieselgate Clean Up Fund'. This should cover the true costs of the harm caused by the excessive emissions from the Dieselgate legacy in the UK, and help accelerate the transition to a cleaner transport future;
- Stand up for consumers and people's health by ensuring that robust laws are in place and enforced to prevent further similar actions by the auto industry, urgently reduce air pollution and greenhouse gas emissions from road transport, and help to boost growth in the UK by improving funding for clean transport infrastructure.

Cleaning up our toxic air will protect the health of people in the UK, reduce the burden on the NHS, and also improve the financial health of the country.

“During a cost of living and public health crisis, it is more important than ever that governments stand up for consumers and people's health by addressing the toxic legacy of the Dieselgate scandal once and for all. This could also be an opportunity to boost investment and action for clean and effective transport solutions across the country.”

Katie Nield, Legal Lead of Transport Systems

8. Getting ahead of the clean transport transition

Our Ask: The UK Government should complement the ZEV mandate with national-level policies, measures and investment to provide help and support for people and businesses to move to cleaner forms of transport and step-up action on modal shift.

ClientEarth broadly welcomes the UK Government's proposals to legislate for a zero-emission vehicle ("ZEV") mandate to deliver the phase out of new petrol and diesel cars and vans by 2030, which aligns with the CCC's recommendations for a long-term strategy for banning the sale of petrol and diesel cars.

It is critical that the effectiveness of the ZEV mandate is not undermined with unnecessary loopholes (e.g. exemptions for non-plug-in hybrid vehicles, e-fuels, or small volume manufacturers) that would allow polluting cars and vans to continue to enter the market beyond 2030. Exhaust emissions from road transport were responsible for almost 22% of the UK's total greenhouse gas emissions in 2020.

Transitioning to ZEVs will not only help combat climate change but also improve air quality, as road transport is a major source of harmful pollutants like nitrogen dioxide and PM2.5. These pollutants are continuing to put people's health at risk, with exposure being linked to a host of health conditions including asthma, cardiovascular disease, low birth weights, cancer and dementia. Simply put: action to reduce the number of polluting vehicles on our roads will prevent early deaths and improve people's quality of life across the country.

Phasing out internal combustion engine vehicles is just one step towards cleaning up the transport system. The Government will also need to act to reduce overall traffic levels, if it is to deliver on net zero goals. [The CCC's 6th carbon budget](#) recommends that total car miles will need to decrease by almost a fifth (17%) by 2050 against 2020 levels. Reducing traffic would also deliver multiple co-benefits including reducing congestion that has been estimated to cost the average UK driver 80 hours a year, improving road safety, reducing noise, as well as harmful air pollution from tyre and brake wear, which will make our communities healthier and safer places to live.

The UK Government should complement the ZEV mandate with national-level policies, measures and investment to:

- Provide help and financial support for people and businesses to move to cleaner forms of transport. This should be targeted to support those on low-income households and small businesses to ensure a just and equitable transition, which reduces, rather than widens, existing transport inequalities. This could be funded, in part, via the Dieselgate Clean Up Fund referred to above;
- Step-up action to promote modal shift and drive down total road traffic numbers, including measures to increase the availability of and access to public transport, active travel and shared mobility schemes such as car clubs.

We need fewer and cleaner vehicles on our roads in order to deliver on net zero goals, reduce harmful air pollution, and make our towns and cities healthier and safer places to live.

"By not only focusing on cleaning up vehicles but also making the transport system more effective, we have the opportunity to make our communities cleaner, safer and healthier for all."

Katie Nield, Legal Lead of Transport Systems

9. Robust clean air laws that put people's health first

Our Ask: the UK Government should bring forward the deadline for achieving its existing target to reduce fine particulate matter pollution from 2040 to 2030 at the very latest, using this as a stepping stone towards achieving WHO guideline levels as soon as possible.

Cleaning up our toxic air will not only protect the health of UK citizens but also makes sense for the financial health of the country too. The Royal College of Physicians has estimated that the social cost of air pollution to individuals and the health service is over £20bn annually in the UK.

Similarly, the Confederation of British Industry (CBI) estimates that 3 million working days are lost every year to illegal and harmful air pollution. It has also calculated that a £1.6bn annual economic benefit to the UK could be realised if the existing legal limit for nitrogen dioxide ("NO₂") was met and levels of fine particulate matter ("PM_{2.5}") were reduced beyond existing legal limits to within 10 micrograms per cubic metre ("µg/m³").

The UK Government's new PM_{2.5} target set under the Environment Act 2021 defers these benefits of taking action on toxic air until 2040. However, its own analysis shows that reducing concentrations of PM_{2.5} to 10 µg/m³ is achievable long before 2040, with evidence to show that this could be delivered by 2030.

To be serious about protecting people's health the UK government must, in the first instance, bring forward the deadline for its PM_{2.5} pollution target from 2040 to 2030 at the very latest and set a clear path for how it will meet the more robust air quality guidelines set by the World Health Organization ("WHO") in the shortest time possible. This would make the UK a true world leader in protecting people's health, creating healthier communities and driving innovation and investment in clean technology solutions. It must also include a meaningful commitment not just to not weaken other existing legal air quality protections but to build on these and make them even more effective.

By reducing premature deaths and sickness absence for workers and their children, and by increasing productivity, the UK could see an economic boost, magnified by the pressure taken off the NHS and social care, as businesses and workers benefit from healthier air.

"Strong legal targets and robust frameworks are essential for driving action at all levels of government to deliver clean air."

Taking urgent action to reduce toxic air is a win-win strategy. It would not only lead to healthier communities across the UK, reduce pressure on our NHS, and unlock significant economic benefits, but also help reduce greenhouse gas emissions and tackle the biodiversity crisis. The science is clear and the public support it — inaction is unjustifiable."

Emily Kearsey, Clean Air, Water & Soil Lawyer

Food, ocean and land use

Food production is the biggest user of land, and is responsible for one quarter of the world's greenhouse gas emissions. The biggest threats to wildlife globally are over-exploitation (including fishing) and unsustainable agriculture (including crop farming and livestock farming). Use of pesticides and fertilisers in industrial farms contributes to air and water pollution responsible for major human health harms. 78% of global ocean and freshwater eutrophication (the pollution of waterways with nutrient-rich pollutants) is caused by agriculture, and of the 28,000 species evaluated to be threatened with extinction on the IUCN Red List, agriculture and aquaculture are listed as threats for 24,000 of them.

Food systems also have major impacts on the lives of Indigenous Peoples and local communities who rely on them for their homes and livelihoods.

10. A strong and comprehensive legal framework for agriculture

Our Ask: A strong agricultural framework outside the EU that prioritises environmental protection. We support the Government's Environmental Land Management schemes (ELMs) in principle, but believe they need a significant amount of additional development to be effective and should also be underpinned by a robust and comprehensive regulatory framework at the whole-farm level.

While ClientEarth recognises the potential of ELMs to deliver significant environmental benefits in England, there is concern that the Government is employing voluntary schemes as an alternative to robust regulation. This voluntary approach puts environmental standards at significant risk, and with the removal of the Rural Payments Agency as the most effective means of ensuring compliance with agricultural regulations, the UK Government risks losing an important deterrent for breaches of regulations relating to pollution from agriculture.

Furthermore, it appears that the withdrawal of existing regulatory standards has not been properly assessed from an environmental impact perspective and instead there is over-reliance on an exclusively voluntary approach under a still under-developed ELMs to deliver sustainable agricultural practices going forward.

Support for ELMs in its current form should be entirely conditional upon the implementation of an effective agri-environment regulatory baseline, sitting alongside ELMs, compliance with which is monitored, inspected and robustly enforced. That baseline must apply to all farmland and compliance should be a clear and explicit condition of participation in ELMs. In our view, the 'polluter-pays' principle should apply so that 'polluters' bear the costs of mandatory basic agricultural good practice, while public money is directed, via ELMs, to deliver more ambitious and innovative measures that lead to environmental improvement over and above this mandatory baseline.

With this in mind, the UK Government should prioritise strengthening ELMs and providing more information to the public on how the scheme will uphold environmental standards, support farmers and land managers and provide the ambitious steps needed to tackle complex environmental issues.

The loss of cross compliance within ELMs also impacts the overuse of pesticides, as cross compliance currently includes important restrictions on the use of pesticides near watercourses and hedgerows. We are therefore also pushing for better pesticide regulation. The Government's delay in publishing the revised National Action Plan for the Sustainable Use of Pesticides poses risks to the environment and human health. Pesticides not only harm their intended targets but also have significant impacts on non-target organisms, including people.

As well as increasing the economic resilience of the UK, the implementation of these changes would also serve to bring about a more sustainable farming sector with significant benefits for food security, climate change and the future of our natural environment.

"Regulations that protect our natural environment and our communities are there for a reason. But it's not enough for regulations to simply exist. We need the enforcers of environmental laws to be awake and willing to take action when breaches occur."

Kyle Lischak, Head of UK

11. Keeping to our 30x30 Commitments

Our Ask: a UK commitment to at least 30% of terrestrial, inland water, and 30% of coastal and marine areas, especially areas of particular importance for biodiversity and ecosystem functions and services, effectively conserved and managed by 2030.

Since 2019 the UK has led the Global Ocean Alliance, which has promoted a target to protect 30% of the ocean by 2030. At the 2022 Montreal-Kunming Biodiversity Conference, the UK played a key role in working with the international community to commit to a new international agreement that would protect 30% of global land, inland waters and 30% of oceans by 2030. This new international agreement has the potential to be a powerful springboard in global efforts to halt and reverse biodiversity loss, but it is of vital importance that the allocated areas the Government will choose to fulfil its international obligations are carefully chosen, are fairly governed, and effectively managed.

However, an urgent step-up is needed if the UK Government is to deliver on this target. Evidence shows that currently only around 6.5% of England is effectively protected for nature and that to reach this target a further, 3 million hectares must be protected: this equates to an area roughly one and a half times the size of Wales.

Despite the target, protected areas have a mixed track record in terms of actually conserving and protecting biodiversity. Without carefully analysing which areas should be protected and how they should be managed, simply classifying an area as 'protected' does not lead to benefits for ecosystems and wildlife and can even lead to further biodiversity loss.

In their plans for the 30x30 commitment, the Government should work with the Devolved Administrations to include:

- An analysis of the choice of area (priority ecosystems, intact areas, vulnerable ecosystems), its ecological connectivity and representativity, as well as the pressures and threats it currently faces, as an outcome of an integrated spatial planning exercise;
- Introduce effective conservation measures, in line with ecological needs of the area, accompanied by a concrete timeline of their deployment;
- Ensure that there is fair governance (inclusive, rights-based, decentralised decision-making, as well as periodic monitoring of progress).

The Government should also continue to increase the coverage of the UK's Marine Protection Areas, as well as ensure that the same are effectively protected against the threats of pollution, destructive fishing practices, and hydrocarbon-related activities. This should be alongside broader efforts to bolster enforcement measures to protect marine habitats and species in the wider ocean.

The 30x30 initiative will create an enduring positive impact on both nature and people, while also representing an indispensable nature-based solution in the fight against climate change, due to its climate change mitigation and disaster risk reduction and resilience potential. It will enable improved management of protected sites, landscapes, and public lands. The positive outcomes of nature's revival in these regions will extend much further than the strict confines of protected areas, having widespread benefits for everyone.

"Country leaders need to build on the political momentum generated by COP15 by transforming their national biodiversity strategies into strong legal or policy instruments, which outline actions for all sectors of government and even trigger the legal amendments and reforms needed to protect and conserve biodiversity. If the Framework isn't integrated into all relevant sectors at national level, then actually delivering its goals and targets will be near to impossible."

Ioannis Agapakis, Lawyer, Nature and Health

Summary

With precise, transparent, long-term legislative change, the UK could move into the crucial next decades with a new sense of opportunity. ClientEarth believes that the next government should take legislative steps to prioritise resilient, species-rich ecosystems; a safe and stable climate; an environment that is free of toxins, with clean air, soil and water – and these can all be underpinned by strong environmental justice and rule of law.

Our economy and financial flows sit at the heart of the change we need to see in the world. These include public sector finance mechanisms and private finance, market regulation, corporate governance, consumer rights, international trade laws and taxation mechanisms. We need to shift these towards our nation's net zero outlook and goals to unlock transformational change and new opportunities across all economic sectors.

Polling has consistently shown that a majority of Britons in every demographic group support the UK taking a leading international role in tackling climate change. ClientEarth believes that the upcoming 2024 general election provides a vital opportunity for environmental protections to be put at the heart of UK legislation to deliver benefits to health and nature for local communities and the people and wildlife living in them, help to alleviate the pressures on our NHS from pollution, and usher in an era of green jobs, industry, investment and innovation across all parts of the UK, as we continue to transition to net zero by 2050.

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