

LOCAL GOVERNMENT NATIONAL INDICATOR SET TECHNICAL HANDBOOK - RESPONSE TO CONSULTATION DOCUMENT

Name and address of responding organisation:
Devon County Council

Is this your organisation's official response to the consultation? Yes

Name and phone number of key contact in case of follow-up queries:
Ian Bateman 01392 383390

National Indicator Number:

185

Please complete a separate form for each indicator on which you wish to respond

Indicator Issue	
1. Is the Technical Definition of this indicator clear?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
If NO a. What aspects of the technical definition of the indicator are unclear? Please specify clearly - is it in relation to the measurement method, or - on reporting b. Please suggest how the template can be clarified/improved.	Please see comments at para 6 on coverage, the treatment of direct and indirect emissions and the expected performance.
2. Does the Technical Definition for this indicator have any unintended consequences?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If YES a. What are the unintended consequences on this national indicator? b. Can the unintended consequence be avoided? If so, how?	Please see comments at para 6 on the implications for LAs in the CRC - high % reductions may not be cost effective.
3. Will the Technical Definitions for this indicator work in practice?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
If NO a. Why would this technical definition not work in practice?	

4. Is this indicator defined at the right spatial level?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
a) If not, what level should it be defined at? (including whether information is already gathered and/or reported at that level and if so where, if not, estimated cost of collecting and reporting it)	
5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)?	Ethnicity <input type="checkbox"/> Gender <input type="checkbox"/> Religion <input type="checkbox"/> Age <input type="checkbox"/> Sexual orientation <input type="checkbox"/> Disability <input type="checkbox"/> Other <input type="checkbox"/> (Please specify)
a) For any boxes ticked at 5, is this information already gathered and/or reported and, if so, where? If not, what would be the estimated additional burden of collecting and reporting it?	
6. Further comments on the questions above and /or any other comments that are not covered above questions.	
<p>1. For 2 tier authorities what is the scope of the proposal? Given that this is an LAA activity (and hence has a strong partnership dimension), is the indicator intended for the County Council only or are the District Councils also required to identify their carbon footprints and reduce emissions? If so are these figures amalgamated or reported separately? If the District Councils are not to be included then there is no real partnership element and the indicator is not appropriate to an LAA. DCC is already doing this through the Carbon Trust's Carbon Management Programme (CMP).</p> <p>2. The indicator uses the term 'direct' and 'indirect' emissions which have specific meanings in greenhouse gas accounting. Direct emissions are those</p>	

emanating from sources owned or controlled by the Council. Indirect emissions occur as a consequence of the Council's activities but are emitted from sources owned or controlled by others. Using this categorisation the following emissions have been included within DCC's CMP.

- Direct emissions.
- Consumption of natural gas and oil in properties.
- Vehicle fleet emissions.

- Indirect emissions.
- Consumption of grid electricity for properties and street lighting.
- Business miles by car, bus, rail and air including vehicle hire.
- Staff commuting miles.
- Office waste.
- Water consumption.

In the Defra definition there is the potential to confuse the 'indirect' aspect. The aim of the indicator is to measure the progress of LAs in reducing emissions from 'their own operations which are directly under their control.' Control is based on financial accountability and therefore there is confusion by including 'outsourced services'. These services are purchased by the County Council but there is no financial control. Whilst we can ask for emissions to be identified and reported in contracts, we do not and cannot control them. This is essentially the position with all procurement activity which is also mentioned specifically in the indicator. How do you measure the emissions content of a paper supply contract or a climate change communications contract? There are no readily available proxy measures for calculating these emissions.

3. The baseline is to be set for 2008-9 so based on the experience with the Carbon Trust's LA CMP the start of emissions reduction activity is in effect deferred until 2009-10. In practice unless there are projects already on-the-shelf and ready to go the first emissions savings will not be made until 2010-11. So the 3 year LAA process will only see one year of real emissions reduction activity. Perhaps the baseline year should be 2007-8?

4. The mark of good performance is 'high % reduction against 2008-9 baseline'. What does this mean? It is evident from the LA CMP process that very aspirational targets (60% over 10 years in one case) are being set without any real understanding of the resource required to achieve success. Whilst this is a post hoc indicator (and hence is concerned with achieved savings) the numbers are unlikely to meet the 'high' expectation. Given the government's national target of 60% by 2050 over 1990 levels (or is it now 80% after recent speeches?), an organisation starting in 2008 (or 2009 – see para 3) would need to make 2.2% compounded annual emissions savings. This would rise to 3.8% year-on-year if the target was 80%. Neither of these figures seems to meet the 'high' definition yet both are realistic in terms of achievement. Perhaps such minimum 'doing your bit' targets are more appropriate as failure to achieve them means that you are not contributing as you should.

5. Following on from the measure of good performance, there is a problem

with high targets given the government's preferred approach to climate change mitigation is through market-based carbon trading. The Defra managed Carbon Reduction Commitment (CRC) is an exceptionally well considered mechanism that will incentivise larger local authorities to reduce emissions through the purchase of pollution permits and reward based on performance. As a potential mandatory participant, DCC views the CRC as the most appropriate mechanism for promoting emissions reduction. Given a proposed market price of £8 per tonne of CO₂ saved, it will allow us to make the right judgement between embarking on an emissions reduction project or buying pollution permits. In this way emissions reduction is achieved at the lowest cost for us and the market. If we are unable to identify projects that cost less than the market price to implement then we will not embark on them and hence make no emissions reduction. The problem with a '% reduction' measure is that it takes no account of the cost of implementing emissions reductions and is therefore a very blunt instrument. It also means that it may be costing more than is necessary in the grand scheme of things i.e. it is expensive for the individual authority trying to meet a target (and presumably a position in a league table) and uneconomic in a national context. A '% reduction' measure also takes no account of those authorities that have already embarked on this route and got to the position where the next percentage point of reduction is very much more difficult and expensive to achieve than the first one. Consequently, it could be viewed as a disincentive to further action for those already on board.

6. There is a need for broad agreement on what's in and what's out. The main areas of contention are the municipal waste stream (MSW), schools and, as previously identified, contracted out services and procurement. As far as the volume of emissions from the MSW is concerned, it has the potential to form the majority of an authority's carbon footprint. Given the strict regulatory regime surrounding the disposal of waste and the existence of NI 193 (landfill indicator), carbon footprinting this activity is unnecessary. In terms of schools, given that they are now autonomous business units with control over their own finances, they fail the 'control' criterion explored above.

7. The proposed Defra standardised carbon footprinting methodology for use with this indicator is extremely complicated and does not include procurement, outsourcing or waste. Moreover, it treats 'green electricity' delivered through the national grid as emissions free which is contrary to the proposals in Defra's CRC proposal where all grid electricity produces emission whether it is green tariff or not. We support this latter view.

8. There is no point in measuring this indicator to 2 decimal places. Given that the change in CO₂ output is only an estimate and in reality the absolute measure is rounded up to tonnes calculating performance to one hundredth of a percentage point is not required.

Completed versions can be sent to niconsultation@communities.gsi.gov.uk. Hard copy responses should be returned to Local Government Quality and Performance Division, Zone J2, 4th Floor, Eland House, Bressenden Place, LONDON, SW1E 5DU.