Climate Law Matters: Live

14 July 2026

Introduction

1. Thank you to all that joined us for our first Climate Law Matters: Live seminar. This note sets out a summary and our thoughts on the legislation, cases, and other developments discussed in our seminar; as well as those which we didn't have time to address. All views expressed here are the views of the authors and do not constitute legal advice.

New legislation

Carbon Budget Order 2026 (SI 2026/695)

2. The seventh carbon budget (which came into force from 26 June 2026) sets the next interim target toward net zero by 2050. The cap on the net UK carbon account (per section 27 of the Climate Change Act 2008 ("CCA 2008")), for the 2038–2042 budgetary period, is now set at 535 million tonnes of carbon dioxide equivalent ($MtCO_2e$), which is approximately an 87% emissions reduction against 1990 levels.

3. This is the first time since 2008 that a carbon budget passed without cross-party consensus. Conservative peers tabled regret amendments, constituting formal parliamentary expressions of opposition without blocking the Order.

Climate Change Act 2008 (International Aviation and International Shipping) Regulations 2026 (SI 2026/727)

4. These new regulations were made pursuant to section 30 of the CCA 2008 on 30 June 2026 and came into force the following day: these are the Climate Change Act 2008 (International Aviation and International Shipping) Regulations 2026 (SI 2026/727). When adopting the sixth carbon budget (covering the period from 2033-2037) in 2021, there was a commitment to including emissions from international aviation and

shipping in the UK's carbon budgets and net zero targets. But section 30(1) of the CCA 2008 stipulates that those emissions "do not count as emissions from sources in the United Kingdom for the purposes of this Part, except as provided by regulations made by the Secretary of State." These regulations make the necessary legal change.

5. The regulations stipulate that – for the purpose of part 1 CCA 2008 – the UK's share of emissions from international aviation and international shipping count as emissions from sources in the United Kingdom for the 2033-2037 budgetary period and all subsequent budgetary periods. The meaning of "international aviation and international shipping" has the same meaning as in article 4 of the CCA 2008 (2020 Target, Credit Limit and Definitions) Order 2009; and the "UK share" of emissions from international aviation and shipping means such emissions of greenhouse gases from international aviation and international shipping as the United Kingdom is required to report in accordance with international carbon reporting practice. It falls upon the Secretary of State to determine the method before laying the first annual statements of emissions for Carbon Budget 6.

Climate Change Act 2008 (Repeal) Bill 2026-27

6. On 22 June 2026 Sir Christopher Chope (Conservative, Christchurch) introduced a Private Members Bill which intends to repeal the CCA 2008. Private Members' Bills rarely become law given the limited Parliamentary time allotted to them unless they receive Government support; indeed the chances of this Bill becoming law are virtually nil. It is, nonetheless, a depressing indication of the push back that measures to address the climate crisis face. Of note, both the Conservatives and Reform propose to repeal the CCA 2008 if elected at the next general election.

<u>Cases</u>

<u>R (Barclay & Communities Against Gatwick House Emissions) v SST</u> <u>[2026] EWHC 1556 (Admin)</u>

7. On 23 June, Mr Justice Mould dismissed two judicial reviews of the Development Consent Order ("DCO") for Gatwick's Northern Runway Project, clearing the way for only the second dual-runway airport in the UK.

8. Gatwick's northern runway existed only as an emergency standby, conditioned so it could not operate simultaneously with the main runway. In September 2025 the Secretary of State granted a DCO under the Planning Act 2008 ("PA 2008") removing that restriction. Mr Barclay, a local campaigner, and CAGNE, a residents' association, challenged the Order on grounds spanning airports policy, climate change, noise and drafting. Every ground failed: some were refused permission, others dismissed on the merits at a rolled-up hearing.

9. As a preliminary procedural note, this was among the first NSIP challenges under the amended PD 54D, following Lord Banner's review of legal challenges to infrastructure projects. The Practice Direction now requires that permission is addressed at an oral hearing. Mould J went further: he ordered a rolled-up hearing of the entire claim, listed within weeks, expressly because of the project's national significance. He also took a precautionary approach to a contested specific disclosure application in order to protect the trial date. The courts intend to make the Banner reforms work, and case management will bend towards expedition.

10. On the substance, Mould J granted permission on two of Barclay's five grounds and three of CAGNE's, but rejected all of them on the merits; the rest were refused permission outright.

11. Barclay argued the Airports National Policy Statement (“ANPS”) had chosen Heathrow’s third runway and so told against Gatwick. The judge held the opposite: preferring Heathrow as the site for a new runway never precluded better use of Gatwick, particularly where Gatwick demonstrated a different kind of demand — its low-cost carrier base — additional to Heathrow’s hub traffic.

12. Barclay also argued that the Secretary of State had failed to promote the policies of the PA 2008 and the CCA 2008, each of which had the common objective of mitigating climate change by reducing greenhouse gas emissions, and that the ANPS was out of date given the 2019 net zero amendment to the CCA 2008. Mould J disagreed: the Secretary of State had properly considered the relevance of the ANPS and had taken the Carbon Budget Delivery Plan (“CBDP”) into account. Although the CBDP had been found unlawful in separate proceedings in 2025, it had not been quashed and remained the relevant ss.13 and 14 CCA 2008 plan. Notably, the judge observed that the claimants never answered the question: what else was the Secretary of State to do? She was statutorily obliged to determine the application; she could not await a new ANPS.

13. The climate grounds are likely of the greatest interest to our podcast listeners. The judge rejected an alleged inconsistency between the Secretary of State’s conclusion that the emissions were "significant" for EIA purposes yet approvable. Significance under the EIA Regulations and materiality to carbon budgets under paragraph 5.82 of the ANPS are distinct questions. The increase was 0.657% of any single carbon budget. On the applicability of *Finch*, the judge held that where no meaningful benchmark exists — as for inbound international flights and non-CO2 effects — a qualitative assessment is lawful.

14. A full summary of the case is available on our website.

15. Both claimants have sought permission to appeal. Their applications for permission have been consolidated to be decided together by the Court of Appeal at a 1.5-day hearing. Since our webinar, permission to appeal was refused by the Court of Appeal (Holgate LJ and Dove LJ) on 4 August 2026, in summary, and focussing on climate-related matters:
    a. The Judge was correct in his approach to the Secretary of State's interpretation of the ANPS. The NPS specifically contended for increased capacity at airports other than Heathrow by making best use of existing runways.
    b. Whilst concluding that the effect of the development's carbon emissions would be significant, the Secretary of State did not consider the threshold for a "major significant adverse effect" in relation to the UK's trajectory to net zero as set out in the Institute of Environmental Management and Assessment's guidance on the significance of emissions had been met. There was then the policy question as to whether the development's failure to contribute to net zero was so significant that it would have a material impact on the government's ability to meet its carbon reduction targets, which was a question of judgement for the decision-maker.
    c. The Judge had been entitled to conclude that the Secretary of State's approach in relation to non-CO2 emission was not arguably irrational. The uncertainties were such that she was not persuaded that a quantitative, rather than a qualitative assessment, could be undertaken.
    d. The Secretary of State's approach to information relating to the Jet Zero Strategy ("JZS") had not arguably been irrational.

R (Luton and District Association Control of Aircraft Noise) v SST [2026] EWCA Civ 648

16. The High Court decision by Mrs Justice Lang upheld the grant of the DCO for the expansion of Luton Airport. 16 days after that judgment was handed down, the Claimant applied for permission to appeal. Before last year, that would have been within time –

however, a new CPR update which came into effect in October 2025 reduced the time for an appeal to the Court of Appeal relating to a challenge to a DCO from 21 to 7 days. The appeal was therefore out of time. On 19 May 2026 the Court of Appeal refused the Appellant's application for an extension of time to pursue an application for permission to appeal to the Court of Appeal.

R v Hicks (Rosa) [2026] EWCA Crim 706

17. The Court of Appeal refused an application for leave to appeal against the convictions of five Just Stop Oil activists for conspiracy to cause a public nuisance, which had arisen from an attempt to penetrate the perimeter fence at Heathrow Airport.

18. The Court of Appeal granted leave to rely on fresh evidence on the ground that a juror had conducted research into the case on the internet, which he had shared with other jurors, the court concluded that the evidence did not afford a ground for allowing the appeal. See [76]-[90]. All other grounds of appeal were also refused.

R (Barbican Quarter Organisation Ltd) v City of London [2026] EWHC 687 (Admin)

19. This was a challenge to the self-grant of planning permission by the City of London (the "LPA") for the demolition of several buildings near the Barbican and construction of new buildings for a mix of office, cultural, and food and beverage use.

20. The decision has primarily been discussed in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations 2017") as Fordham J found that the LPA had not kept functional separation between its planning and Environmental Impact Assessment ("EIA") screening officers contrary to regulation 64(2) but that this breach was insufficient to quash the grant of planning permission, see [19],[25]-[34].

21. The decision is also of interest in respect of retrofitting. The Claimant argued that the LPA had misunderstood or misapplied policy ‘CS15 – Sustainable Development and Climate Change’ of the City of London Local Plan. In particular, it was contended that paragraph 3 of policy CS15 amounted to a presumption against demolition. It was argued that officers had misunderstood or misapplied this policy by advising that the development complied with it, and that the reasons given in respect of the same were inadequate.

22. Fordham J dismissed this ground. Materially, he held that policy CS15 did not amount to a presumption or expectation against demolition; paragraph 3 could not be carved out as if it stood alone. Avoidance of demolition was one recognisable way of achieving the purposes of sustainability. Demolition did not, in and of itself, necessarily constitute a conflict with this policy. Policy CS15 required a robust consideration of alternatives including retrofitting and whether demolition could be avoided but this had been fully and clearly done in the officer’s report and was also communicated to the planning committee at the meeting. The LPA’s approach and conclusions were compliant with the policy and the reasons given were adequate and reasonable. See [62]-[73].

<u>Conceded: Challenge to 90MW Buckinghamshire data centre</u>

23. Last August, a challenge was brought to (then) Deputy Prime Minister Angela Rainer’s decision to grant permission for a 90-megawatt data centre at Woodlands Park in Buckinghamshire. The principal concern was the failure to undertake an EIA – the Secretary of State had determined that the development was not EIA development, notwithstanding there would be extensive scope 2 emissions arising directly from the electricity used to cool the data centre as well as the water usage requirements.

24. In the 9 July 2025 decision letter (“DL”) of the Secretary of State, it is noted that the data centre’s contribution to mitigating climate change was seen as a favour weighing in

favour of granting consent. In the inspector's recommendation, it was noted that the data centre was the "largest purchaser of renewable energy", it was more energy efficient than smaller and older facilities, and the developer was committed to the European Green Deal. On the issue of heat generated from the centre, it was noted as follows (para 5.155):

> "A Data Centre generates large amounts of heat from the servers. Normally, the excess is regarded as a waste product and released into the atmosphere. The scheme could be designed to harness the excess heat as part of a district heating network. This would be an additional but separate benefit that would assist in reducing carbon emissions. Although there are no plans for a district heating system to be implemented in the area, the opportunity would be there for future developments to tap into as and when it is needed."

25. The claimants in the judicial review, Foxglove and Global Action Plan, made representations at the inquiry. Those representations concerned the lack of certainty and "accountability measures" around the list of benefits from the development (para 7.62). The DL explained further as follows:

> "7.62. Foxglove & Global Action Plan (CD ID3). The energy and sustainability proposals lack detail, which has implications for the balancing exercise that the SoS has to undertake. VSCs, which include measures to address Climate Change, are relied on to justify this GB location. The Energy Strategy (CD A29 paragraph 1.4) proposes a suite of measures to satisfy the Council's target for more than 10% of energy to be sourced from decentralised and renewable or low carbon sources.
> These are,
> a. Maximised use of waste heat within the development with space heating and water heating incorporating waste rejected from the cooling systems.
> b. PV at roof level.
> c. The use of Air Source Heat Pumps (ASHPs) to provide space heating in parts of the building where the waste heat option is not suitable
> d. Sufficient quantum of the above technologies to ensure that the contribution from renewables can exceed up to 100% of the regulated demand associated with the administrative function of the buildings.
> e. Adoption of the principles of the Climate Neutral Data Centre Pact to ensure that electricity demand will be matched by 75% renewable energy or hourly carbonfree energy by 31 December 2025 and 100% by 31 December 2030.

"7.63. At first glance, the list of benefits is impressive. However, they are not backed up by binding obligations and accountability measures. The use of vague words such as "maximised", or jargon like "sufficient quantum", provide no substantive commitment to deliver a specified level of environmental benefit. The appellants only commit to delivering enough renewable energy to meet 100% of the "regulated demand associated with the administrative function of the building." However, there is no explanation of what included in the buildings' "administrative" functions and whether that includes the essential operation and cooling of the servers.

"7.64. Without further information the SoS does not know that the proposal would satisfy the Council's target for more than 10% of energy to be sourced from decentralised and renewable or low carbon sources. The data is simply not available to be scrutinised. It is stated that: "it is understood that the operator of the proposed Data Centre will commit to the Climate Neutral Data Centre Pact." However, the appellants are responsible only for developing the scheme. While the developer may hope that future operators will participate in the Pact, critically, it cannot ensure that they will do so, nor do they have any obligation to bind them to it as a condition of taking over the site. Should the SoS allow this appeal, there is no guarantee that a future operator would adhere to any of the various energy commitments.

"7.65. The Sustainability Statement makes no actual commitment with regard to water usage, simply asserting: "Data Centres will conserve water and set ambitious water conservation targets." Whilst it is common ground between the parties that these matters might be agreed at detailed approval stage, this means that the SoS should not give any weight to these "commitments," which may not materialise. If environmental commitments are given positive weight in the planning balance, appropriate conditions or obligations must be imposed to ensure delivery. Without such clear and actionable commitments, no weight can be assigned."

26. The Government conceded the case in January shortly before the permission hearing; and agreed that the decision should be quashed. It appears that the principal reason for the concession was that there had been a failure to ensure that the proposed measures to mitigate the impacts of GHG emissions were sufficiently certain – those measures had been relied upon to justify the decision not to require an EIA. The developer did not

concede until April when they accepted that the measures to mitigate the environmental impact would need to be made binding.

27. That appears to be a reference 5(5) of the EIA Regulations 2017, which deals with screening decisions, where it is determined that the proposed development is not EIA development, the Secretary of State must "state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment".

28. Data centres are very much at the forefront of the minds of planning, environmental and climate lawyers. Earlier in the year, data centres were brought into the Nationally Significant Infrastructure Project regime through an amendment to the Infrastructure Planning (Business or Commercial Projects) Regulations 2013, rendering them a prescribed project for the purpose of paragraph 10, schedule 1. The National Policy Statement is awaited.

Various Claimants v Mercedes-Benz Group AP and others [2026] EWHC 1753 (KB)

29. On 10 July, the High Court handed down judgment in the Pan-NOx Emissions Litigation, the largest group action in English legal history: 1.6 million car owners suing more than a dozen manufacturers, including Mercedes, Ford, Renault, Nissan and Peugeot-Citroën.

30. The background to this case is the so-called 'Dieselgate' scandal. In 2015, Volkswagen was caught using software that recognised when a car was undergoing the official emissions test and responded accordingly, such that cars would have cleaner emissions in test conditions than on the road ('cheat devices'). VW settled the English claims in 2022, and claimant firms then brought the same model of claim against virtually every other diesel manufacturer.

31. In contradistinction to the VW claim, the claim in this case rested on the engineering compromises found in every diesel car rather than on distinct cheat devices. Controlling the pollutant at issue, NOx, involves trade-offs against fuel economy, engine wear and safety, so manufacturers calibrate the emission controls to ease off in certain conditions: in cold weather, at high speed, under heavy load. The claimants said each of those calibrations constituted an illegal "defeat device," because the emission controls worked better in the warm, gentle laboratory test than in real driving.

32. After a thirteen-week trial, with sample vehicles stripped back to their original software and re-tested in labs and on roads, Lady Justice Cockerill rejected the Claimant's analysis. She held that a defeat device is one that senses the test and is designed to perform better in it than on the road – akin to the VW cheat devices. The regulation prohibits cheating the test. It does not prohibit engineering judgment. She called the claimants' contrary theory the "dream car fallacy": the assumption that unless every setting is pushed to its limit in all conditions, the car is illegal.

33. On the facts, the claimants lost on almost all points. Of roughly forty alleged devices, genuine cheat-type devices were found in just two places: one Mercedes function and Peugeot-Citroën's so-called "split mode."

34. The judgment matters beyond the bounds of this specific case for two reasons. First, the ruling largely closes off UK diesel claims worth billions, though a damages trial on the surviving findings follows in October. Second, and doctrinally striking, the Judgment diverted from the CJEU, which has held that these temperature-based calibrations generally are defeat devices. As the CJEU's rulings came after Brexit completion day, they no longer bind English courts. Cockerill LJ declined to follow them, saying in effect

that the CJEU decided the point on one engine and a thin factual record, while she had the benefit of significantly more evidence.

35. An appeal is very likely, and the judge made alternative findings in contemplation of that occurrence.

Re Hassard's Application [2026] NIKB 10

36. This case related to a decision and order made by the Department for Infrastructure in Northern Ireland to enable the dualling of the A5 road from South of Strabane to Ballygawley, comprising part of Northern Ireland's largest infrastructure project. These were quashed by McAlinden J in [2025] NIKB 42. The applicant argued, and McAlinden J agreed, that the decision and order breached s.52 of the Climate Change (Northern Ireland) Act 2022. This section requires Northern Ireland to achieve net zero by 2050. McAlinden J held that the evidence base for the decision and order did not demonstrate that the specific GHG emissions from the scheme had been and would be taken into account in the overall assessment of whether Northern Ireland would meet its 2022 Act targets and remain within the budgets set thereunder.

37. The 2025 decision was appealed against by the Department for Infrastructure to the Court of Appeal. In the course of the appeal the Department of Agriculture, Environment and Rural Affairs joined the appeal as an intervener; this Department is responsible for preparing a carbon action plan pursuant to the 2022 Act. They filed evidence and raised a new issue as to what their responsibilities were under s.52(1) and how that related to the Department for Infrastructure who approved the dualling scheme. The Department for agriculture's concern seemed to be that they considered the 2025 judgment required them to take into account project specific emissions in any carbon action plan. The Court of Appeal remitted this matter back to McAlinden J.

38. In short, McAlinden J held that neither the Department of Agriculture, Environment and Rural Affairs nor any other department had a duty to specifically include project-level emissions in a carbon action plan or sectoral plans provided that such emissions were properly accounted for in the methodologies and modelling presently used in Northern Ireland to project future GHG emissions. McAlinden J reiterated the point that the construction and operation of a large-scale infrastructure project requires robust planning, synchronisation and co-ordination between all Northern Ireland government departments to ensure that the project fits into the plans, strategies and policies which map out a realistic and achievable pathway to achieving net zero by 2050. See [100]-[106].

39. The substantive appeal will now be considered by the Court of Appeal in Northern Ireland.

Robin Wood v European Commission (T-575/22)

40. This challenge was brought pursuant to article 263 of the Treaty on the Functioning of the European Union ("TFEU"). The claimant sought an annulment of the European Commission's decision to reject their request for an internal review of regulation 2021/2139, which established technical screening criteria for determining when forest management and bioenergy activities qualify as sustainable under Regulations 2020/852. The court determined that the Commission was entitled to adopt qualitative rather than quantitative criteria, given the diversity of European forests, and that the Paris Agreement and UNFCCC provisions lacked direct effect and could not be relied upon to challenge the Regulation's lawfulness.

Slovenia successfully defends fracking ban

41. Slovenia has successfully defended an International Centre for Settlement of Investment Disputes ("ICSID") arbitration brought by UK energy company Ascent

Resources plc and its subsidiary in relation to alleged breaches of the Energy Charter Treaty ("ECT") brought under the ECT (which includes an investor state dispute settlement mechanism) and the UK-Slovenia bilateral investment treaty. Currently the arbitral award is not available, but reports suggest that Ascent had sought €598.7 million in damages in connection with Slovenia's regulation of the Petišovci oil and gas field in north-eastern Slovenia. The tribunal also ordered Ascent to pay €3 million towards Slovenia's costs.

42. The Slovenian environmental authority had initially required an EIA for the hydraulic stimulation activity in the field then by way of a subsequent 2022 amendment to the Mining Act banned hydraulic stimulation (or fracking).

43. Reports suggest that the tribunal found the decision to order the EIA was not discriminatory or arbitrary; and that Ascent could not legitimately expect that there would be no change in the regulatory framework governing fracking. It said that Slovenia's concerns regarding the environmental impacts of hydraulic stimulation of wells were justified, even if the risk was not particularly high, according to the state.

Reports

Climate Change Committee Progress report 2026

44. The Climate Change Committee presented their process report to Parliament on 24 June 2026. This statutory report provides a comprehensive overview of the UK Government's progress to date in reducing emissions.

45. In summary, the report finds the UK is not decarbonising fast enough, with electrification of transport, heating, and industry lagging behind what its climate targets require. This imperils the UK's ability to meet its Paris Agreement commitments, and also leaves

consumers whose energy is dependant on fossil fuels exposed to price shocks (as recently seen during the war in Iran).

Farming Roadmap 2050: Growing England's Future

46. On 25 June 2026, a policy paper was published setting out a roadmap and the practical steps the government intends to take over the next five years to show how they can work with farming to meet the various challenges facing the sector including the environmental and climate crises. It recognises the significant impact of climate change on farming, including its exposure to climate shocks, environmental degradation and growing resource pressures, as well as the impact of agriculture on the environment. It develops various proposals to reduce agricultural GHG emissions from livestock, slurry, input and energy management; make strategic use of less productive land for carbon storage (through peatland restoration and woodland creation); retake and improve carbon stocks in agricultural soils and support farmers in adaptation measures.

Proposed adjustments to EU Carbon Border Adjustment Mechanism ("CBAM")

47. A CBAM complements an emissions trading scheme, the intention is that carbon intensive products from overseas face a comparable carbon price to that paid by producers within the trading scheme so as to minimise the risk of carbon leakage - where production relocates to countries with laxer emissions regulations. Chris discussed this, inter alia, with Dr Diana Casey in the November 2025 episode of the podcast.

48. On 1 January 2026 the EU CBAM went into full effect. At the start of July 2026, the EU's Committee on the Environment, Climate and Food Safety adopted its position on proposed changes to the EU's CBAM. These proposed changes include:

a. Extending the scope of the mechanism beyond basic materials to a long list of downstream products – including finished steel and aluminium goods such as fasteners, wire, springs and household articles.
b. Adding an exemption for electricity flows from non-EU countries used by grid operators to keep networks stable.
c. Closing loopholes in the CBAM.
d. Simplifying reporting for least-developed countries.
e. Introducing a technical assistance framework.
f. Removing the Commission's option to count Paris Agreement Article 6 carbon credits against CBAM obligations.

49. The EU Parliament is scheduled to adopt its mandate for negotiations with EU member states on the final shape of the bill during the September plenary session.

Ones to watch out for

R (on the application of Foodrise Ltd (formerly Global Feedback Limited)) v HMT & Ors

50. On 11 June 2026 the Supreme Court heard an appeal by Foodrise Ltd against the decision of the Court of Appeal in [2025] EWCA Civ 624 that Foodrise Ltd's judicial review relating to the environmental impacts of the UK-Australia Free Trade Agreement[1] was not an Aarhus Convention claim for the purposes of CPR r46.24(2)(a) and thus did not benefit from the costs limits under Section IX of CPR Part 46. The Court of Appeal overturned the decision of Lang J, [2024] EWHC 1810 (Admin), who had held the claim was an Aarhus Convention Claim. The Supreme Court's judgment is eagerly awaited.

[1] Specifically challenging the lawfulness of the decision of the Respondents, on 22-23 February 2023, to make the Customs Tariff (Preferential Trade Arrangements and Tariff Quotas) (Australia) (Amendment) Regulations 2023 (SI 2023/195)

Government proposals to restrict judicial review for critical national infrastructure projects

51. On 20 May 2026 the Government announced that it was proposing to introduce two new optional mechanisms to the current process for consenting nationally significant infrastructure proposals to, the Government say "*allow for proportionate protection from JR*". One mechanism is for critical energy NSIP's to be authorised by parliament, essentially to put the resultant DCO on the same footing as primary legislation, the other is introducing a challenge window mechanism, which would allow Secretaries of State to respond in a more agile fashion to potential issues before finalising a planning consent, and limit the ability to raise other issues after the final consent was published.

52. The aim is to speed up the delivery of NSIPs and try to further reduce the scope for legal challenge delaying NSIPs. This is the same aim that led to changes in the Planning and Infrastructure Act 2025 to reduce the number of attempts a claimant can make to bring a legal challenge, from three to one for meritless claims, but is certainly more innovative. We will have to wait and see whether, and if so how, the Burnham administration takes this forward.

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