

Welsh Assembly Government Consultation
Energy Saving Wales
Energy Efficiency Action Plan

Response by
Friends of the Earth Cymru

April 2004

Friends of the Earth Cymru

Friends of the Earth Cymru inspires solutions to environmental problems, which make life better for people.

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- is part of the UK's most influential environmental campaigning organisation
- is part of the most extensive environmental network in the world, with over 60 national organisations across five continents
- supports a unique network of campaigning local groups working in communities across Wales
- is dependent upon individuals for over 90% of its income

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'ENERGY SAVING WALES – Energy Efficiency Action Plan'

Comments on the Energy Saving Wales Consultation Document

1. General Comments

Friends of the Earth Cymru welcomes the opportunity to comment on the Welsh Assembly Government's draft Energy Efficiency Action Plan. Significant improvements in energy efficiency are essential if we are to mitigate the effects of climate change, reduce the other adverse environmental and health impacts of energy use and reap the economic benefits of energy saving measures. Regrettably, we believe that this document falls well short of what is required.

It is, to a large extent, a reiteration of standard energy efficiency information and advice that has been available for a number of years and which has failed to reverse the growth in energy use. Since 1990, for instance, DTI figures show that total final energy consumption in the UK has risen from 147.3 mtoe (million tones of oil equivalent) to 157.2 in 2002. Domestic energy consumption in this period rose from 40.8 mtoe to 47.9 mtoe. At the same time, greenhouse gas emissions in Wales also rose by approximately 6 per cent. This indicates the significant challenge that Wales faces as it attempts to take a lead role in promoting sustainable development and in complying with the Kyoto protocol on climate change.

Overall, 'Energy Saving Wales' provides insufficient information to warrant a detailed response. We hope that the following comments and recommendations will enable the Assembly Government to draft a more effective energy efficiency action plan that is in keeping with its requirement in the Sustainable Energy Act 2003 to designate an energy efficiency aim for Welsh homes that would emphasise both carbon emission reductions and the alleviation of fuel poverty. The plan should also, at least, enable the Assembly Government to implement the Economic Development Committee's recommendation that it should support the UK Government's targets for energy efficiency. According to Lord Whitty, the UK Government's energy efficiency minister, the UK is committed to saving 5 megatonnes of carbon per annum from household energy efficiency by 2010, equivalent to a twenty per cent improvement. The Energy Efficiency Action Plan should support this UK target and designate an appropriate proportion to Wales.

2. Cost effectiveness of proposed measures

There is no indication in the document of the extent of the energy saving contributed by each of the different energy efficiency measures and the likely cost of implementing each measure, and no indication of the contribution towards the savings target that could be delivered by each of the sectors. Consequently, the document fails to demonstrate that the measures proposed are those that will contribute the most cost effectively to the biggest savings in

emissions. We suggest that such an exercise is included both to inform the development of the plan and to ensure that the finite resources available for this task are directed into promoting those measures which achieve maximum savings in emissions. It is essential that the Welsh Assembly Government identifies the costs of, and provides the budget to deliver, the required carbon savings and reductions in fuel poverty that can be gained by energy efficiency improvements. Significant increases in expenditure on effective schemes (such as, possibly, the HEES scheme) should also be implemented as a priority. It should be remembered that public funds used to support energy efficiency programmes generate a relatively high number of jobs per pound spent.

3. Implementation

There is no explanation in the plan of how the proposed objectives and actions are intended to be implemented or achieved in practice. There are no suggested targets and timetables for delivery and no suggested indicators for measuring progress against such targets to ensure the objectives are achieved within a proposed timeframe. Consequently, it is difficult to see how such objectives can be realised in practice. We suggest that a detailed framework for implementation with appropriate indicators is developed and included in the plan to demonstrate how in practice each objective is intended to be met. Targets should be set for each of the sectors and a mechanism to monitor and report on performance towards achieving these targets should be established.

Housing repair and refurbishment schemes in Wales provide an excellent opportunity to upgrade the existing housing stock to the highest standards. To date, only some community scale house refurbishment schemes or individual houses within such schemes have included loft insulation and exterior polystyrene insulation cladding beneath a rendered finish. Roof slate replacement is usually part of such refurbishments and provide a timely and cost saving opportunity to install solar panels.

4. Barriers

We agree with the stated "barriers to adopting energy efficiency measures". We commend the proposed measure to set up an Energy Saving Portal for Wales which would help to address such barriers such as "lack of knowledge" and "concerns about hidden costs". However, whilst many of the proposed measures appear to address the barriers of "lack of knowledge", "lack of resources" and "concerns about hidden costs", few appear to address directly the stated barriers of "lack of motivation" and "attention overload" as nowhere is it indicated which barriers which measures are intended to overcome or how such barriers are to be overcome. We therefore recommend that for each of the proposed measures set out in the plan, it is clearly indicated which barrier(s) each is intended to overcome so as to inform the implementation design of each measure and, to demonstrate clearly that all barriers have been addressed adequately (e.g. How can the portal reach those without access to the internet? These are more likely to be the fuel poor who are most in need of assistance). The energy saving portal, and the service providers signposted by it, need to be adequately resourced to be able to deliver

meaningful results. At present, service providers, such as energy advice centres and energy agencies, often have to spend too much time securing sources of funding to ensure their continued existence rather than directly delivering energy efficiency improvements. The actions and measures initiated by the portal need to be quantified along with the subsequent reductions in carbon dioxide emissions.

5. Clarification of the purpose of the plan

As a general observation we note that Energy Saving Wales states that *"This plan aims to be a practical tool providing information, contact details and encouragement for people in all walks of life to take action to save energy"* yet the document itself consists of seven useful website addresses, a few suggestions of energy saving measures in each sector, and a list of Assembly objectives supporting energy efficiency with little indication as to how such objectives are to be achieved in practice. As it stands the document lacks clarity as it is neither a practical tool nor is it aimed at people in all walks of life. We suggest that the mismatch between content and stated aim is resolved so as to focus the document clearly.

6. Energy Performance of Buildings Directive

There is no mention in the document of any proposed measures to ensure Wales' compliance with the Energy Performance of Buildings Directive (EPBD) by the 2006 deadline as agreed in the government's energy white paper. The UK's buildings create more than 40% of its CO₂ emissions and consequently EPBD's requirements have enormous potential to reduce emissions if implemented promptly and effectively. We recommend an additional objective for inclusion in the document for Wales to put in place all the requirements of the EPBD by its deadline.

7. Local Authority Policy Agreement

We welcome the introduction of a Local Authority Energy Policy Agreement in the public sector and whilst we welcome the proposal for a higher profile for Energy Efficiency Advice Centres and Home Energy Conservation Act Officers and the provision of Local Authority Energy Officers the plan gives no indication as to the numbers of such officers to be made available in the domestic sector. It is essential that these activities receive adequate funding in order to avoid the problems that local authorities have experienced in their often futile attempts to reach HECA targets.

8. Climate Change Awareness

We recommend that the Assembly Government funds a climate change awareness programme that would inform all sectors of the impact our lifestyle is having on the climate and of the measures that have to be taken in order to lessen that impact. A climate awareness programme was successfully implemented by the Pembrokeshire Energy Agency during 2001/3 with funding from the Assembly's Environment Development Fund. This created greater awareness of the problem and the solutions in the domestic, public and business sectors in a cost effective manner.

9. Renewable Energy

We suggest that a strong recommendation should be made to install solar panels in new buildings. Greater support needs to be given to encourage the installation of all small-scale renewable energy systems and the barriers that are preventing the widespread application of CHP systems have to be meaningfully addressed.

10. Building Regulations

We strongly recommend that the Welsh Assembly Government ensures that powers to draft and implement stronger building regulations are devolved to Wales. The application of building regulations needs to be more rigorously enforced to ensure that standards and work quality are comprehensively achieved.