

Decarbonisation of the Public Sector – a Call for Evidence.

Summary of Responses

Overview

In July 2017, the Cabinet Secretary for Environment and Rural Affairs called for the Welsh public sector to become carbon neutral by 2030. We published a call for evidence to seek information from interested parties about how reaching carbon neutrality could be reached.

Thirty three responses were received to the call, mainly from organisations within the public sector. A number of sector organisations, private companies and individuals responded, and we are grateful for all of the evidence provided. We are now publishing this summary of the responses received. We asked seven questions in total, and responses received to each question are summarised below.

Q1. The ‘Public Sector’ can be defined in many ways. Can you provide evidence to suggest one definition may be more suitable to achieving our aims or would deliver a particular economic, social or environmental benefit to Wales?

Two suggested definitions featured heavily in responses; the definition used to include organisations within the Well-being of Future Generations (Wales) Act, and the definition derived from the Freedom of Information Act which was used as part of the Energy Performance of Buildings Directive implementation. Both were recommended as they are well known and embedded in the operations of organisations likely to be caught by the definition.

A number of responses indicated the definition should include bodies funded in some way by the Welsh Government, with examples including Higher Education, Town and Community Councils, Cardiff Airport and recipients of grants and contracts. A number of responses noted these organisations should commit voluntarily to meeting the commitment. Further voluntary participants were suggested by responses advocating the definition within the Well-being for Future Generations (Wales) Act. The Act has established Public Services Boards (PSBs) for each local authority area in Wales. Each PSB must improve the economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals. Each PSB has statutory members drawn from the area: the Local Authority; the Local Health Board; the Welsh Fire and Rescue Authority; and the Natural Resources Body for Wales. A number of responses suggested non-statutory members of PSBs (invited participants) could also be encouraged to voluntarily sign up to the ambition

Q2. What evidence can you offer to suggest the headline target of a carbon neutral Public Sector by 2030 is insufficient, appropriate or too challenging? This question may be best answered by referencing your response to Question 1 and considering the benefits and challenges with such an approach.

Almost all responses indicated the headline target would be challenging to achieve, but it was welcome. A number of responses sought greater clarity of what was meant by carbon neutrality, and it was noted ensuring all carbon emission sources were included in the definition was challenging to ensure carbon neutrality was achieved.

A number of responses highlighted achieving this target would require incentives, penalties and support, and may require specific legislation to ensure it was given sufficient impetus for delivery.

Q3. We believe great benefit to Wales will be achieved should the carbon neutral Public Sector ambition cover all scopes of emission. You may however believe a reduced scope should be used. We would like to hear your views and see supporting evidence in your response.

All responses supported including scope 1 and 2 emissions. There was widespread support for including scope 3 emissions, but this was widely noted as being difficult to define, control, manage and ultimately achieve savings within this scope. A number of responses called for some support to standardise the definition of scope 3 to aid organisations to achieve reductions here. There were a number of further suggestions scope 3 should either be outside of the target, should be introduced incrementally or should be included following further study of how the target would be defined, controlled and monitored.

Q4. In setting out our intent to monitor progress, there are options for how this can be best achieved. What evidence do you have to suggest one approach is likely to be more successful than another?

There was some variety of responses to this question, however all indicated a need to utilise existing methods and activities where possible, to reduce complexity and overhead costs.

Responses recommended any solution should work alongside the Carbon Reduction Commitment (CRC) and European Union Emission Trading Scheme (EU ETS) arrangements some organisations are subject to already. Whilst there was a recognition these reporting arrangements were not applicable to all organisations

likely to be included in the ambition, it was felt there was sufficient knowledge across Wales to be able to increase capability of others easily.

There was an alternative view there was a good fit with the statutory duties of the Public Service Boards, whose arrangements include reporting on well-being objectives, statements and plans.

Another view expressed was the need to ensure consistency with any future carbon budgeting arrangements, with clear, common and consistent data services required.

In terms of methods, it was noted the Greenhouse Gas protocol, ISO14001 (scope 1 & 2) and ISO14064 (scope 3) already provide some standardisation.

Q5. If monitoring is introduced, it enables the ability to set interim targets. Do you think interim targets would be useful? If so, would interim targets cover all scopes, be mandatory or voluntary? Would interim targets be annual or is it more prudent to set fewer interim targets? Can you offer evidence to support your views?

There was widespread support for interim targets in the responses received, arguing they would help to ensure progress is achieved towards the overall goal, and help to measure progress along the way. A number of responses suggested interim targets could be applied to scope 1 and 2 emissions, but be voluntary or introduced incrementally for scope 3.

Many responses called for interim targets to be set on a multi year basis, with recommendations of both 3 yearly and 5 yearly commonly made and a strong preference to dovetail with existing reporting arrangements. The views were expressed due to a recognition of the multi year nature of the projects needed to reduce emissions, the need to avoid year on year gaming of statistics and the need to avoid overly burdensome reporting. Responses did note interim targets alone would be insufficient, without appropriate governance, finance and framework to deliver the projects needed to meet them.

Q6. A great number of actions will need to be implemented by the Public Sector to deliver our decarbonisation aims. Can you provide evidence of which actions might be capable of rapidly reducing carbon emissions? If you represent a public body, can you articulate what you have already done? If you represent a service provider, can you offer evidence of how your goods or services can contribute in a significant way to Public Sector decarbonisation?

A wide range of potential areas of early action were highlighted:

- Support around transport fleet decarbonisation
- Better quality training and commissioning of new building capital projects to ensure the energy efficiency performance designed was achieved in real-life conditions
- Action to reduce emissions of purchased utilities
- Potential for heat networks within the public estate
- Public sector wide benchmarking and reduction reporting method
- Support to develop more delivery models for renewable energy projects
- Policy support for grid scale low carbon energy
- Land based carbon sinks
- Lower carbon design of new and retrofit buildings
- Electric vehicle charging infrastructure, storage and on site use integrated with renewable energy projects
- Widespread work with suppliers to reduce scope 3 emissions in procurement

Q7. We have outlined our belief that carbon offsetting or trading will be required for the Public Sector to achieve carbon neutrality by 2030 and this approach offers significant opportunity to drive wider economic and social benefit. Can you offer evidence of where carbon trading schemes have been successfully deployed by the Public Sector?

Responses around carbon trading were varied, with some support. Some responses felt carbon trading of some form, either within the public sector or beyond as an offsetting measure would be essential to meet the headline carbon neutrality target. Widespread caution was offered about the need for trading schemes to be implemented carefully to ensure they do not become perceived as a tax, or fail to drive decarbonisation behaviours.

A number of responses highlighted the potential to offset or trade carbon emissions risks not creating the overall level of carbon reduction needed to avoid the worst impacts of climate change, and risks inequity in the treatment of emissions where trading can be afforded. Used well, it was felt creating opportunities for carbon sequestration in Wales could lead to additionality in creating forestry, with the potential to improve biodiversity.