

Response submitted by email to  
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Dear Public Sector Team,

**Consultation: “Leading by example: cutting energy bills and carbon emissions in the public and higher education sectors”**

Please find below the accompanying information for the consultation response REF ANON-NWJM-13MG-M from the Environmental Association for Universities and Colleges (EAUC).

The Environmental Association for Universities and Colleges (EAUC) is the environmental and sustainability champion within Further and Higher Education. We are a member association supporting Universities and Colleges across the UK. Founded in 1996, we exist to lead and empower the post-16 education sector to make sustainability 'just good business'. The EAUC represents institutions with over 2 million students and nearly 400,000 staff with a spending budget of over £25 billion.

On Thursday, 9<sup>th</sup> November 2017 – we held a webinar with Clare Dalton, Public Sector Policy, Home and Local Energy Directorate at the Department for Business, Energy and Industrial Strategy and over 60 of our members. In this webinar, Clare introduced this consultation and members were able to ask her questions. We followed this with confidential member-only polling, and then sent out an additional survey to our wider membership. The results below have been collated from these surveys and can be understood broadly as reflective of one institution per response. The questions we have asked provide supporting information with regard our consultation response.

A brief summary:

While the majority of our members have said they would be supportive of a voluntary, and indeed a mandatory emissions target, as the figures show below, this is not unanimous. A process of this nature would need a significant amount of external resource dedicated to the embedding of these practices in institutions that do not have the financial or resource capacity to support new measures. There would need to be a clear framework, robust guidelines with regard reporting to ensure data is being measured in the same way, continued engagement with the sector to monitor progress, and fair and enforceable penalties if it were to become mandatory. Provision of tools to enable the calculation of savings would also help to strengthen the business case for carbon reduction. Additionally – skills training for executive level staff about the benefits and necessity of sustainability measures would be useful.

We asked members:

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- 1) What's the biggest barrier for your institution to improve energy efficiency and cut carbon emission?

**57 responses**

Conflicting priorities = 20  
Lack of time/resource = 12  
Low capital availability = 8  
Upfront investment costs = 6  
Length of payback = 6  
Lack of interest in energy efficiency = 2  
Low status of energy efficiency = 2  
Unseen/unexpected costs = 0  
Complex decision chains = 0  
Lack of knowledge = 0

- 2) Would you support a voluntary emissions target?

**60 respondents**

44 Yes  
12 No  
4 Unsure

- 3) Could your institution meet a 30% emissions reduction target on 2009/10 levels by 2020/21?

**53 respondents**

15 Yes  
22 No  
10 Already do  
6 Unsure

- 4) What do you think the target by 2030 should be for Further/Higher Education?

**56 respondents**

20% - 1  
30% - 3  
40% - 8  
50% - 19  
50%+ - 20  
Unsure - 5

- 5) Would you support a mandatory target?

**59 respondents**

45 Yes  
10 No  
4 Unsure

- 6) Do you think a mandatory or a voluntary target would motivate further and higher education the most?

**13 respondents (The respondent rate was low here as it was not asked on the initial survey)**

9 Mandatory

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1 Voluntary  
2 Neither  
1 Unsure

7) Have you experienced any barriers to accessing capital finance for energy efficiency? (multiple choice)

**53 respondents**

Complex decision chains - 43%  
Upfront investment costs - 16%  
Borrowing regulation or limitations - 15%  
Lack of capital finance - 10%  
Capital expenditure limit - 5%  
Estate rationalisation plans 4%

8) How do you currently finance energy efficiency?

**55 respondents**

Capital funds - 46  
Invest to Save fund - 11  
Public Works Loan Board - 0  
Condition Improvement Fund - 6  
Salix finance - 34  
Private finance - 0  
Public/Private Funding Combination - 3  
Energy Performance Contracts - 5  
European funding – 3

9) What capacity and capability barriers do you face in improving energy efficiency in your institution?

**56 respondents**

Complex decision chains - 39  
Lack of time/resource - 38  
Limited internal capacity to manage and deliver projects - 33  
Lack of technical knowledge -11  
Accounting or governance rules - 9  
Lack of business case development experience - 7

10) What further actions would support low carbon and energy efficiency investment in the Further and Higher Education sector's estate?

- Greater leeway with Salix funding requirements. We have to demonstrate savings made, and don't have capacity to monitor energy at present.
- Price of carbon needs to be visible after CRC ends
- Incentivisation and penalties.
- Mandatory targets, More wriggle-room for borrowing - there's real concern about surpassing the borrowing threshold, Ring fenced revolving funding, Higher targets
- High carbon price tax
- Mandatory target to ensure that carbon reduction is taken seriously and the required funds are made available to invest in energy efficiency measures within the University
- Formal cross over/partnership working with local authorities- for example links to air quality targets.

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- Energy efficiency regulations / mandatory reporting and targets. Rewards Coherent government policy with carrots and sticks More accountability on the senior team, eg VC level
- Proper incentives & penalties that capture the attention of VCs & DoF
- More ownership from senior managers VC's etc
- Simplification of government initiative application process. Aligning of reporting periods
- EAUC leadership
- Stronger message/incentives for governing bodies, VCs etc...
- Indication of long-term commitment to consistent policy approaches
- Grant funding support for poorly adopted but proven technologies, e.g. for the uptake of heat pumps. BEIS' current innovation fund is welcome, but is focussed on bringing new technologies to market, rather than also encouraging the update of poorly adopted solutions. Certainty on long-term Government policy is crucial to support investment. Changing Gov policy has already directly impacted a number of projects that were being lined up for implementation. This creates a feeling of reticence to consider new solutions.
- Business case support Mandatory targets Access to technical knowledge
- More linkages with academic activities and priorities / included in teaching / more requirements from funding bodies for carbon reduction to be a priority
- Ability for universities executives to connect Capex and Opex in a sector and financially constrained environment
- Support at Estates, EAUC and AUDE level is great, but it needs to be more of a priority at the most senior level
- Mandatory targets- financial penalties
- Better sustainability knowledge from University Boards
- Mandatory requirement
- Funding
- Additional Resources.
- HEFCE type funding for refurbishments, not new buildings.
- Greater financial support/incentives from central government.
- Mandatory targets. Longer pay back periods for loans e.g. salix, student pressures/demand
- Clarity of government intent
- Improvement opportunity identification support - e.g. free energy auditing to the sector.
- Support for Finance Directors to understand the Salix funding scheme
- Mandatory targets
- Higher utility prices / carbon price
- Easy access to funds. More mandatory resourcing of the area.
- Bespoke targets for individual institutions dependent on growth plans
- Having mandatory targets in place
- Properly priced carbon
- Driver from government.
- Support the EAUC consultancy projects to provide high quality evidence, narrative and business cases!
- Putting a cap on estate growth. Pushing the Government to further reduce carbon emission intensity of the National Electrical Grid.
- Support for step-change projects, firsts etc
- Financial penalties for not hitting targets Focus on life cycle costing rather than up front capital cost
- Due to the rate of development (90% increase in m2 2005/06 to 2016/17) and the planned further increases having higher building regulation would have made/will make the biggest difference.
- Availability of Salix funding in Northern Ireland
- need grant for higher capital cost of say biomass over gas heating

- Short term target only helpful for bringing the slow-coaches along. For those of us who are already working seriously on carbon reduction targets a longer term, more ambitious target would be more productive - a mandatory set of 2 year rolling targets leading all institutions to carbon neutral including scope 3 by 2055? Mandatory minimum target, with higher targets incentivised for institutions who are able to be aspirational (although relative rather than absolute targets will always be more achievable for institutions which are rapidly growing). For Universities with rapid growth would carbon offsetting be a sanctioned route to meeting targets? Penalties for failure would be helpful in the next round of targets because that is how you motivate real institutional-wide change. Would be helpful to see mandatory reporting for Scope 3 in the next round. We need an idea of targets beyond 2020 to maintain longer term momentum. Would be very helpful to have clarity ASAP on inclusion of Scope 3 carbon. Support for staff and student engagement programmes (such as the Students' Green Fund of 2013). Clarity on how the HEFCE target transfers across to the Office for Students.
- The issue needs to be forced. The reduction in carbon so far is embarrassing for a sector that is relatively wealthy and has ambitions to be here for the long term. People are too quick to make excuses, and the sector keeps on getting distracted. The planet is on a ticking time bomb related to carbon and energy, we (as a sector) need to be alive to this and demonstrating that it is possible and financially viable to take big strides towards zero carbon estates and operations.
- Additional sources of funding
- Mandatory requirement for each institution to have a save invest funding. For example saving from utility budgets reinvested in energy saving initiatives.
- A requirement for all suppliers to start providing carbon data and making publicly available so that data is consistent and can be utilised by all. Setting a clear and consistent scope so that the relevant data is reported; there needs to be an understanding on responsibility / ownership where services / buildings are shared.

11) What national or international examples of best practice can we learn from?

- Scotland
- We Mean Business initiative - fair share of carbon emissions "cake" in order to limit rise in temperature Climate Change Act - 80% reduction by 2050 One mandatory reporting framework, whether that's LIFE Index or another that incorporates carbon /energy reduction for all Unis Madras
- BREAM as a best practice is good all round process and provides an assessment of the current energy efficiency of your new building projects.
- PIXIE Energy are working with DNO's to remove infrastructure and regulatory barriers at the local level. Can provide details offline
- Corporates American universities Fit for the Future network The Crowd- Curve Better Building Partnership GLA
- Top performing Universities (from a carbon reduction perspective) should share (and be celebrated) how they achieved this.
- Private sector successes.
- C40 Cities
- Brown University's maintenance team springs to mind: innovative financing and processes
- Scandinavia
- Scandinavian long term commitment to energy infrastructure and non-for-profit energy companies / Passivhaus /
- Use of Passivhaus standard
- Uni of Reading has delivered 36.3% reduction in scope 1, 2, & 3 emissions, saving >£20m and 72ktCO2 cumulatively.

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- SFC/UoE funded study of best practice in 2016; ISCN awards for low carbon; various good examples from corporate world; don't forget UN case studies; Green Gowns
- Scotland Carbon Act
- District heat schemes in Scandinavia, it is not done at all well in the UK
- Corporate world - e.g. Unilever, M&S. Green Gown Awards winners/finalists.
- SmartSpaces and EDI Net project at DMU (self promotion) around visualising energy usage
- Green Gowns Southampton energy partnership Dorset Green PEA scheme (public/private)
- University of Washington, Seattle Washington
- EU Covenant of Mayors COP21
- Harvard
- Always look towards Scandinavia!!
- Our own Climate Change Act
- Germany. When there is a price associate with carbon, institutions react accordingly.
- River source heat pump in Kingston Upon Thames [http://www.icax.co.uk/Kingston\\_Heights.html](http://www.icax.co.uk/Kingston_Heights.html)
- Germany i.e. more focus on life cycle costs, passivhaus University of British Columbia - test bed experimental focus Aston University - excellent in behaviour change/engagement
- Probably Netherlands attitude to wind power onshore and offshore? Iceland, Norway, Sweden.
- Scotland seems to be doing much better than we are - establish tough regulations/mandatory targets, properly enforce them, establish support networks and guidance, develop significant funds/grants to support those who are struggling.
- UBC - CIRS Building. Cambridge - New Court refurbishment.
- Passivhaus. Its far more targeted the over complex BREEAM

We hope you find this supporting information useful in addition to our online consultation response. The EAUC is committed to ensuring sustainability is at the heart of Higher and Further Education and we would recommend the Government seek our advice in delivering carbon reduction initiatives in the tertiary education sector prior to commencement.

Yours sincerely,



Iain Patton, CEO, EAUC