

16th December 2010

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- Type of organisation i.e. National Sustainability Membership Charity
- Size of organisation 300 UK universities and colleges, 2600 member contacts, 16 staff

I am very grateful to EAUC Board Member Neil Smith of the University of Southampton for leading on this consultation and writing this response.

CRC consultation response from the EAUC

1. CRCEE review

The EAUC is recognised as the environmental champion for the Higher and Further Education sector and our strength comes from our membership comprising over 300 UK universities and colleges. This response to the consultation is based on our member's views. We are aware that individual institutions have responded separately to the consultation.

We recognise the consultation does not ask recipients to comment on the overall health of the revised CRCEE scheme. But, we believe this is an opportunity missed and would ask you to conduct as a matter of urgency a thorough review of the scheme rather than just tinkering around the edges.

These are difficult economic times for the sector and uncertainty and risk associated with CRCEE does not help HEIs plan for this future. We are committed to play our part to help the UK reduce its carbon emissions, as demonstrated by approval for HEFCE's carbon reduction strategy (HEFCE, 2010)¹. However, the sector needs the right tools and levers to help it to embed carbon reduction targets in institutions while still delivering their core mission of providing the UK with the people and science and technology to tackle the low carbon agenda.

We broadly welcomed the CRCEE as the financial implications helped raise the energy and carbon agenda in HEIs and support efforts to cut carbon. However, our members have always been concerned about the overly bureaucratic nature of the scheme and the amount of resources needed to meet its requirements. Hence, we would welcome a simplified scheme.

We were extremely disappointed when the government announced the change to the scheme in the comprehensive spending review, from a recycling fund which incentivised organisations to cut

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carbon to a tax. We believe the administrative burden of the revised scheme now outweighs the benefits and would strongly recommend you consider scrapping the scheme and add the tax levied on to the existing CCL. This would minimise the administrative burden on both the government and contributing organisations, while still sending a strong signal to organisations to reduce their carbon emissions.

2. Ring fence tax revenue

We want the tax raised through whatever scheme to be ring fenced and made available for carbon reduction initiatives. This is vital for the credibility of the scheme and the government's stated aim of meeting the UK's carbon targets and being 'the greenest government ever.'

3. Better and more timely advice and guidance

The EA must provide guidance to help minimise uncertainty with the scheme. For example, guidance on the best financial route for installing on site energy generation is needed to help institutions be clear about how electricity generating credits, ROC's and FITs operate.

4. Reducing administrative burden

We think re-registration for each phase of the scheme is unnecessary as most organisations will run from one phase to the next. We would also welcome a review of the process for producing the evidence packs as this takes up a lot of time.

5. Response to questions

The response to the questions must be viewed in the light of the above comments.

Q1 Do you agree with Government's proposal to extend the introductory phase and the associated amendments?

Yes, subject to keeping the allowance price the same.

Q2 Do you agree with Government's proposal to remove the information disclosure requirement?

Yes, on the basis this reduces administration costs.

Q3 Do you agree with Government's proposal to amend the landlord/tenant rule in respect of Northern Ireland departments?

No objection.

Q4 Do you agree with Government's proposal to redistribute the administrators' responsibilities?

No objection.

Q5 Do you agree with Government's proposal to update reference errors in the original order?

No objection.

Q6 – Do you agree with Government's proposal to update the interpretation definitions?

In partnership with

Yes, clear definitions are needed to ensure the scheme works correctly.

We would welcome the opportunity to discuss any of the matters raised and to contribute to a more thorough review of the CRCEE.

¹HEFCE (2010) Carbon reduction target and strategy for higher education in England
(http://www.hefce.ac.uk/pubs/hefce/2010/10_01/)

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