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Discussion paper

Incentives as policy scaffolding for a sustainable screen industry

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Abstract

Incentives are a key driver for enhancing sustainability in the screen industries, yet they remain under-deployed and poorly understood in the UK, where the sector relies on semi-mandatory certification. While such approaches have put sustainability on the agenda, they have delivered neither significant reductions in environmental impact nor meaningful cultural change. This paper examines the incentive types used in the UK – automatic and discretionary, the latter operationalised through uplift or eligibility models, and compares these with approaches in Europe, Brazil and New Zealand. Drawing on scholarship, industry research, policy document analysis and industry-academia workshops, we argue that incentives can integrate sustainability into the production chain as a commercial and competitive advantage, with the capacity to offer operational, cultural, educational and economic benefits. Identifying money and power as the key areas to address, the paper concludes with recommended directions for UK government policy.

Introduction

Incentives are a key driver to enhance the adoption and enforcement of sustainability measures in the international screen industries. Yet, they are not fully deployed or understood in the UK, where the industry tends to rely on semi-mandatory certification (see BAFTA albert 2025; BFI, BAFTA and Arup; 2021). While these approaches get the sustainability discussion 'into the room' (i.e. on the agenda), they remain compromised by unclear standards and a self-governing approach, as well as a concentration on intra-industry communication, with no real attempt to leverage consumer or user awareness for political lobbying. Furthermore, despite increased publicity and a measure of concentrated effort both in terms of governance and on-the-ground activity there has been no significant reduction of the negative impact of the screen industries, nor fundamental, impactful cultural change in its day-to-day practice.

This paper therefore aims to examine the current picture in the UK, the types of incentives that are currently used and how these compare to incentives that are being operationalised elsewhere in the world. Building on academic scholarship (see Maxwell and Miller 2012; Cubitt 2017; Starosielski and Walker 2017; Kääpä and Vaughan 2022; Sørensen and Noonan 2022b) and industry interventions (BAFTA; BFI and Arup 2021; Sustainable Entertainment Alliance 2025), we explain how incentives provide an opportunity to fully integrate sustainability into the production chain as both a commercial and competitive advantage. They also provide a viable mechanism for changing industry cultures. In this respect we ask if they can be more than financial incentives but also have a 'cultural' dimension in terms of transforming industry cultural norms and values through, for example enhancing training and educational opportunities, and lead to, as a result, economic impacts in the longer term (i.e. capacity building; talent and skills). This would move the industry away from a short-term focus on each individual production to a longer-term change in the industry culture and ecosystem.

The paper starts in Section 2 with an examination of the UK policy context and the types of incentives that are used, namely automatic and discretionary (selective) approaches. We focus especially on analysing how discretionary

incentives are used as either encouragement or as mandatory enforcement via an uplift or eligibility model of implementation. In section 3, this conceptualisation is used to compare other approaches to embedding environmental concerns into screen production at the level of Europe, at the national level and at the regional/local level. This includes a consideration of initiatives used in the Netherlands, Austria, Portugal, Italy, Germany, France, the Nordic approach, Ireland, Brazil (São Paulo) and New Zealand. Finally, in Section 4, the paper takes what has been learned from these approaches together with learning gained from industry, policy and academic workshops to highlight the key areas to be addressed, namely money and power. The paper concludes in Section 5 with suggested future directions for the UK government to consider, that could address the current issues and barriers to creating a more sustainable industry at every level.

2. UK CONTEXT

2.1 Sustainable Film Policy in the UK: Structural Gaps

The UK's screen media sector (predominantly film and television but also streaming) have emerged as a global leader in designing and delivering sustainable screen policy. Addressing the emissions generated by film and television production through, for example, production logistics, energy, catering, and travel arrangements, central organisations such as the British Film Institute (BFI) and frameworks such as BAFTA albert have set international standards for the sector's sustainability efforts. They have not only continued to shape film and television production domestically but have been adopted as a model in industries as diverse as Finland and Australia. Yet, there are limitations in the scope and efficiency of the UK sustainable production model. For example, the recommendations presented in otherwise groundbreaking and industry-leading interventions like the Screen New Deal (2021) or subsequent policy interventions like ACCELERATE (2025) are reliant on carbon calculation, conditional funding, voluntary standards, and industry initiatives that have been critiqued for their ineffectiveness.

While such approaches are effective in raising awareness and standardising practices across diverse, geographically and culturally dispersed domestic sites of production, the BAFTA albert model is limited in enforcement: for one, the key intervention proposed by ACCELERATE is to require more tangible actions outside of measurement and reporting. To explain, the BAFTA albert Carbon Action Plan (CAP) requires at least 55% compliance on the proposed actions to achieve certification, which is verified by submitting evidence of the actions taken. However, these current requirements are based on self-reporting and thus allow voluntary or selective data, with questions persisting over the extent of restrictions on, for example, domestic flights (i.e. they are permissible under 'certain' conditions, leaving reporting requirements ambiguous).

Arguably and most importantly, the certification itself remains an intra-industry mechanism with little to no public awareness and traction (i.e. there is no attempt to enhance consumer sentiment about the industry's environmental practices). As a consequence, public awareness is lacking and there is a distinct absence of political leverage to scale up these existing semi-voluntary frameworks into enforceable governance mechanisms - and no viable incentivization mechanisms in the form of tax credits or similar.

This paper outlines the current gaps and omissions in the UK structure, by providing comparative examples of best practice from other international locations, as well as spotlighting emerging practices from local, regional and hyper-local contexts domestically. It will then outline potential pathways for the future development of sustainable film policy through a hypothetical incentives map.

2.2 The UK Policy Model

The primary challenge with the UK sustainable film policy approach is its heavy reliance on 'soft governance' which is embedded in funding, industry tools, voluntary guidelines, sectoral collaboration and supported by long-term strategies like the BFI/BAFTA/ARUP *A Screen New Deal* from 2021. These are also reflected in the UK's role as a key production hub for incoming productions

especially from the US. The investment of major studios and streamers in sustainability through the Sustainable Entertainment Alliance (SEA 2025) similarly contribute to this soft approach as their important work outlines best practice standards and good-to-have sustainability practices and addresses challenging areas like Scope 3 (sustainability of outsourced suppliers), but as they remain a self-regulating industry body, the reach of their recommendations and guidelines are limited. At the same time, it is entirely necessary and fair to acknowledge that the albert/SEA voluntary approach is driven by a pragmatic understanding of the industry as a competitive and financially successful sector beholden to commercial expectations and financial profit margins that underpin their management and evaluation of their economic performance. It would be unrealistic to require the sector to compromise on this.

Challenges that compromise the effectiveness of current incentives and initiatives:

1. Current practices with offsetting (i.e. purchasing carbon credits) compromise the effectiveness of sustainability initiatives. For example, research into carbon credit purchases (Pantet, Rompotti and Kääpä 2026) indicate that these tend to require minimal financial investment – for example, in Finland, the credits purchased to offset the production of *The Wait* (Odotus, 2021) equated to only 670 Euros, but allowed the production to widely claim net zero credentials.
2. The deployment of, for example, Virtual Production (VP) or AI to cut back on production emissions. At the same time, there is increasing evidence and critical discussion of the environmental impacts of these technologies (see Bridges 2026; Sustainable Entertainment Alliance 2025; Co-STAR 2025; Fazio et al 2025). To put this into context, some estimate that water consumption increases for server farms will require '731 to 1,125 million m3 and additional annual carbon emissions from 24 to 44 Mt CO2-equivalent between 2024 and 2030, depending on the scale of expansion' (Xiao et al. 2025: 1). This is in addition to the carbon emissions generated by AI-focused data centres in the UK, an issue which has recently received much

coverage due to underestimation of its impacts (Gayle 2026). Whereas early claims suggested AI-based emissions would reach a maximum of 0.142m tonnes of CO_2 in a single year, more accurate estimates have upped this 100-fold as AI emissions can scale up to 1.23 Mt CO_2 for one year (equivalent to 240-250.000 households).

Such direct environmental concerns are only a part of the picture, as AI's impacts on social sustainability, including labour and employment, but also equal access to the 'benefits' of escalated AI use, are only beginning to be understood. Key amongst them is the ways AI use (whether for Large Language Model (LLM) training or AI Generated Content (AIGC)) shifts the impacts away from the place of production (i.e. a studio VP set) to the place of data processing (i.e. the servers where, for example, CGI rendering happens). While AI may make tangible production logistics more sustainable and effective, this does not account for the fact that in most cases using AI for such tasks displaces emissions into other contexts where the power costs of servers and systems are located (see Crawford 2021; Hao 2025), enacting a form of tech-based neo-colonialism based on outsourcing/displacement of the environmental costs elsewhere (like a dark version of offsetting), instead of, as ever, the prophesized technological commons from easy access to AI tech. The UK government's current laissez faire approach to AI regulation can be problematic in this respect as the emphasis on international competition instead of safety and sustainability can contribute a race to the bottom in the face-off between commercial gain and environmental impacts.

2.3 Types of Incentives

To develop a more granular understanding of the UK's sustainability framework, it is necessary to turn to exploring the policies that exist to both coordinate and incentivize the adoption of sustainability measures and tools. In this section, we will outline the types of incentives that exist to spur on the adoption of these measures.

There are two types of incentives in the UK: selective and automatic incentives.

Selective incentives are grants, awards or loans and allocated via UK (BFI) and regional and national screen institutes (Screen Scotland, Ffilm Cymru & Northern Ireland Screen). Selective incentives are qualitatively assessed based on the project's artistic, cultural and/ or commercial strengths.

Automatic incentives are comprised of tax incentives allocated via the UK tax code administered via the UK government's tax office the HMRC or are a match funded uplift or point based uplift from regional or screen commissions. The table below illustrates the composition, criteria and administrating agency of the two funding forms in the UK selective and automatic:

	Selective funding	**Automatic funding**
Advising or awarding agency	Film Institute Broadcasters	Screen commission Enterprise agencies Regional screen offices
Type / form	Grants Award/unconditional funding Match funding	Match funding Point based funding Tax incentives.
Criteria	Qualitative assessment of on merit of projects. Decided by funders/committee at national film/screen institutes	Tax or expenditure threshold Point based criteria & match funding Cultural test (a territorial criteria)

Supports	PRODUCTION (development, production, post-production and distribution of productions). INDUSTRY (Slate funding and company development. TRAINING & EDUCATION (Film education, professional skills development and training) SOCIAL JUSTICE OUTCOMES (EDI, widening participation, audience development).	PRODUCTION (production & post-production). Location scouting and management
Purpose	To support artistic or quality projects of national and international significance **Cultural imperatives dominate**	Retain production within an area Attract incoming productions inward investment in national or local screen economies. **Economic imperatives dominate**
Source	Departments of Culture	HMRC and regional councils[1]

Table 1. Selective and automatic funding in the UK (adapted from Sørensen, forthcoming 2027)

The distinction between selective and automatic incentives is key to understanding sustainability governance as it determines where and how sustainability measures can be embedded into the production system. Selective funding provides an intervention point for more qualified or measurable sustainability aims as projects must pass through an application and assessment process. Funders can therefore require sustainability plans, evaluate

[1] This applies to incentives such as the 40% reduction in business rates over 9 years for film studios to be administered by local authorities (Gov.UK, 2025).

environmental commitments alongside artistic or cultural merit, set benchmarks and standards, and encourage broader social outcomes such as skills development or inclusion. However, because these schemes represent only a relatively small share of overall production finance, their ability to transform industry-wide behaviour remains limited.

Some selective funding bodies have nevertheless demonstrated how sustainability can be embedded more deeply into funding processes. The Flanders Audiovisual Fund (VAF), for example, treats sustainability as an ongoing process of institutional and cultural change (Milla and Chochon, 2019). Productions receiving support are required to develop sustainability action plans, receive coaching and guidance, participate in production follow-up visits, and undertake carbon calculations. The release of the final funding is contingent on these commitments being fulfilled. In this respect, VAF illustrates how allocating selective funding to qualified sustainability projects can be used to build industry capacity, indicate strategic priorities, develop skills, and instigate behavioural change over time.

Automatic incentives are more consequential because they operate at a much larger scale and shape the economic conditions under which production takes place. While they have a systemic reach, such macro-level, generalisable approaches also lead to weakened environmental requirements. Unlike selective funds, tax reliefs and rebate schemes are designed to be automatic: if a production meets the qualifying criteria, support follows as part of the package rather than based on assessment of a production's sustainability objectives. The result is a paradox at the heart of public funding systems. Sustainability is scrutinised most closely in the selective funding programmes which have the least financial leverage and thus, arguably, compromised impact. In contrast, the incentives based on tax breaks and rebates are worth much more, but they remain largely disconnected from environmental performance (Kääpä and Vaughan 2024).

The distinction between selective and automatic incentives also transforms behaviour in the industry as these incentives shape whether sustainability is treated as something producers must demonstrate, or something they can qualify for automatically. The distinction between these two is particularly significant as it reveals how public incentives shape industry behaviour beyond pure economic objectives. In the UK, access to tax reliefs is subject to a minimum spend and productions passing a cultural test. Administered by BFI on behalf of the UK government, the cultural test was introduced in 2005 to determine if a film qualified as 'British', thereby making it eligible for tax relief (Schlesinger, 2009). Access to the incentive is contingent upon productions attaining a minimum threshold score across a range of qualifying criteria. Access to tax incentives through the cultural test was intended to not only stimulate economic activity but also to advance wider cultural policy objectives, such as the increased use of culturally relevant settings, subject matters, characters, language, cultural contribution, and the use of UK creative talent.

The framework of the cultural test related tax incentives raises a wider policy question: if public incentives can be used to promote cultural value, why can they not be used to promote environmental value? An environmental sustainability test could apply the same principles as the culture test, making environmental responsibility a requirement to access public funding rather than a voluntary action or aspiration. This approach could help shift environmental sustainability from the margins of selective funding into mainstream production financing model, by aligning environmental objectives with incentives that will create the most impact on industry behaviour.

3. Comparative approaches

The UK's reliance on voluntary compliance creates a gap between ambition and outcomes, especially when the metrics and measurement systems themselves are compromised. Despite the disadvantages of a largely voluntary approach, the UK's concentrated, systemic approach has certain advantages over, for example, the complex picture on the European continent. Across Europe, there are numerous carbon calculators, certification systems, sustainability guidelines, and

green production protocols, many of which use different methodologies and standards. While this demonstrates growing awareness, it has also created confusion and inefficiency. For example, in Belgium, a domestic production may need to use a mix of national, regional and local calculators and certification systems, the logic of which, when extended across the EU's 23 members, becomes overwhelmingly complex (Vaughan and Kääpä, 2023). Thus, environmental efficiency gains may lead to increased bureaucracy rather than reduced environmental impact. Because of the heavy commercialisation and wide-spread proliferation of these approaches, sustainability risks becoming compromised as a management or branding exercise rather than a meaningful environmental intervention.

Thus, while in comparison to the UK, the EU may have more diversity, this is also something of a Catch-22. Too many calculators and overlapping systems may lead to avoidance of engaging with sustainability management due to the overwhelming administration requirements – a problem captured well in the European Screen Agencies (2025) table. While a direct comparison with the UK is unproductive (due to the scale of differing approaches throughout the EU), the EC has commissioned a 'common' CO2 calculator that applies to all European productions (but this remains in commission phase in 2026). However, this type of centralisation can have the opposite effect to the fragmentation argument as it can lead to unproductive homogenisation of standards in ways that do not meet specific on-the-ground conditions and requirements. Currently, productions face inconsistent regional requirements, a more balanced approach between EU, regional, national and local standards is required that is mindful of accepted benchmarks but allows for sufficient flexibility for the granularity of practices and standards.

Financial incentives are another means through which European organisations are embedding sustainability into productions. Europe already offers a wide range of tax incentives and rebates to attract international productions, with rates varying from approximately 25% to 40%. Currently, only a small number of countries explicitly connect these incentives to environmental sustainability. Austria's

FISAplus scheme adds a 5% green filming bonus on top of a 30% base rebate. To access it, productions must have a Green Filming Officer, a Green Commitment signed, and CO2 targets set and tracked using the Evergreen Prisma calculator (a tool developed by the Lower Austrian Film Commission). Mandatory operational measures cover every dimension of a production: mobility rules prohibit air travel where a train journey is feasible and require carbon offsetting for unavoidable flights; energy policy mandates connection to the grid wherever possible and prohibits disposable batteries; catering must be at least one vegetarian day per week and avoid all disposable packaging; art department materials must carry FSC certification and exclude a specified list of harmful substances; and waste must be separated for municipal disposal.

Austria's Ecolabel system is one of the strongest models because it combines mandatory auditing, sustainability plans, evidence collection, and on-set verification conducted by independent auditors. Accordingly, voluntary incentives alone are insufficient, argue Kääpä and Vaughan (2024): sustainability financing should evolve from optional bonuses into mandatory funding conditions via dedicated green production grants through European organisations like Creative Europe and Eurimages, mandatory sustainability criteria for public incentives, and financial penalties for productions that fail to meet environmental standards. Furthermore, while many European productions claim to be sustainable, there is often little independent confirmation that meaningful environmental improvements have occurred (Jayaraj and Ghodt 2024; Kääpä and Vaughan 2024). Existing recognition systems range from self-reported checklists to more rigorous third-party audits, but there is no consistent European-wide framework. Portugal's sustainability incentive schemes, for example, allow productions flexibility in selecting consultants and tools, but the absence of standardised verification creates risks of weak oversight. In contrast, much like the Austrian approach, Italy's Green Film Protocol similarly incorporates both documentation review and on-site inspections to verify compliance with sustainability commitments.

Perhaps the most advanced of these frameworks is Germany's Federal Film Fund / German Motion Picture Fund (Green Shooting Workgroup 2024) which has embedded ecological standards directly into the conditions of access for its federal film funding and, vitally, making sustainability compliance a baseline requirement for a 30% rebate. Productions must employ a Green Consultant, calculate planned emissions using the MFG/Sesam CO2 calculator before shooting, and submit a carbon footprint report upon completion. The 22 mandatory requirements span energy (certified green electricity at all production and post-production sites, mains power as the default with generators restricted to genuine off-grid necessity), transport (no domestic flights where the train journey is under five hours, a minimum proportion of low-emission vehicles), accommodation and catering (at least 50% of accommodation with verified environmental measures, food of regional origin, strictly vegetarian menus once a week), and materials (FSC-certified timber, recycled paper, second hand costumes checked first, waste separated across all sites). Some requirements, including the proportion of electric vehicles and on-location lighting standards, are set to tighten over time, building a trajectory toward more ambitious standards.

3.1 Localised and discretionary schemes

Automatic tax incentives schemes, as part of the uplift model, provide only a part of the picture as there are several localised and discretionary schemes that do not fall under tax incentives. These include national and regional awards, grants and loans that play an important role in how sustainable production is encouraged. Some examples below outline their potential:

France's AFNOR Spec 2308 offers a tiered certification model with three progressive levels of commitment, from a basic responsible approach to a production-wide sustainable methodology. From 2026, productions achieving Level 2 certification will automatically receive the CNC's Prime RSE+ grant of €28,000 which is a flat-rate incentive that turns voluntary achievement into financial reward.

The Nordic Ecological Standard operates voluntarily but can be adopted as a requirement by individual Nordic funding bodies and broadcasters. Its 23 mandatory requirements closely mirror the German standards, with some notable additions: public transport for audience participation and extras, a more demanding vegetarian catering requirement (at least half of all shooting days, rather than one day per week), and a mandatory biodiversity protection plan when filming in protected or sensitive ecosystems.

Italy's Green Film Rating operates as a voluntary certification scheme with a maximum of 65 points available across categories including energy saving, transport, catering, materials, social sustainability, and communications. A minimum score of 25 points is required for certification, which can in turn unlock regional funding bonuses. Productions registered under the EU's EMAS environmental management scheme receive a five-point reduction in the minimum threshold.

Other examples with novel approaches include Flanders Film Fund (VAF) offering a discretionary bonus which positions green filming as an additional criterion of production support rather than a separate environmental obligation. Its key intervention is in attaching sustainability to funding as this encourages producers to treat ecological practice as part of normal production management. Screen Ireland's Sustainability Advisor initiative works in a similar direction, but through providing targeted advisory support rather than a monetary bonus mechanism. Its focus on carbon calculators, reduction plans and sustainability advice embeds environmental expertise directly into the production process.

Together, these schemes show how screen agencies are using financial incentives to operationalise sustainability at the level of everyday production decisions. They also indicate a broader policy movement in which green filming is becoming a condition of professionalisation, accountability, transparency and access to public support in ways that could offer the UK pathways to build stronger financial and training support for sustainable production.

What is evident from all these examples is that sustainability in European film policy requires coordinated action across governments, industry bodies, funding organisations, and production companies. They emphasize that sustainability needs to be integrated into the fundamental structures of financing, production planning, training, and reporting rather than remaining an optional or symbolic activity. Furthermore, it is clear that a unified EU wide approach would be very challenging in practice and, in contrast, more granularity and specific engagement with local and regional conditions is entirely necessary. While the European market and industry may share co-production and financing networks (and while global streamers may sometimes perceive them as homogenous), local specificity is paramount for a functioning approach.

3.2 Globally integrated sustainable production

Other case study examples (based on Olsberg's Global Sustainability Index) provide insight into these dynamics and provide more comparative material to evaluate the positioning of UK film policy frameworks. It is productive to bring up a few examples of these global frameworks as they underline the inherent contradiction which is to do with a system that incentivises mobile production but then claims to offset the emissions and other environmental impacts from such production activities with sustainability incentives (as in the Austrian case). If the system is inherently flawed, then another approach to a more efficient use of incentives needs to be developed.

A potential point of comparison for a UK model is the São Paulo's Film Attraction Program which offers productions a base rebate of 20% (subject to a cap), with the possibility of a further 10% uplift tied to a range of social and environmental criteria (including rationalisation of materials use, sustainable transportation and accommodation choices, responsible catering, waste management, and communications practice). Notably, the programme also allows productions to offset their carbon emissions through the city's own municipal carbon credits (generated from local clean energy initiatives). The 10% social/environmental uplift and the municipal credits provide a distinct variation with potential for regional UK adaptation.

Another model based on a sustainability-related uplift is New Zealand's Screen Production Rebate which is built around a 5% uplift available based on six areas, of which sustainability is one. To qualify, productions must submit a sustainability action plan (with pre-approved toolkits such as BAFTA's Albert, Greenlit, and the Sustainable Production Alliance's Green Production Guide giving productions flexibility in how they measure and report) and report on their carbon emissions across a comprehensive range of sources: transport and travel, accommodation, energy, generator fuel, freight, catering, waste, and materials. The programme stops short of mandating a dedicated sustainability officer or third-party carbon verification, though both are encouraged and accrue additional points toward the uplift.

3.3 The positives and negatives of financial incentives

In both the São Paulo and the New Zealand cases, a 5-10% uplift is certainly an attractive incentive that ensures that sustainability ceases to be a reputational preference and becomes a budget line item. However, uplift percentages may be insufficient to shift behaviour at scale. A 5% or 10% uplift, while welcome, may not represent a large enough financial differential to drive the kind of structural change which would include fleet electrification, on-location grid access infrastructure, wholesale supply chain reform that deep decarbonisation requires.

Forward planning is key by building in phased and escalating requirements such as Germany's approach of flagging requirements that will become more stringent over time (for example, the proportion of electric vehicles, the share of vegetarian catering) allows the supply chain and production workforce to adapt ahead of mandatory change. The most sophisticated schemes address every dimension of a production's environmental impact: energy, transport, catering, materials, waste, and post-production. This comprehensiveness prevents greenwashing, where a production might, for example, switch to LED lighting while continuing to fly its cast internationally. Finally, carbon offsetting integration, as in São Paulo, connects productions to local green economies.

The sheer volume of requirements - Germany has 22 mandatory measures, Austria requires detailed CO2 target and actual balances, a Green Commitment, and a signed producer statement - creates significant compliance costs. For lower-budget independent productions without dedicated sustainability staff, navigating these requirements can be disproportionately costly and time-consuming, furthermore, inconsistency across territories creates a fragmented landscape. Each scheme operates with different criteria, different calculators, and different thresholds, making it difficult for international co-productions to navigate compliance efficiently. A production spanning Germany, Austria, and Italy must, in principle, engage with three different frameworks and three different carbon measurement tools, despite significant overlap in their underlying requirements. Furthermore, carbon calculators and reporting methodologies vary and thus compromise data benchmarking and transparency**.** Even within schemes that mandate carbon reporting, the choice of calculator and the scope of emissions covered differ. New Zealand offers three approved calculators; Germany and Austria use different national tools. Without a single harmonised standard, aggregate industry data remains difficult to compare and verify, and the risk of inconsistent or optimistic reporting remains.

A further complication is that geocultural assumptions do not align with practical realities. The requirement to avoid air travel in favour of trains under five hours, for example, is straightforward in densely connected Central Europe but less applicable in regions with limited rail infrastructure. Similarly, the assumption that grid connection is always preferable may not hold in countries where the national grid is predominantly coal powered. When they do operate well, as in Germany and Austria, they provide a comprehensive, measurable framework that integrates environmental responsibility into the economics of production from the earliest planning stages. At its weakest, it risks creating compliance theatre: productions ticking boxes, claiming uplifts, purchasing offsets, and filing reports without materially reducing their footprint or their environmental capabilities.

The most promising direction is toward mandatory, harmonised, and progressively ambitious standards backed by sufficient financial incentive to

make deep changes through economical rationality. The voluntary frameworks now proliferating across France, the Nordics, and Italy are valuable proving grounds, but they will need to harden into requirements if the industry is to meet its climate commitments.

4. UK gaps, challenges and solutions

4.1. Policy gaps in the UK

The UK situation is understandably less fragmented than continental Europe but considering the leading role the UK continues to play with the cross-border adoption of albert as an international standard, it is necessary to evaluate the ways that similar concerns pervade the status quo. The below discusses some of the most damaging complications, especially as pertains to policy:

4.2 Compliance gaps

While BAFTA albert requires calculation, evaluation, reporting and some mitigation of production emissions, carbon-intensive ongoing reality television productions such as *Strictly Come Dancing* or *The Traitors* continue to have high energy use, despite the adoption of sustainability certification and visible measures such as LED lighting upgrades or reduced single-use plastics. Such practices do not fully account for the scale of spectacle required for their production, including energy-intensive studio operations. BAFTA albert and other documentation either spotlights television shows that can demonstrate their gains (such as *Race Across the World* and reductions in crew travel) or have smaller footprints (T*he Great British Sewing Bee*) than these more intentionally high-end shows. Such practices highlight that measuring and reporting emissions does not guarantee reducing them. Clearly, awareness of these limitations is there as the ACCELERATE sustainability framework, for example, concedes that much more needs to be done.

Incentivisation areas could focus on reductions (as recommended in Kääpä and Vaughan 2024; XR Stories 2024) as in the Austrian case, but these need a more quantifiable and actionable decarbonisation compliance structure (beyond what BAFTA has already instituted). Furthermore, the UK industry is divided into

domestic and in-coming productions, with sustainability investment via automatic incentives for in-coming productions far outweighing that from selective incentives for domestic productions (BFI 2024). A key point is that there is no environmental requirement attached at all for most automatic incentives as these incentives are automatic and administered via the tax code. Therefore, there is no application process and no environmental or sustainable application or requirement, and they may – or may not - choose to do so via self-regulatory frameworks like that of the SEA. In applications for selective funding, a sustainability plan is now a criterion both for UK funding from the BFI as well as from the devolved national and regional screen agencies. However, beyond this initial plan and an end of project report, there are no obligation to adhere to this plan after the initial application phase, nor are there repercussions if the plan or report's criteria is not met (Noonan and Sørensen, 2022).

4.3 Infrastructure constraints and challenges

As indicated above, the UK's heavy reliance on incoming US productions (see Vaughan 2022) is another major challenge that can lead to a complex meshwork of standards and practices. While companies like Neptune International and Leverage Point act as local sustainability coordinators, US-based studio productions come with their own measurement tools and metrics and often use PEACH and PEAR. While the Sustainable Entertainment Alliance mediates between these different spheres of production, international franchises with key production bases in the UK, such as Marvel productions or the Mission: Impossible series, operate across multiple countries, limiting the influence of UK policy on their productions. Such perspectives highlight the challenges of regulating a global industry.

As the UK's studio infrastructure is increasingly geared towards catering for incoming streamer productions, concerns highlight the large carbon footprint of global filming arrangements, with companies like Netflix arguing they are achieving net zero emissions, but where the prevalent use of offsetting enables them to claim this without substantial reductions in production emissions. Studios such as Pinewood and Elstree have improved sustainability practices, but reliance

on transport systems and supply chains outside the remit of the studios themselves remains a concern. Under these conditions, infrastructure limitations constrain policy effectiveness.

Finally, policy focuses on production emissions emanating largely from scope 1 (what happens on the production) and 2 (the supply chain), but often sidelines scope 3 (everything else), not unsurprisingly. The emissions from streaming impacts (including complex multi-stakeholder processes such as encoding, content delivery networks, storage of vast libraries and user devices) include components such as data centres, service providers, integration of technologies such as AI, infrastructural emissions, and user and audience consumption. Such concerns continue to be under-addressed and consequently need a more responsive, granular approach.

4.4 Transparency and data challenges

For policy to make a tangible impact on practice, more accurate data practices are required. According to the ACCELERATE framework, the UK's total reported emissions fell from 210,598 tonnes in 2023 to 174,437 tonnes in 2024 (BAFTA 2025), but the total of productions reporting their emissions fell as well. Thus, such obfuscations lead to questions over the directions taken in the industry, especially as the tangible decreases in emissions and the balance they have in being part of a wider macro level reporting mechanism are confusing. This is evident in the ways that the industry promotes these advances, but zeroing in on tangible practice is more challenging. The lack of transparency in data reporting is one barrier to building a more accurate picture. BAFTA hosts much of the data required but most of it is under NDAs creating a proprietary data silo. As a result, there is no comprehensive public database of emissions, which is limiting for accountability and the ability to track progress toward net zero. Furthermore, there are no current studies of the impacts of green labelling internally or externally to the industry.

4.5 Social challenges

If we take an ESG (Environmental, Social and Governance) approach to sustainability, it becomes evident that, from the perspective of governance, voluntary incentives based on minimal financial or other operational prods provide the most obvious obstacle to transformations. A myth in sustainable production is that smaller productions are somehow more sustainable. Yet, evidence from SEA, Netflix and other major operators suggest that large productions can afford sustainability teams and infrastructure, while independent films such as those produced in Cornwall (see Goodman and Moseley; forthcoming) face proportionally higher challenges. Such structural differences can risk reinforcing inequality within the sector.

In addition, sustainability roles are often freelance and lack authority, creating 'responsibility without power'. Sustainability becomes dependent on individuals rather than embedded systems and provides a challenge for practical and institutional memory when talented crew migrate from one production to the next and only centrally produced guidelines persist (see our other PEC paper).

4.6 Technological solutions

AI technology provides another layer of complexity as its environmental costs have been well-documented (including prominent discussion of the impacts of projected UK investment in AI data centres). However, as one of the key challenges for the film industry's sustainability problem is data and coordination of scope 3 emissions, and as there is fragmented information across productions, departments, locations, and vendors, with few adequately calibrated systems connecting them, emerging AI logistics and management tools may be suitable for performing some of these tasks (see Carbon Trust 2026). AI is particularly well-suited to this type of integration challenge as an AI-driven carbon tracking and scheduling tools that work across an existing production management system would address many of the concerns relating to scope 3 and both the up- and down streaming of content

From a policy angle, this is more complicated since much of the data pertaining to scope 3 is outside of not only the companies producing the content, but also any jurisdiction that UK legislative authorities may have.

4.7 The responsibility deficit

All of this amounts to a general proliferation of oversight and responsibility that do not map readily across governance lines. Kääpä and Vaughan (2023) have argued that the film and TV sector is undermined by a responsibility deficit when it comes to environmental governance. Is the coordination of sustainability guidelines, policies, financing, and ethical concerns in the film and TV industry the remit of an environmental or a cultural ministry? In reality, it overlaps the jurisdictions of both but can lead to an easy marginalisation of environmental issues due to lack of clarity.

The sustainability responsibility deficit is likely to be exacerbated by the wide-spread adoption of AI into industry workflows and production cultures. The UK Parliament in November 2025 suggested that AI is already regulated in the UK through a context-specific approach, meaning existing sector regulators (the FCA, ICO, CMA, and OFCOM) who each oversee key parts of the AI governance compound (instead of a cohesive framework). Yet, some suggest that the Labour Government's AI Action Plan promotes AI innovation instead of safety and regulation (Bird & Bird). The challenge is to locate an appropriate remit in these context-specific approaches that would apply to film and TV. Accordingly, in description and practice, the FCA would focus on, for example, the use of AI in financial transactions; the ICO on matters of data; the CMA on ownership and political economy; OFCOM on online safeguarding). Perhaps, the most relevant regulator would be OFGEM, but their focus has largely been on the use of AI tools in energy markets, not so much on AI's impacts on the environment, or scaling up its sustainability uses. Mapping these to a specific cultural industry is even more complex.

Thus, industry bodies like the SEA or BAFTA albert self-regulate but without the authority or the tools of a governmental ministry or an intergovernmental body.

Hence, their recommendations, despite appearing to be mandatory and enforceable, are undercut by questions over efficiency and lack of established standards.

4.8 Money and power as the binding constraints on a sustainable UK screen sector

To address these concerns, the PEC Sustainable Screen Industry Network convened an industry–academia workshop (University of Warwick, February 2026) to map the policy gaps standing between the UK film and television sector and a credible sustainability transition. The workshop addressed four recurring themes:

- Business-as-usual: sustainability is too often driven by green PR and financial incentives rather than the genuine in-setting of better practice.
- ESG risks: environmental and financial priorities routinely crowd out the social pillar: fair pay, secure jobs, access and inclusion, community impact need to be prioritised
- A changing landscape: policy struggles to keep pace with shifting technology, financial realities, cultural concerns, and user habits, leaving a patchwork of voluntary and discordant approaches.
- Sectoral alignment: international, national, regional and local frameworks sit awkwardly across the many layers of the production ecosystem.

Underpinning the identification of each theme were four key questions: whether to mandate or incentivise, when to permit self-regulation, how to localise, and where government is (and is not) needed. These questions were eventually distilled into two foundational concerns through extended workshop dialogue with our industry participants: money and power.

Money - the sector's prevailing levers are financial. Where sustainability is pursued through incentives and voluntary guidelines rather than mandates, the decision to act rests with whoever holds the capital. The field is shaped unevenly as the current baseline data and methodologies shaping what counts as evidence, and which justify policy formulation, are themselves funded by

industry, third parties and consultancies. The social dimension of ESG is consistently deprioritised because it carries no clear financial return, whereas environmental gains can be monetised as green branding and PR efforts. Thus, in a fragmented, freelance-heavy production economy, the human costs of unsustainable practice fall on those least able to absorb them (see the distinction between global streamers and small production companies struggling to adapt sustainability guidelines).

Power - These questions, and the financial decisions made, are, at root, about authority: who sets the rules, who defines the baselines, who is visible, and whose interests count when trade-offs are made. Fragmented, multi-level governance means no single actor can compel change, so progress depends on those already positioned to set the agenda, who are typically the largest, best-resourced players (i.e. US-based studios and global streamers).

Ultimately, money and power are circular, intertwined aspects of the same problem: financial leverage confers agenda-setting power, and those with power design the financial mechanisms. The social costs of an unsustainable screen industry persist as they are expensive to address and lacking a powerful constituency at the table. In short: it all comes down to power and money. A credible sustainability policy for UK film and television will have to confront both directly, including deciding where mandates must replace incentives, and ensuring that those who bear the costs of transition also have a genuine seat in governing it.

A workshop with industry leads, sector leads, arms-length bodies, policy makers, sustainable consultants and academics at the University of Warwick identified money and power as the twin drivers of sustainability transformation in the UK screen industries as shown below:

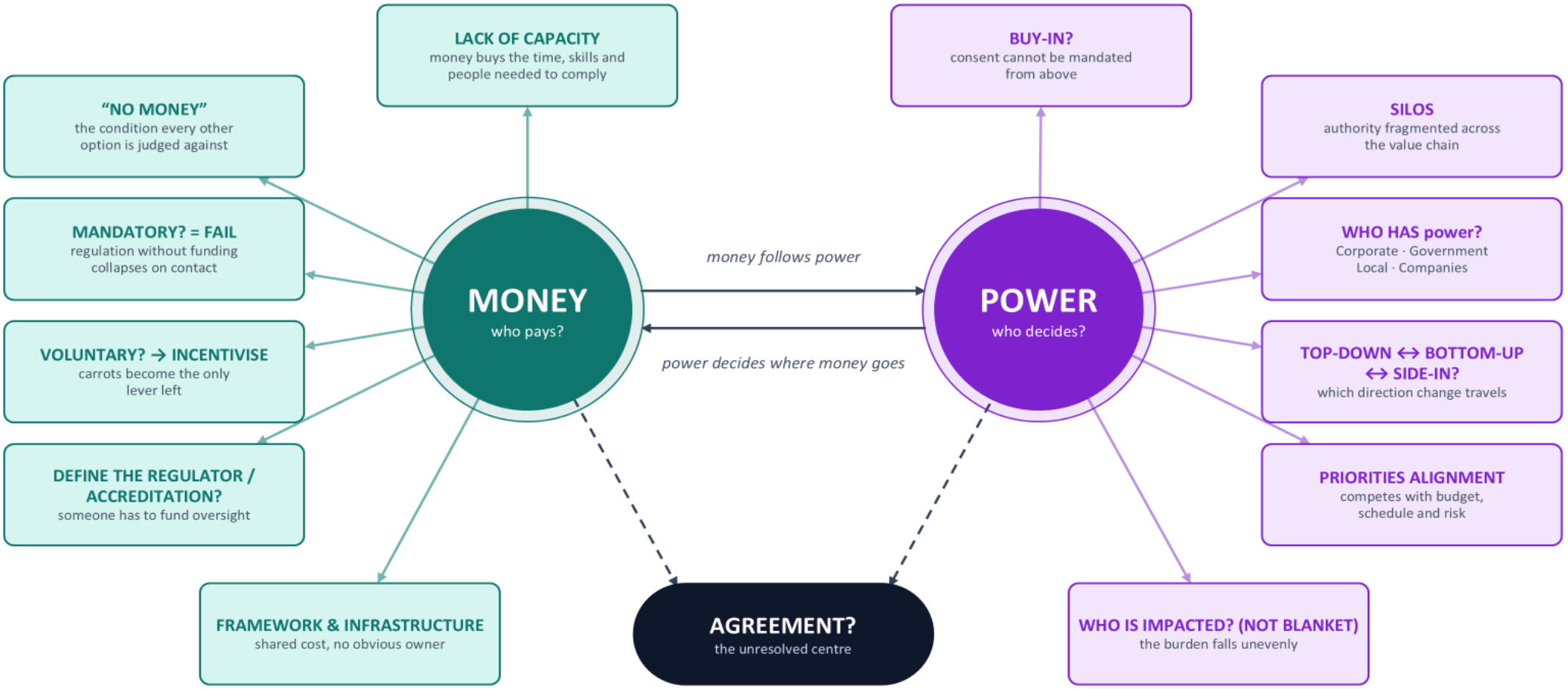


Figure 1. Synthesis of workshop whiteboard capture

4.9 Intervention

If money and power are the main obstacles to more equitable sustainability governance and implementation, then a more responsible UK approach must start from addressing them in an unblinkered and realistic way. BAFTA albert has in many ways been intended as a cultural transformation, designed to implant sustainability into film/TV production cultures. It continues to act as a viable framework for changing intra-industry cultures through (largely) voluntary mechanisms but is in many ways compromised as a policy framework (and not something that attempts to speak to – and leverage – consumers). This comes from its multilayered position where it attempts to cater for both in-coming productions (with their own guidelines and industry lobby in the form of SEA) and domestic SMEs that must abide with these guidelines with little resources to spare (such as BBC's requirements for all productions to report and act on sustainability).

In addition to an uneven playing field, such discrepancies are exacerbated by an obfuscated approach to data and transparency. While the UK benefits from a comparatively unified approach to guidelines, a fundamental challenge is the ways they increase quantification (and abstract metrification) which leads to sustainability being an administrative approach. While this is entirely necessary for these initiatives to work in the first place, they can also be counter-productive due to their focus on administrative process and reporting, which again are something that falls in unfair ways on SMEs and freelancers struggling to do the 'day job'.

Money: This policy discussion paper thus suggests that a more effective and responsive policy framework needs to be developed that exceeds the regulatory power of self-governing institutions. It is worth considering tax incentives such as the Austrian Film Institute's 5% tax incentive to provide a commercial, competitive incentive for the UK (national/regional/local). At the same time, such incentives need to avoid a race-to-the-bottom regarding loosening standards in lieu of commercial competition (especially in relation to SEA plus Netflix approaches).

Power: A key question to ask is if the UK approach can maintain its sectoral expertise in sustainability management but also use the international positives to develop a more effective approach. Can the UK measures be more than financial but also capacity building; talent and skills? Here, the UK could look at Germany's regulatory approach to adapt key measures for a more binding strategic governance framework with a long-term view.

4.10 An 'environmental sustainability test'

A recommendation from this report is to add an equivalent of a cultural test (which is a requirement for accessing tax incentives in the UK) but for environmental accounting: an 'environmental sustainability test'. Other locations competing for incoming productions, such as Austria, can explain how this environmental sustainability test might be initiated. Austria has leap-frogged the UK by offering a its 5% green film funding on top of its 30% production incentive, making it not only attractive to film in Austria but also to showcase the attractiveness of carbon calculations and the minimum ecological standards set by Evergreen Prisma - Competence Centre for Green Filming and the Association of Green Film Consultants Austria (VGFCA) (Green Filming 2023).

The scheme represents a more robust and collaborative framework for sustainable production because it combines financial incentives with mandatory environmental requirements, independent verification, and cross-sector coordination. Unlike approaches that rely primarily on voluntary reporting, the Austrian model incorporates auditing, evidence collection, and on-set verification, creating greater accountability. In doing so, it brings together producers, sustainability specialists, funding bodies, and auditors within a shared framework that embeds environmental responsibility throughout the production process rather than treating it as a standalone reporting exercise. This model clearly shows how a stronger link can be established between environmental ambitions.

The Austrian model is particularly relevant to the UK because it demonstrates how environmental criteria can be integrated into production incentives without replacing existing support mechanisms. While the UK's production tax relief

system already uses a Cultural Test to determine eligibility, Austria illustrates how a similar environmental framework could be attached to incentive schemes through minimum sustainability standards, carbon reporting requirements, and independent auditing. The most transferable elements are not necessarily the specific ecological criteria themselves, but the principle that access to public incentives can be linked to measurable environmental performance. Such an approach could be considered to move sustainability beyond voluntary certification and reporting, embedding environmental responsibility more directly within the economic and financial structures that shape production decisions.

There are of course other related elements to the broader picture of sustainable production. Training, education and skills, and consumer awareness are examples of these broader areas which could also be linked to incentives, policy frameworks and public – private collaborative agreements. Whilst these are important, they are similarly complex and as such sit outside the focus of this paper which is more fundamentally focused on creating practical changes to on-the-ground production which can then be expanded to provide support and facilitate wider initiatives.

5. Conclusion

This document has outlined the current advances and gaps in the existing UK provisions, explored European advances, contextualised them with approaches taken in diverse globalised contexts, and finally positioned them in relation to industry realities, aspirations, management and governance. The UK has built a strong sustainability framework that in many ways functions as an international model for how to nudge the film and TV industry into a more sustainable approach. Yet, the gains it provides are incremental and limited in their efficiency. Achieving net zero will require deeper structural changes beyond minor efficiency improvements, reliant on industry goodwill, and subsequent reputational management of their arguable impacts.

All of the contemporary developments (for 2026) in improving sustainability performance, from ACCELERATE to SPARK, offer recognition that voluntary

certification has not been as impactful as it could have been in decarbonizing the industry. The range of discussion surrounding them suggests that a more focused industry-wide commitment is needed but the current drive remains a voluntary pledge by the same organisations who already mandated certification which has not, by this logic been fully effective (as more is clearly required). Movements towards a much more binding regulatory approach embed all the key principles of frameworks like SPARK and ACCELERATE are required not only on the immediate production logistics and arrangements but also into the commissioning and contracting processes in a way they have not been required to do with the Carbon Action Plan's energy and material processes requirements. A policy framework with both mandatory obligations and commercial incentivization would address challenge of power and money in ways that plays to industry realities and provides a pragmatic response.

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