

DECC Consultation - Consultation on the term 'carbon neutral': its definition and recommendations for good practice

A combined response by the English National Park Authorities Association and the Welsh Association of National Park Authorities

May 2009

1. Introduction

1.1 The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities¹. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of officers who are working within the policies established by the National Park Authorities (NPAs). We work closely with the Welsh Association for National Park Authorities which provides a similar function for the three Welsh NPAs² and this is a combined response. Individual National Park Authorities may submit separate comments, which will draw on the specific issues for their particular area. We are happy for our response to be made publicly available and to discuss its contents with officials if that would be helpful.

1.2 NPAs are independent local authorities funded through Defra and, in Wales, the Welsh Assembly Government. They have statutory purposes as set out in the *Environment Act* 1995 to: conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and to promote opportunities for the enjoyment and understanding of its special qualities by the public. In carrying out these duties, NPAs also have a duty to seek to foster the economic and social well being of local communities. National Parks cover approximately 10% of the land area of England and Wales (7% of England and 20% of Wales).

1.3 ENPAA and WANPA welcome the government's consultation on carbon neutrality. NPAs have already shown significant commitment to the idea of carbon neutrality:

- ENPAA produced a position statement on climate change in 2006, part of which included a commitment that all of the English NPAs will achieve carbon neutrality in their operations by 2012;

¹ The nine English National Park Authorities are: Broads Authority, Dartmoor NPA, Exmoor NPA, Lake District NPA, New Forest NPA, Northumberland NPA, North York Moors NPA, Peak District NPA, Yorkshire Dales NPA.

² The three Welsh National Park Authorities are: Brecon Beacons NPA, Pembrokeshire Coast NPA, Snowdonia NPA.

- the three Welsh NPAs have signed the Welsh Local Government Association’s Welsh Declaration on Climate Change and Energy Efficiency;
- five of the nine English NPAs have signed the Nottingham Declaration; and
- significant work on emission reductions has already taken place as the following examples, taken from across the family of National Park Authorities demonstrates:
 - purchase of low-emission fleet vehicles, including vehicles which use bio-diesel sourced from waste cooking oil;
 - reductions in staff business mileage through target setting;
 - energy efficient building construction and retro-fitting;
 - installation of alternative energy sources, including ground-source heat pumps, solar panels and biomass boilers; and
 - purchase of video-conferencing facilities at each NPA (through Defra funding) to facilitate joint NPA meetings without the need for travel.

1.4 We are in broad agreement with the proposed measurement and reduction of emissions. We have concerns, however, about the current recommendations in the consultation paper around offsetting and suggest an alternative view below. In particular, we would urge the Government to develop a clear, simple and transparent tool for domestic offsetting.

2. Definition and Transparency

2.1 We agree with the basic definition of carbon neutrality as set out in the consultation paper, i.e.

“Carbon neutral means that – through a transparent process of measuring emissions, reducing those emissions and offsetting residual emissions – net calculated carbon emissions equal zero.”

2.2 We are very supportive of the proposed transparency of the process and see this as crucial in any process that is to gain credibility. NPAs intend to ensure that the process of measuring, reducing and offsetting their emissions is transparently documented

3. Measuring Emissions

3.1 NPAs are committed to auditing their own emissions and support this attempt to ensure all organisations aiming to become carbon neutral are clear about what emissions they have measured. We would also be likely to support more stringent requirements than currently set out, should the government propose these – for example, the use of a common reporting

tool that allows clear comparisons to be made between different organisations which claim to be carbon neutral.

4. Reducing Emissions

- 4.1 NPAs recognise that emission reduction is paramount in working towards a low carbon economy. This is the main area on which we are concentrating our efforts, through improving the efficiency of our operations, seeking new energy sources for our properties (ground source heat pump, biomass etc.) and changing our working practices. We feel that the guidance on good practice is very useful, but could be strengthened to further emphasise the need for transparent, on-going reductions.

5. Offsetting Emissions

- 5.1 As noted in paragraph 1.2, NPAs have statutory purposes as set out in the *Environment Act 1995* to: conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and to promote opportunities for the enjoyment and understanding of its special qualities by the public. In carrying out these duties, NPAs also have a duty to seek to foster the economic and social well being of local communities.
- 5.2 The current proposal for offsetting those emissions that remain after emission reduction is to buy carbon credits from government-approved schemes. In the guidance set out as best practice in the consultation document this essentially means investing in overseas offsetting projects.
- 5.3 Given the above statutory National Park purposes, it is difficult to see how NPAs can justify using their public funding to purchase carbon offsets that fund overseas carbon reduction projects. Indeed we may not be able to do so without acting *ultra vires*.
- 5.4 NPAs already use their funding to support domestic projects that are located within the National Park for which they are responsible. Many of these projects could have significant potential for carbon offsetting, while also providing benefits to local communities, biodiversity, etc.
- 5.5 Examples of projects which offer carbon savings include community micro hydro-electric schemes; installation of biomass heating systems in rural business centres; small scale solar and wind energy installations; and woodland planting schemes. These projects are often initiated and run by National Park Authorities, with funding coming from a combination of NPA budget and external funding sources.
- 5.6 ENPAA and WANPA are not suggesting that the entire emission reductions attributable to these projects should be used as offsets by the NPA involved.

Rather than the financial investment by the NPA (from its own budget, not externally sourced funding) is recognised in terms of the contribution towards the carbon savings of the project, by being eligible for a proportionate amount of domestic carbon credits. These carbon credits could then be used to offset some of the remaining emissions from the NPA's own operations.

- 5.7 We would argue that domestic offsetting does have a place and should be included within the best practice guidance. As shown in the above examples, NPAs take the lead on innovative projects within National Parks. It is not the case that these projects simply “realise emissions savings that would have happened anyway, rather than delivering additional savings that lead to a genuinely lower concentration of greenhouse gases in the global atmosphere” (paragraph 7.7 of consultation document). Rather, they are projects which would not otherwise take place, are often in hard to reach deep rural areas, and do lead to real emission reductions.
- 5.8 It is our view that there is an urgent need for the government to develop a clear, simple and transparent tool for domestic offsetting that allows projects such as that described to be part of the government-approved offsetting scheme.
- 5.9 With this system in place, NPAs would be likely to meet their targets to become carbon neutral themselves and would then be well-placed to act as high profile advocates to publicise carbon-neutrality to the millions of visitors who come to National Parks every year. This publicity would help to increase understanding and acceptance of the term nationally. It should be noted, however, that NPAs would be likely to move away from the use of the term ‘carbon neutral’ if the current proposals stand, rather than purchase overseas offsets.

6 Long-term prospects for carbon neutrality

- 6.1 We would support a much greater emphasis on increasing the emission reduction component and reducing the offsetting component over time, as a way to move forward with the term carbon neutral. We believe that anyone using the term carbon neutral should clearly state the proportion of emissions savings that are achieved through reduction compared to offsetting.