

Department for Environment, Food & Rural Affairs  
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02 June 2021

## **EDF's response to DEFRA's Consultation on the Draft Policy Statement on Environmental Principles**

EDF is the UK's largest producer of low carbon electricity. We operate low carbon nuclear power stations and are building the first of a new generation of nuclear plants. We also have a large and growing portfolio of renewable generation, including onshore and offshore wind and solar generation, as well as coal and gas stations and energy storage. We have around five million electricity and gas customer accounts, including residential and business users.

EDF aims to help Britain achieve net zero by building a smarter energy future that will support delivery of net zero carbon emissions, including through digital innovations and new customer offerings that encourage the transition to low carbon electric transport and heating.

We welcome the opportunity to respond to DEFRA's Consultation on the Draft Policy Statement on Environmental Principles. Our primary recommendation is that the Policy Statement should include a specific reference to the UK's legislated target of Net Zero greenhouse gas emissions by 2050. This would recognise that the Net Zero target is the most important UK policy for addressing climate change and seeking to prevent the irreversible environmental damage associated with it.

We welcome that the draft Policy Statement includes recognition of the need to take a proportionate approach in policy making when considering a wide range of issues. However, the draft Policy Statement does not elaborate on what this requirement for proportionality means in practice. We recommend that the Policy Statement provides further guidance on what a proportionate approach should look like. While no single climate or environmental goal should automatically outweigh another, long-term benefits should often be given greater weight than temporary or localised environmental damage arising from a specific project, particularly in the context of climate change mitigation.

In order to prevent disproportionate regulation and ensure an integrated approach to the application of principles in the formation of environmental policy, we also recommend that the Policy Statement should refer to the following principles:-

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- Evidence-based regulation – Decisions should be based on the best available scientific evidence.
- Risk-based regulation – Decisions should be based on an assessment of the risk to the environment.
- Proportionality of action – Decisions should be based on an assessment of the full set of costs and benefits of a policy or regulatory proposal.

We welcome the decision that the principles in the Policy Statement do not have a fixed hierarchy as it will allow flexibility for policy makers.

We also welcome the Policy Statement's requirement for policy-makers to take a holistic approach when considering the impact of a policy. As an example of this, the Policy Statement should refer to the concept of inter-generational equity, recognising that the task of preventing environmental damage should not be left to future generations; this point is particularly important when considering the damage arising from climate change. We would encourage DEFRA to elaborate on how long-term and short-term environmental gains or damages will be weighed against each other for improved clarity in policy making.

There is also a need for improved integration between regulatory bodies, with clear accountability and management of the boundaries between their responsibilities to avoid double regulation while maintaining a holistic view of environmental impacts when they are implementing the policy at individual decision-making level.

We believe that a duty on regulators to consider the Net Zero implications of their decisions would be an important step in enabling regulatory bodies to take a holistic approach and to consider longer term benefits for the environment from reducing greenhouse gas emissions.

We would also recommend that when the Policy Statement is finalised, there should be a requirement for the Policy Statement to be reviewed within a certain timeframe, say, every five years, to ensure that it remains relevant and appropriate.

I confirm that our response may be published on the DEFRA website.

Should you wish to discuss any of the issues raised in our response or have any queries, please contact

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Yours sincerely,

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