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Constable Jackson
Chair, EHI Panel

BY EMAIL

15 March 2022

Dear Mike

Re: Draft Carbon Neutral Roadmap Review Hearing: Residual Questions

Please see responses below to your residual questions on the draft Carbon Neutral Roadmap ('the draft CNR') following the public review hearing ('the Hearing') on Tuesday 8 March 2022.

Governance and Oversight

1. The Draft CNR proposes appointing a Minister for Energy and Climate Change and establishing a Scrutiny Review Panel on Energy and Climate Change to underpin the long-term commitment to the CNR (to ensure transparent reporting, international commitment, leadership from Government and strengthening civic voice).

Not discounting that Scrutiny will indeed have a key role to play in oversight of the implementation of CNR policies but considering that a Scrutiny Review Panel will likely not encompass the expertise of a specially established scientific oversight body such as the Climate Change Committee in the UK – Minister, in your view, would a separate independent, non-political body not be a pragmatic approach in taking overall responsibility for the transition to becoming net-zero and to enhance the overall governance and accountability of the process over the long term policy cycle? Particularly given that the nature of the long-term policy ambition will stretch over multiple political terms of government, arguably making ongoing oversight difficult or inconsistent if the oversight body was wholly political in its membership?

The matter of a bespoke ministerial portfolio, a standing scrutiny panel, and an independent advisory panel were discussed at the Hearing, and our responses will be available for review when the transcript is formally published. We would add that following the hearing, these matters have been addressed in the Carbon Neutral Roadmap ([P.74/2022](#)) which has been presented to the Assembly for debate at the 25 April 2022 sitting.

Strategic Policy Four – Policy Programme and Development – Heating

2. Policy HT2 assumes that the electricity source will be able to meet the increased demand. What consideration has been given to an alternative, should that not be the case?

The issues with regard to capacity and security of electricity supply and on contracts and the potential disruption to supply due to geopolitical events that are outside our control, were covered in the Hearing.

Strategic Policy 2 will consider future options for energy supply, including consideration of renewable energy sources. The policy also requires that energy suppliers provide transition plans regarding security of supply.

3. A further assumption of Policy HT2 is that the construction industry will be able to support all the required implementation changes. Has the industry been consulted in that regard and are you confident that the requirements can be met?

A number of sector specific workshops were held with the construction industry during the consultation period. A written response to the consultation was received from the Jersey Construction Council which was considered as part of the preparation of the final CNR

The issues regarding skills in this sector were covered during the Hearing.

4. How will industry engagement be ensured as part of the review of the building bye-laws and legislative drafting process to ensure a thorough process is undertaken that results in appropriated legislative outcomes?

The review of the building bye-laws and associated drafting or updating of legislation is a statutory process with associated consultation requirements.

Other aspects of the review of the building bye-laws were covered in the Hearing.

5. The Citizens' Assembly recommended that Government and commercial properties should be carbon neutral by 2030. This recommendation was 'under active consideration'. Has this recommendation been carried through in the draft CNR and, if so, how? In respect of the draft CNR, is it intended that existing Government and commercial buildings be carbon neutral by 2030?

Policies HT1, HT2 and HT3 are policies for both domestic and commercial buildings, proposing a heat switch incentive, building bye-law review and legislation for Energy Performance Certificates. They include a requirement for all new buildings (including commercial) to be zero-carbon by 2025 and a prohibition on new fossil fuel boilers being installed in any property after 1 January 2026. The purpose of these policies is to reduce the greenhouse gas emissions associated with the building stock as much as possible by 2030. In 2030 there will be remaining greenhouse gas emissions from pre-existing fossil fuel boilers in commercial buildings. Carbon sequestration or the purchase of carbon offsets will be needed in order for them to be carbon neutral at this date.

There is not a proposed policy within the draft CNR mandating that private businesses must have carbon neutral buildings by 2030.

Policy EN6 covers carbon offsets and the broader decision on the Island becoming carbon neutral. It proposes that a decision on becoming carbon neutral will be taken no later than 2028.

6. Mandating for Energy Performance Certificates (Policy HT3) is recognised in other jurisdictions to encourage improvement of standards for energy efficiency. Having a landlord licensing scheme has been noted as a dependency for this policy so that rental properties can be identified. Considering that, to date, a licensing scheme has not been successfully passed by the Assembly, how confident are you that this can be timely progressed to not detract from the objectives of this policy?

Other options for identifying rental properties are being considered by Strategic Policy, Planning and Performance (SPPP) and will be investigated in the next phase of the detailed policy design.

7. What consideration has been given to the training requirement to grow an on-Island auditing team to undertake the energy audits that will be required?
- a. Have discussions been held within the industry or with Highlands College regarding whether they could help to facilitate this requirement?

As part of the policy development process, discussions took place with Highlands College and Skills Jersey. Both organisations reviewed the policy as presented in the draft CNR.

- b. How would local industries be supported to provision this policy workstream?

Policy EN3 recognises that further work is required in consultation with the industry and training providers

8. The Citizens' Assembly recommended that Government should empower and enable communities to become carbon neutral and suggested the creation of frameworks for communal power generation and energy efficiency measures related to heating/cooling/cooking. This recommendation was 'accepted' by the Minister. Has communal power generation been carried through in the draft CNR and, if so, how?

The use of innovative energy technology solutions is covered by Strategic Policy 2. The potential for communal power generation will be considered as part of the energy review alongside other energy technology solutions.

Strategic Policy Four – Policy Programme and Development: Other on Island and off- Island Emissions

9. To promote low carbon lifestyles (policy OE1), particularly in respect of scope 3 emissions (off-island emissions) and through shifting Islanders' behaviours, it's our understanding that a focused education requirement as well as an overarching level of expertise to facilitate that resource will be necessary. How do you propose this will be facilitated and resourced?

Policy OE1 in the draft CNR proposes a resourced programme to develop and deliver an education and engagement programme to help Islanders to reduce their off-Island (scope 3) emissions. The new programme will build on the eco active network, and the work carried out through Jersey's Climate Conversation, which have begun to build momentum to the conversation, raising awareness and helping to educate Islanders through engagement and action. The programme will engage individuals, businesses, community organisations and Parishes to explore how they can act to reduce scope 3 emissions. This will include the development of climate-action plans that might subsequently secure funding through the small grants programme proposed under policy EN2.

Policy EN4 in the draft CNR outlines how the COP26 education pledge will embed climate education of a high quality into Islander's education and learning.

10. Considering that the proposed policy areas within the draft CNR involve specific sectors including the construction (Policy OE2), agricultural (Policy OE3) and finance (Policy OE5) sectors, it's evident that these policies would require significant consultation and support from the local industries to ensure the deliverables are realistic and achievable for Jersey. Minister, do you agree with this assumption and, if so, how will that level of engagement be encouraged and maintained to ensure timely delivery of the proposed policy objectives?

Policy OE1 in the draft CNR proposes a resourced programme to develop and deliver an education and engagement programme to help Islanders reduce their off-Island (scope 3) emissions.

11. In respect of reducing carbon emissions for the construction sector, the Policy framework will depend on other policies (those proposed in the bridging Island Plan -for example) being agreed as well as legislative changes taking place. Has consideration been given to the potential impact on the policy outcomes should the associated Draft Bridging Island Plan Policies change or not be adopted, for example, and is there a contingency plan for that eventuality?

Questions in relation to alignment with the timing and policies within the Bridging Island Plan were covered in the Hearing, and our responses will be available for review when the transcript is formally published.

Strategic Policy Four – Policy Programme and Development – Transport

12. Minister, during our recent public hearing with the Minister for Infrastructure, the Minister noted that although supportive of the move to adopt electric vehicles he was not convinced of the pace at which this was being proposed. It was his view that the proposed pace of change from petrol/diesel engines to electric was too fast and that Jersey was not ready for the speed at which the change was being proposed. What is your view in that regard?

Questions in relation to the pace of change required were covered in the Hearing, and our responses will be available for review when the transcript is formally published.

- a. Do you believe that the that the proposed projections within the Draft CNR for the electrification of vehicles are realistic and achievable?

Questions on the assumptions applied in the policy that are associated with the move to electric vehicles were covered in the Hearing, and our responses will be available for review when the transcript is formally published. It is recognised that further stakeholder engagement will be required as part of the policy design phase.

13. It's our understanding that a phased approach for the electrification of all Jersey's vehicles will take place between 2030 and 2050. Policy TR5, in the draft CNR specifies a ban on the importation and registration of petrol/diesel vehicles. For the benefit of the public listening, could you please outline how that phased approach would work in respect of the types of vehicles that would be banned at each stage?

The policy, as proposed in the draft CNR, is intended to align with relevant UK legislation. The policy will commence with the phase out of petrol and diesel vehicles in 2030 and 2035 for hybrids. The policy is designed to ensure that Jersey does not become a 'dumping ground' for older polluting vehicles. The policy will be developed further following

additional stakeholder engagement and consultation, which will take place as part of the statutory process when preparing the required primary legislation.

14. How will the asset life of purchases be appropriately managed to avoid vehicles/heating systems being replaced/scrapped when they remain useful, and also replaced timely to avoid delays in carbon reductions through not making the shift sooner? In your view, how can that balance be appropriately achieved?

This matter will be addressed during the design phase of the CNR following further stakeholder engagement and consultation.

15. Considering air travel is a fundamental aspect of island life and people will need to utilise air travel for personal and business reasons, what is being proposed to balance the demand/requirement for air travel with associated carbon emission reductions?

Questions regarding the use of low carbon fuels for marine and aviation transport were covered in the Hearing, and our responses will be available for review when the transcript is formally published. Policy OE1 in the draft CNR proposes a resourced programme to develop and deliver an education and engagement programme to help Islanders reduce their off-Island (scope 3) emissions. This includes enabling Islanders to make informed decisions and choices with regard to air travel.

It is accepted that until low carbon air crafts are commercially available, unavoidable air travel will be integral to our location and island living. It may be that offsetting is deemed the appropriate way to balance those emissions.

16. Ports of Jersey has recently signed the 'Toulouse Declaration', an agreement to help the aviation industry become more eco-conscious and has committed to ensure a net zero future. Ports of Jersey is due to outline further adjustments to their sustainability strategy in March. How does this align with the policy approach of the draft Carbon Neutral Roadmap and has this been actioned in accordance with the roadmap?

Ports of Jersey have actively engaged in the development of the proposed policy TR11 in the draft CNR. We are delighted that since preparing the draft CNR, Ports of Jersey have become a signatory to the 'Toulouse Declaration', and we have been liaising with them to ensure that this will be reflected in the final version of the CNR.

Strategic Policy Five – Becoming Carbon Neutral

17. It's our understanding that by Jersey aligning to the Paris Agreement that Jersey would need to reach net-zero emissions by 2050, however, this will not detract for Jersey reaching carbon neutral status earlier (by 2030 or otherwise), if so wished. In addition, that carbon offsets would be a necessary requirement in achieving this (Policy EN6 – carbon offsets). For the benefit of the public listening can you confirm whether our assumption is correct?

Questions on this topic were covered during the Hearing, and our responses will be available for review when the transcript is formally published. To reiterate the comments made, it was confirmed that carbon offsets would be required in order to achieve carbon

Minister for the Environment



neutral status by an agreed date, be that 2030 or otherwise. The overall aim of the Paris agreement is to reach net-zero by 2050.

I hope the above responses are of use to the Panel as part of their review.

Yours sincerely

A handwritten signature in blue ink that reads "John Young".

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