



Welsh Government Call for Evidence: Decarbonisation of Public Sector
14th September 2017

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?

Our discussion led to no clear answers to this question. It should be noted that during the launch of the Energy Savings Opportunity Scheme, great confusion was caused in the Higher Education Sector following a poorly defined description of the Public Sector. This is well documented.

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.

We refer you to the scope one and two carbon emission reductions that have been achieved across the higher education sector in Wales between 2012/13 and 2015/16. Full data sets are available from the Higher Education Statistics Agency (HESA.ac.uk). Based on scope 1 and 2 carbon emissions per square meter of gross internal area, emissions have reduced 24%.

year	12/13	13/14	14/15	15/16
kgCO2/m2				
GIA	79.0857	72.03626663	71.96731	60.05261

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.

We agree that scope 1, 2 and 3 emissions should be included in the scheme eventually. This should be based on a consistent monitoring approach and should be auditable. Again, we refer you to the success of the data collection exercises undertaken by HESA.

We also refer you to the People and Planet University League and the progressively demanding criteria required to comply. Initially scope 3 reporting was optional, becoming mandatory more recently.

Concerns have been raised regarding the frequency of update of Scope 3 carbon emissions, the lack of consistency in calculation methodologies and the risk of double counting.

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?

The Higher Education Sector is used to completing annual HESA returns. Similarities to this system would minimize administrative burden by reducing and repetition.

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?

The group felt that interim targets would be useful. These should be set between 2-5 years to enable strategic planning to be undertaken, but to retain focus on the targets ahead.

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?

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?

The sector approach is to tackle absolute carbon emissions, as was encouraged during the initial Carbon Trust Carbon Management Plans. The idea of offsetting emissions is not favorable to the sector as this may be interpreted as a tax on the public sector. Additionally, the notion of offsetting was felt to be short sighted as the offsetting projects would eventually run out.

As a sector, we were unaware of successful large scale offsetting initiatives.