

North Yorkshire Council

Environment Executive Members

20 June 2025

Department for Energy Security and Net Zero – Voluntary Carbon and Nature Markets: Raising Integrity, Consultation

Report of the Assistant Director – Environment and Transport

1.0 PURPOSE OF BRIEFING

- 1.1 To provide a summary and overview of our proposed consultation response in relation to Department for Energy Security and Net Zero – Voluntary Carbon and Nature Markets: Raising Integrity Consultation.

2.0 BACKGROUND

- 2.1 On the 17 April 2025, the Department for Energy Security & Net Zero (DESNZ) launched the Voluntary Carbon and Nature Markets: Raising Integrity Consultation. The purpose of the consultation is to clarify the proposed policy approach and outline the governance framework to help improve the trust in using carbon and nature credits.
- 2.2 Voluntary carbon and nature markets allows companies and organisations to buy credits that represent either reduced or removed greenhouse gas emission for carbon or measurable environment improvements in the case of nature.
- 2.3 It is estimated that the use of these markets can raise additional finance and accelerate achievement of our global and domestic climate and nature goals. Under the right conditions, the Voluntary Carbon Markets are estimated to be worth between \$07-35bn by 2030 and \$45-250bn by 2050. To realise this investment opportunity that these markets offer, raising the financial and environmental integrity of these markets calls for improved domestic governance and international co-ordination. The proposed governance framework therefore seeks to clarify what constitutes as high-quality credit and provides guidance on how they can be used and under what regulatory conditions.

3.0 PRINCIPLES OF THE VOLUNTARY CARBON & NATURE MARKET CONSULTATION

- 3.1 In November 2024, the Government published six Principles for Voluntary Carbon and Nature Markets Integrity as a concept to help guide the unlocking of the carbon and nature markets. At this stage, it is now seeking feedback through a consultation on the proposed six principles.
- 3.2 These six principles are designed to guide responsible use of carbon credits, and they address the following issues:
- 3.2.1 Principle one: Use credits in addition to ambitious actions within value chains. Organisations should prioritise investment in their supply chain activities to support reductions in source emissions and environmental impacts. These reductions could include support for insetting activities within a buyer's value chain.

- 3.2.2 Principle two: Use high integrity credits. Suppliers should ensure credits meet recognised high integrity criteria to ensure credits deliver the environmental benefits they claim. They should ensure credits are independently validated; clarify and support mitigations of any social and environmental harms.
- 3.2.3 Principle three: Measure and disclose the planned use of credits as part of sustainable reporting. Information on the planned use of credits, for example to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target, should be disclosed as part of a company's sustainability reporting. All credit users are encouraged to voluntarily report publicly any use of credits.
- 3.2.4 Principle four: Plan. Where organisations make relevant transition planning disclosures, they are encouraged to use best practice guidance.
- 3.2.5 Principle five: Make accurate green claims using appropriate terminology. Claims involving the use of credits should accurately communicate an organisation or product's overall environmental impact, including by using appropriate and accurate terminology.
- 3.2.6 Principle six: Co-operate with others to support the growth of high integrity markets. Credit buyers should co-operate with other Voluntary Carbon Nature Market (VCNM) actors to support standardisation, wider information sharing, more equitable market access, reduce transaction costs, transparency, and interoperability.
- 3.3 The aim of these voluntary principles is to establish a new integrity framework which will help organisations move towards best practice. This consultation expands on each principle and invites views on how to implement each principle through different government guidance, principles, and regulation options.

4.0 SUMMARY OF CONSULTATION RESPONSE

- 4.1 The Consultation seeks to clarify and assess the UK Government's proposed policy and governance framework to ensure integrity of the VCNM credits and the use of credits. This could have a potential impact on NYC policy and service delivery. Hence, internal consultation has been undertaken with officers in both the Community Development Directorate, and the Environment Directorate. These are the following service areas who have been consulted:
- Planning Policy
 - Highways and Public Rights of Way
 - Environmental Policy
 - Climate Change
 - Natural Capital and Ecology
 - Tree and Woodland Management
 - Economic Development and Skills
 - Sustainability and Environment
 - Strategic Property
- 4.2 The consultation is wide ranging including technical questions covering integrity of credits, reporting of credits and the use in transition planning. In addition to broad questions on how best a UK designed integrity framework should align with international standards and best practices. To read the full consultation and officer responses please refer to Appendix A.
- 4.3 Principle one: Use Credits and ambitious actions within value chains – We are supportive of the first principle which clearly sets out the expectations that corporations and large-scale organisations should either remove or reduce their carbon emissions. Only when no further reductions or removals can be made should the use of carbon credits be used.

- 4.3.1 We agree with the government's proposal to recognise the Voluntary Carbon Markets Integrity Initiative (CVMI's) Claims Code as best practice. The Scope 3 guidance may have a negative impact on social and economic responsibilities and require some sectors such as manufacturing to spend significant funds to achieve Scope 3 targets. Regarding the Voluntary Carbon Market, we would suggest a move away from the Science Based Targets Initiative as many will struggle to achieve targets due to money and resource limitations. However, Science based targets should be developed and standardised for the developing Nature Markets. Clear guidance and standardisations should be developed with stakeholder involvement but limiting the influence of those likely to make financial gains. This is required in relation to insetting of nature credits and a clear definition for high integrity credits is also required.
- 4.4 Principle two: Use high integrity credits – We are supportive of the second principle which clearly sets out that credits should meet recognised high integrity criteria and deliver the environmental benefits they claim.
- 4.4.1 We agree with the government's proposal to endorse Integrity Council of the Voluntary Carbon Markets (ICVCM's) Core Carbon principle's (CCP's) and their accompanying Framework as a minimum quality standard; however, we have concerns around the use of using offsets to achieve targets. We believe the BSI Nature Standards should include other environmental impacts such as air quality, inner city temperatures and flood risk reduction. The lack of a Natural Flood Management (NFM) Standard makes it difficult to monitor, report and validate the effectiveness of nature-based-solutions making it harder for investors and stakeholders to evaluate their long-term performance. Clear definitions on terms such as Regenerative Agriculture are also required. Validation and verification bodies are also needed for many sectors of the Nature Market.
- 4.5 Principle three: Measure and disclose the planned use of credits as part of sustainable reporting – We agree that credit use should be disclosed clearly and consistently.
- 4.5.1 We are supportive of the government's proposal that corporations and large-scale organisations should disclose the use of voluntary nature credits. We request the consideration of making disclosure compulsory by the introduction of legislation rather than voluntary to assist in building demand for nature credits and increase confidence in the emerging nature markets.
- 4.6 Principle four: plan – We are supportive of the governments fourth principle that credit use should be part of a long-term transition plan to reduce emissions and environmental impact.
- 4.6.1 We agree that transition planning is beneficial enabling an organisation to set a long-term plan to cut emissions and reduce environmental impacts, however, we would like the government to consider making transition planning compulsory rather than voluntary. Transition plans support market transparency helping companies and investors to manage and properly price risks. They help stimulate investment and accelerate progress towards Net Zero, climate resilience and a nature positive future.
- 4.7 Principle five: Make accurate green claims using appropriate terminology – We are supportive of the governments fifth principle that clear terminology and definitions are agreed and provided for nature markets. We agree a UK Standard for green claims is essential to provide market confidence, remove double counting and reduce the risk of greenwashing.
- 4.8 Principle six: Co-operate with others to support the growth of high integrity markets – We are supportive of the governments sixth principle which reviews the options for the UK Carbon and Nature Markets to interact on a global scale.

- 4.8.1 We agree with the development of clear policy, guidance, and methodology to support the development of nature markets. Clarity is also required regarding stacking and additionality which is currently acting as a barrier to some landowners and managers.
- 4.8.2 We have identified a need for education, examples of UK best practice, technical feasibility funding and clarity on how the nature credit market would operate. These uncertainties function as barriers to the flow of private investment and buyers for Ecosystem Service credits.
- 4.8.3 We agree with the government's proposal for a high integrity UK market governance framework including standards, assurance, accreditation with regulatory compliance.
- 4.8.4 We believe the Local Nature Recovery Strategy (LNRS) will prioritise areas with the greatest impact for nature recovery and identify land managers wanting to implement nature recovery projects on their land. This will enable Local Authorities to prioritise nature-based projects and build the local offer for private investment on a regional scale.
- 4.8.5 We recommend the continuation of the Local Investment in Natural Capital (LINC) programme which is assessing the role of local authorities in the emerging nature markets. The York and North Yorkshire LINC programme will provide a proof-of-concept framework. We want to assess our triple aggregation model by assessing the role of the local authorities, a technical feasibility facility, a procurement model and demonstration pilots. Other local authorities could then replicate this triple aggregation model.
- 4.9 In summary, we welcome the government's commitment to establishing high integrity standards for both the voluntary energy carbon and nature markets. We believe the development of a strong nature market requires clear definitions, terminology and guidance.
- 4.9.1 We would recommend making both transition planning and disclosure of Voluntary Carbon and Nature Market credits compulsory.
- 4.9.2 We agree that Voluntary Carbon and Nature Market credits should only be used when no further reductions or removals can be made.
- 4.9.3 Nature is too complex to allow nature markets to develop without government legislation, support, backing and guidance. Indeed, it may be too simplistic to suggest that nature-based project credits can apply the same or similar approach as energy-based project credits because these two types of credits are measured, valued, and priced differently.

5.0 FINANCE

- 5.1 There are no specific financial implications for the Council associated with this report at this stage, in terms of responding to the consultation except for existing officer time which will be covered by staffing budgets already in place.
- 5.2 The Council will need to consider any implications of the final implemented version of the policy in its future work, and financial implications will be highlighted accordingly in future reports.

6.0 LEGAL

- 6.1 There are no specific legal implications for the Council associated with this report at this stage, in terms of responding to the consultation except for existing officer time which will be covered by staffing budgets already in place.

- 6.2 The Council will need to consider the legal implications of this consultation in full if all the recommendations are introduced as it may result in new disclosure requirements for the use of voluntary credits in transitional plans and strategies. There could be a requirement to align carbon offsetting strategies to the new integrity principles, ensuring transparency in credit purchasing and reporting. In time, clearer guidelines could be produced for biodiversity and ecosystem restoration which would assist the LINC programme to attract private investment into the region.

7.0 EQUALITIES

- 7.1 There are no specific equalities implications associated with this report.

8.0 CLIMATE CHANGE

- 8.1 There are no climate change implications associated with commenting on this report, however, the development of a VCNM would be beneficial to reduce the impact of Climate Change. It would provide a financial mechanism for businesses and corporations to invest in Natural Capital projects and technologies that reduce carbon emissions through carbon sequestration projects. Organisations that voluntarily offset their nature and carbon emissions go beyond current government regulation. The public reporting of carbon and nature offsets encourages corporations to set ambitious sustainability targets and achieve them. The purchase of carbon and nature credits creates a demand that encourages innovation, and businesses are incentivised to develop cleaner technologies and long-term sustainable practices.

9.0 RECOMMENDATIONS

- 9.1 That the Executive Member for Environment, in line with delegated authority, note the North Yorkshire Council statutory consultation process and
- 9.2 Authorise the submission of the Council's detailed response to the Department for Energy Security and Net Zero.

APPENDIX:

Appendix A: Voluntary Carbon and Nature Markets: Raising Integrity, Department for Energy Security & Net Zero (DESNZ) consultation response.

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20 June 2025

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Consultation Questions

Voluntary Carbon and Nature Markets: Raising Integrity, Department for Energy Security & Net Zero (DESNZ) consultation questions: -

Please refer to the full consultation document -

[Voluntary carbon nature markets: raising integrity - consultation document](#)

Principle 1: Use credits in addition to ambitious actions within value chains.

Q1. Do you agree with the Government's proposal to recognise VCMI's Claims Code as representation of international best practice?

Yes, in principle.

Q2. Do you have any views on VCMI's guidance for Scope 3, noting that the final version may be published during this consultation period?

The guidance needs to take account that it may not be so straight forward and simple in practice for certain sectors to maintain scope three emissions beyond 2032. Sectors such as manufacturing and building may struggle to achieve scope three targets, and to achieve these targets may be forced to spend significant capital. This is likely to increase the end users' price which could create a gulf in the market with the less economically mobile sector being hit hardest. Although the VCMI approach can help to achieve net zero, it may negatively impact on social or economic responsibilities.

Q3. Should the UK Government explore this concept further?

In relation to voluntary carbon credits, we would suggest a move away from use of Science Based Targets Initiative as this is an onerous process which many will struggle to achieve due to resource/money. However, Science based targets would be useful and should be developed and standardised for the developing Nature Markets.

Q4. Do you have views on the proposed criteria above and others that could apply?

Yes, this should be explored, but an appropriate definition for high integrity credits should be established.

Q5. Is there alternative language to 'towards Paris alignment' that could recognise the above actions in a way that is attractive, accurate and understandable?

We do not consider there is an alternative.

Q6. Which organisation(s) could help develop and apply the concept?

We would suggest the involvement of organisations required to apply the concept but limit the influence of those likely to make financial gains or profit.

Q7. Is there an appetite amongst stakeholders for further standardisation of high-integrity inseting approaches for industries, particularly the FLAG sector?

We would suggest there is an appetite for further standardisation for high-integrity inseting approaches, but these should not be restrictive and result in business limitations.

Q8. What other support could help reduce barriers to, or facilitate, inseting?

Clear guidance on how inseting of nature credits would work.

Principle 2: Use high integrity credits.

Q9. Do you have any concerns with, or feedback related to the proposal to endorse ICVCM's CCPs and their accompanying Assessment Framework, as representing a minimum quality requirement?

Always potential concerns around using offsets to achieve targets, but this label is potentially the most effective and provides guidance on standards to follow.

Q10. Do you have any views on the accompanying use of carbon credit ratings assessments by CCRA's, or any other steps or guidance that could help identify high integrity credits at the project level?

No

Q11. Do you have any views on the potential measures above that could accompany CCP endorsement, or any others not listed?

Not specifically but in general we are supportive of keeping the process simple.

Q12. What are the necessary components to effectively mobilise VNMs to deliver against international nature finance targets? How can the UK support development of these components?

We recommend that the BSI Nature Investment Standards should include other environmental impacts such as air quality, inner city temperatures, flood risk reduction and removal of invasive species and animal/plant diseases.

Q13. Do you think there are any additional considerations around the assurance for BSI Nature Investment Standards that the Government should consider?

Yes, there appears to be no plans for the development of a Standard for Natural Flood Management (NFM) schemes and projects in the BSI Nature Investment Standards. In the North Yorkshire region, we have significant NFM projects and the lack of consistent MRV standards means that the effectiveness of NFM solutions cannot currently be easily compared or scaled across different projects, limiting transparency, and making it harder for investors, regulators, and stakeholders to evaluate their long-term performance.

Q14. Do you believe that current standards adequately reflect the potential impacts of indirect land use change and fully account for net environmental impacts, and if not, how could environmental impacts be fully accounted for to help prevent leakage?

Current standards do not reflect the potential impact of land use change regarding nature credits and nature markets.
Further research is required to determine if for example, regenerative agricultural practices could produce crops at current crop yields. If crop yields are significantly reduced this could result in the increase of agricultural imports resulting in environmental impacts on land use in other countries.

Q15. Do you think there are any capacity barriers or other issues faced by validation and verification bodies in the UK or internationally?

- Currently not aware of any validation or verification bodies for Natural Flood Management Schemes.
- Clear guidance and clarification regarding flood risk reduction measurements is required. What would an NFM credit represent? How would it be measured?

Principle 3: Measure and disclose the planned use of credits as part of sustainable reporting.

Q16. Does your organisation use the ERG to guide engagement with voluntary markets? If so, could it be improved, and how?

As a local authority we do not currently engage with ERG.

Q17. Do you agree with the proposal to reflect VCMI's disclosure elements into the ERGs for carbon credit related disclosure?

As a local authority we do not currently engage with ERG.

Q18. Are there any elements missing from the list under VCMI's Claims Code of Practice, above, which could significantly enhance the quality of available information related to carbon credits and their use, and any which might be impractical to disclose or subject to sensitivity?

As a local authority we do not currently engage with ERG.

Q19. Should similar disclosure elements also apply for voluntary disclosures of nature credits, noting that nature disclosures will require additional reporting on location? If not, what should be included on nature credit reporting?

- Yes, similar disclosure measures should apply for voluntary nature credits.
- The Government should also consider new legislation making the disclosure of nature credits compulsory rather than voluntary. This would increase confidence in the emerging nature markets and assist in building demand for nature credits.

Principle 4: Plan ahead

Q20. What role, if any could the use of voluntary carbon and nature credits play in net-zero aligned transition plans?

Transition Planning is a process organisations undertake to define a strategic roadmap outlining how the organisation intends to adapt and transform its' operations, strategies, and business models to align with sustainability goals in response to the nature and climate crises. The transition plans should set out the actions that the organisation will take to meet their targets.

- Implementing and disclosing transition plans supports market transparency, helping companies and investors to manage and properly price risks. They also highlight where transition risks and opportunities exist within the economy, helping to stimulate investment and accelerate progress towards a Net Zero, climate resilient and nature positive future.

Q21. Drawing on the TPT guidance and other relevant sources, please provide your views on what additional types of information on voluntary carbon and nature credit usage would be important for inclusion in transition plans.

If producing transition plans remains voluntary and too complex, companies will not produce them or identify the environmental impacts of their business. We would suggest the Government considers introducing legislation making it compulsory to produce transition plans.

Q22. Is there a need for additional guidance on how organisations could use credits on their transition to net zero? This could be for the purposes of supporting compliance with any transition plan requirements, or to support voluntary transition planning and transition plan disclosures by a wider range of organisations.

The current guidance is 44 pages long. In the current global economic market, how many businesses are likely to spend time reading this document and implementing all the recommendations, especially if voluntary?

Principle 5: Make accurate green claims using appropriate terminology.

Q23. Outside of any pre-existing disclosure requirements you might already be subject to, do you see value in making ‘net emissions’ claims and/or ‘contribution’ claims in respect of your use of carbon credits, and if not, why?

Yes, this should be established and enforced.

Q24. To what extent is a lack of clarity on claims inhibiting wider use of voluntary credits? And is what, if any, is the role of the UK Government in addressing any challenges, e.g. through official definitions?

Considerable extent as investors etc see use of credits in certain ways.

Option 1: Develop official definitions for key terminology.

Q25. What are your views on Option 1, specifically: the value of UK Government defined credit related claims terminology, and any terms that should be prioritised?

To allow accurate monitoring, recording and verification for the developing nature markets it is essential that key terms are defined. Defining key terminology will ensure market transparency, increase confidence, and reduce investor risk.

Option 2: Commission the development of a standard for claims and require those claims to be assured.

Q26. What are your views on Option 2, specifically: the value of a UK claims standard as a mechanism for supporting greater use of high integrity carbon credits?

The development of a UK Standard dedicated to green claims should provide clarity regarding counting nature credits, removing the risk of double counting. It should clearly define periods (when is a nature credit valid and for how long?) Will there be more than one nature credit? For instance, will there be a water quality credit or a flood risk reduction credit? How would these be measured and how long would they be valid?

Q27. What other options could the Government consider to (a) support companies in making accurate claims, that use appropriate terminology, about their use of credits in voluntary action on climate and nature, and (b) support wider understanding of, and confidence in, such claims amongst relevant stakeholders?

- Regarding developing nature markets the Government should consider further Legislation to ensure companies accurately report impact on climate and nature.
- Clear guidance is needed to define environmental impact and how this can be measured and reported.
- Standardisation of reporting will increase both investor and public confidence in company reporting.

Principle 6: Co-operate with others to support the growth of high integrity markets.

<p>Q28. How could global carbon market capacity building be more effectively and efficiently deployed?</p> <p>A controlled market mechanism which has recognised Standards would provide trust for companies to trade and invest. Defined terminology would enable projects to meet recognised criteria and produce high integrity credits. These would be monitored, recorded, and validated providing market transparency, reducing risk, and providing confidence for investors and buyers.</p>
<p>Q29. Do you see any role for additional initiative(s) to support global interoperability of carbon markets?</p> <p>Clear policy and methodology are required to enable multiple benefits to be achieved from nature credit markets. There needs to be a flexible application for the stacking of Ecosystem Services as currently additionality can be a constraint to landowners engaging in the market.</p>
<p>Q30. For existing initiatives, do you see any barriers that would stop your organisation, or others, from participating?</p> <p>There is a lack of knowledge and understanding regarding the potential of the nature market. Education of stakeholders, landowners and managers is required.</p>
<p>Q31. Do you think the legal status of credits in the UK is sufficiently clear? Please explain your answer and include examples where possible.</p> <p>There is currently no legal clarity for nature credits. Further definitions are required. Is it the Government's intention to consider a water quality credit for example, as an object of private property or to allow common law to define the legal status of a nature credit? Unlike compliance BNG and Nutrient Neutrality markets, and voluntary woodland and carbon markets, there are no existing voluntary market standards or MRV methodologies for NFM.</p>
<p>Q32. What role, if any, should the UK play in promoting a consistent legal treatment for credits internationally?</p> <p>It is an ambition of the Government to build on the experience and foundation of a strong ecosystem of green investments and policy frameworks that will drive green transition and deliver economic growth. To deliver this ambition the Government needs to promote the consistent legal treatment of high integrity credits internationally. This will drive up the integrity in the markets, encourage project developers and innovation in financial products which can operate on the global credit market.</p>
<p>Q33. Will the accounting treatment for credits affect your ability to participate in voluntary credits markets? What characteristics of the credit and the market for credits will be necessary to maximise participation?</p> <p>There is currently a lack of consistency in the methodology, verification, and standards for nature credits. The process also needs to be simplified and include all Ecosystem Services.</p>
<p>Q34. Do you agree with the functional requirements set out for a high integrity UK market governance framework: standards; assurance; accreditation; and regulatory oversight?</p> <p>Yes.</p>

Q35. Do you agree that the measures set out in this consultation will help to provide appropriate regulatory oversight for UK VCNMs at their current stages of development? If not, what other interventions may be appropriate?

Further consideration of the definitions, measuring and reporting of nature market credits needs to be considered. It is short sighted to think that these markets will develop naturally and in a similar format to the voluntary carbon market. Nature is too complex and clear guidance and standards need to be established quickly to enable these markets to develop.

Q36. Do you agree with the considerations for the cross-regulatory working group, and are there any additional priorities for inclusion?

Yes, absolutely.

Q37. How can the LNRS and English Devolution framework be developed to:

- 1) encourages private funds and funders to use the spatial targeting available through LNRSs; and
- 2) better support increased private sector investment in nature and the development of nature and environmental markets?
 - a) LNRSs will prioritise the areas where nature recovery will make the greatest impact for nature, as well as (where available) identify land managers who want to implement nature recovery on their land. This will allow responsible authorities and funders to identify where to focus their efforts with the local VCNM. The responsible authorities, particularly when they are Combined Authorities, can use this spatial prioritisation to collaborate with partners to develop the nature-based projects and build the local offer for private investment.
 - b) UK Government should promote learnings from the four Local Investment in Natural Capital (LINC) Pilots to LNRS Responsible Authorities and Combined Authorities as examples of how to engage with local nature projects around private finance, engage with potential funders around this agenda, and build local investment opportunities at the LNRS scale.

Q38. Would you want the UK to consider and put in place governance arrangements to enable UK project developers to sell MCA6.4ERs through the Paris Agreement Crediting Mechanism? Please provide your reasons for your response.

Yes, as this enables access to a larger variety and market of credits – ensuring a fairer and more equitable share of finances.

Q39. If applicable, what interest do you have in buying credits through the Paris Agreement Crediting Mechanism?

No high integrity credits should only be purchased when the emissions and environmental impact of our organisation cannot be reduced any further. We are currently undertaking transition planning and if credits were required these would be purchased from local projects.

Q40. Is there a further role for the Government to play in enabling access to high integrity VCNMs for UK land and coastal managers to support the pipeline of credit supply? In particular, are there any Monitoring, Reporting and Verification (MRV) or auditing requirements for private finance schemes that you would like to bring to our attention?

The Government needs to take an active role to support the emerging nature markets. Clear guidance, definitions and terminology need to be agreed and widely circulated. Landowners and farmers are confused. It is important that current best practice based on

real world costs is recognised and rewarded to ensure nature is not damaged or lost to use the full financial reward of developing credits. There are currently no clear monitoring requirements for some nature improvements, e.g. the removal of invasive species and replacement of appropriate species to enhance the habitat.

Could credits be generated for this? How long would they be valid? What species would be included? Verification bodies also need to be established.

The LINC Programme has identified a number of key learnings: - need for agreed terminology, education of both project owners, investors, and buyers, lack of funding for technical feasibility studies, fractured demand and high risk and uncertainty of financial returns.

York and North Yorkshire LINC programme have devised a framework to assess triple aggregation to make the region the most attractive for private investment. This framework is assessing the role of the local authorities responsible for delivering LINC, the development of a technical feasibility facility, a procurement model and testing this with demonstration pilots. Further funding of this innovative programme of works will provide the Government with a proof-of-concept model that could be replicated by all local authorities.

Q41. Do you agree that the Government should trial a greater degree of stacking to gather real-world data on the benefits and challenges?

Yes. Funding the York and North Yorkshire LINC Programme would gather more real-world data on other related matters including the principles of additionality, double counting and evidencing lasting benefits.

Q42. What are the biggest challenges and opportunities of such a trial?

One of the biggest challenges is understanding the role of Local Authorities in the development and growth of emerging nature markets. How would Authorities develop regional funding to deliver nature recovery and climate adaptation?

The York and North Yorkshire LINC Programme currently faces a lack of future funding. Funding for a further 3 years would enable the work to implement and assess a self-funding model.

Q43. What further information or actions do companies need to see to feel confident and encouraged to engage in the Voluntary Carbon Market and purchasing of high-quality engineered removals credits?

To engage in the Voluntary Carbon Market companies, require more UK based examples. They need to see the pricing structure and methodology of how nature is financially valued and traded.

We would welcome all Government departments taking a pro-active role in showing their commitment by acting as potential buyers of nature-based credits.