

## **PUBLIC CONSULTATION DISCUSSION PAPER**

Issued by Planning and Environment on 28<sup>th</sup> February 2007

**PURPOSE OF CONSULTATION** To seek opinion on proposed new measures for raising environmental taxes, and the schemes which could be funded through them in the areas of energy efficiency, waste recycling and transport.

**DEADLINE FOR RESPONSES** 4 May 2007

summary of Report / Questions to consider The report explains environmental taxation and considers how it could be applied in Jersey to achieve the States environmental objectives for energy, waste and transport. The report suggests how income from environmental taxes could be spent to support these objectives and the options which exist for raising the revenue. The report seeks the opinion of the public on the proposal that initially, environmental tax should be limited to a graduated vehicle emissions duty, and on the proposal that the revenue raised through this tax should be placed in an environmental fund, to be used to support measures designed to promote energy efficiency, waste recycling and improved transportation initiatives. The report contains 12 questions, with subsets of questions, on which the public are invited to give their views to help in the further development of this policy.

**FURTHER INFORMATION AND FEEDBACK** A comprehensive consultation paper containing full details of the economic analysis is available along with a shorter non technical summary, from <a href="www.gov.je">www.gov.je</a>, the States bookshop, the Public Library, or from the Environment Section at the address below. Comments received by 4 May will be analysed and used to help design the final proposals for the environmental tax proposals that will be brought to the States for debate later in the year.

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## **SUPPORTING DOCUMENTS**

Funding Our Future – A consultation about Environmental Taxes

Funding our Future – Non-technical summary

# **FUNDING OUR FUTURE**

A consultation about Environmental Taxes

February 2007



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## **Executive summary**

This report examines options for using environmental taxes to achieve the States' environmental objectives drawing on research and practice from around the world. The concept of environmentally based taxes is not a new one and there are many examples of such taxes in operation throughout the world. It goes on to recommend specific proposals to be developed and introduced from 2008.

Environmental taxes are fiscal mechanisms that are applied with the intent of reducing behaviours that are damaging to the environment. They may take the form of taxes, levies or charges but the defining factor is that they are introduced with the explicit purpose of bringing about a change that will benefit the environment. In this sense the ability of the tax to raise revenue is a secondary consideration although the re-application of such revenues to support behavioural changes is also an important function.

The successful use of environmental taxes can have positive benefits to individuals and to the economy. By changing behaviours, and thus reducing demand, the pressure for new or enhanced infrastructure can be reduced or avoided. This is especially important in an Island economy with a growing number of households.

Environmental taxes that are cycled into support mechanisms such as grants for home energy efficiency can have very positive paybacks, with the benefit received by adopting the efficiency measures outweighing the cost of the tax.

The report has focussed on Energy, Transport and Waste as these were the areas set out by the States for investigation. Particular attention is given to distributional issues that might arise as a result of the possible tax and spend measures.

The combination of environmental objectives, and the actions and funding to deliver them, is summarised in the following table

Subject	Objectives	Actions	Funding	Tax options
Energy	Reduce GHG emissions. Less dependency on fossil fuels	Energy efficiency Fuel switching Carbon offsets	£ 7 M (£1.4 M p.a.)	Energy flat tax Carbon weighted tax
Transport	Replace VRD revenue Reduce congestion Improve air quality	ITTP package, inc. Public transport	£ 5.5 M	Emissions banded VED Increase fuel duty Parking charges
Waste	Reduce volumes Increase recycling	Bring banks Kerbside collection	£1M	Gate fees Bellozanne Household charge

Environmental taxes work in two main ways:-

Firstly they work by increasing the cost of doing something to the point where people start to do less of that activity and so reducing demand. Some behaviours are more amenable to price signals of this kind than others. Motorcar usage changes little with increasing fuel

prices for instance. Raising taxes to the point where behaviour does change in these cases will cause distributional problems with the impact falling disproportionately on low-income households.

Taxes can cause a switch to another less damaging behaviour – often enhanced by setting a lower tax rate for the substitute. A good example of this is the switch that took place from leaded to unleaded fuel where leaded petrol was made progressively more expensive than unleaded leading to a major switch in what people use in their cars.

The second way that environmental taxes can work is through the re-allocation of the revenues collected. In its most simple form this can be expenditure to offset the detrimental effect of the damaging behaviour. A more sophisticated approach is to create a "virtuous circle" where the revenues collected are applied to projects that can directly re-enforce the desired behaviour change. For example the revenues collected from a tax on vehicles applied to creating better public transport systems, cycle routes and footpaths so as to give people a real alternative to using their motor cars.

The re-application of tax revenues in this way can also create a package that has a net neutral or even net positive effect on households. For instance a tax on energy use can be more than offset by support for energy efficiency measures that reduces energy consumption.

The optimal approach to environmental taxation uses both price signals and virtuous circle expenditure. To do this requires that any revenues generated are ring-fenced and not subsumed into general States coffers. And there must be confidence amongst the public that the environmental tax they pay goes directly toward measures that will help them reduce their damaging behaviours and benefit the environment.

To overcome practical difficulties in aligning income and expenditure in any single year the establishment of an environmental fund is proposed into which all environmental tax revenues are paid and out of which all related expenditure is committed.

The Council of Ministers have agreed that environmental taxes will be managed in this optimal way, with full hypothecation beyond the first call of replacing funding lost through the abolition of VRD, and the establishment of an Environment fund that will receive all environmental tax revenues and which can carry surpluses from year to year.

For 2008 only one environmental tax -a banded Vehicle Emissions duty - is proposed which if introduced will fund expenditure on transport plan initiatives, waste recycling and an energy efficiency programme. Environmental taxes on energy and waste are deferred pending progress on energy efficiency and recycling and the resolution of the Bellozanne covenant issue.

The consultation period runs until 4<sup>th</sup> May 2007 and responses are sought to the questions posed by the paper or on any other aspect of the document.

## **Background**

The concept of environmentally based taxes is not a new one and there are many examples of such taxes in operation throughout the world. During the debate on the Fiscal Strategy (P44/2005) a commitment was given to investigate the options for environmental taxes that would further Jersey's environmental objectives, specifically in the areas of Transport, Waste and Energy.

In addition the Minister for Treasury and Resources also made a commitment to look at alternatives to a Vehicle Registration Duty to be introduced in parallel with the introduction of GST.

Subsequent to the Fiscal Strategy debate the Council of Ministers brought forward its Strategic Plan for the period 2006-20011, which was adopted by the States. The Strategic Plan established environmental objectives and endorsed the role that environmental taxes would have in achieving these objectives.

Work on environmental tax options has been informed by detailed research carried out by the consultancy OXERA. In parallel to this work on environmental taxes, policy has been developed for both energy and transport, which has helped to refine the objectives in these areas.

This paper delivers the commitment given at the time of the Fiscal Strategy debate to investigate environmental tax options, including a replacement for VRD, and goes on to recommend specific proposals to be developed and introduced from 2008.

#### Introduction

Environmental taxes are fiscal mechanisms that are applied with the intent of reducing behaviours that are damaging to the environment. They may take the form of taxes, levies or charges but the defining factor is that they are introduced with the explicit purpose of bringing about a change that will benefit the environment. In this sense the ability of the tax to raise revenue is a secondary consideration although the re-application of such revenues to support behavioural changes is also an important function.

The successful use of environmental taxes can have positive benefits to individuals and to the economy. By changing behaviours and thus reducing demand the pressure for new or enhanced infrastructure can be reduced or avoided. This is especially important in an Island economy with a growing number of households. For instance a reduced demand for energy or water could avoid the predicted expenditure on new facilities (e.g. reservoir extensions, interconnectors) to cater for a growing population that is assumed to have the same consumption rates as now.

Environmental taxes that are cycled into support mechanisms such as grants for home energy efficiency can have very positive paybacks, with the benefit received by adopting the efficiency measures outweighing the cost of the tax.

Environmental taxes are not the appropriate tool to use where damaging behaviour needs to be stopped altogether or closely managed against limits. In these cases it would be better to use legislation and control or stop such behaviours by regulation.

Environmental taxes should also not be used where other options that might be simpler and cheaper could be deployed. For instance it would be cheaper to work with the three main food retailers in Jersey to introduce voluntary measures to limit the issue of disposable plastic carrier bags than it would be to set up a taxation infrastructure to achieve the same end.

Environmental taxes work in two main ways:-

Firstly they can work by increasing the cost of doing something to the point where people start to do less of that activity and so reducing demand. Some behaviours are very resistant to such price signals as people place great value on being able to continue their activity. An example of this is motorcar usage, where even large increases in fuel duty make little impact. There are potential pitfalls to taking this approach too far because of the variation in ability to pay that exists in society. Such tax proposals have to be carefully examined to ensure that the distribution of the effect does not fall disproportionately on low-income households.

A variation on this first way of working is when the tax causes a switch to another less damaging behaviour – often enhanced by setting a lower tax rate for the substitute. A good example of this is the switch that took place from leaded to unleaded fuel where leaded petrol was made progressively more expensive than unleaded leading to a major switch in what people use in their cars. This type of measure has the benefit that those people wishing to avoid the increase in tax can easily do so by changing their behaviour and so distributional factors are less of a problem.

The second way that environmental taxes can work is through the re-allocation of the revenues collected. In its most simple form this can be expenditure to offset the detrimental effect of the damaging behaviour. For instance in the UK a levy is placed on waste going to

landfill which generates a fund which is applied to environmental improvement projects such as habitat creation and management.

A more sophisticated approach is to create a "virtuous circle" where the revenues collected are applied to projects that can directly re-enforce the desired behaviour change. For example the revenues collected from a tax on vehicles could be applied to creating better public transport systems, cycle routes and footpaths so as to give people a real alternative to using their motor cars.

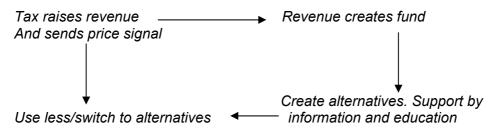


Figure C. 1 Virtuous circle

The re-application of tax revenues in this way can also create a package that has a net neutral or even net positive effect on households. For instance a tax on energy use can be more than offset by support for energy efficiency measures that reduces energy consumption i.e. energy is more expensive but your overall bill is lower because you need to use less. This can be a progressive measure as low-income households will commonly be spending a greater percentage of their household income on heating and therefore gain a greater benefit.

The optimal approach to environmental taxation will adopt both price signals and virtuous circle expenditure to re-enforce the overall effect. To do this requires that any revenues generated are ring-fenced and not subsumed into general States coffers. This is vitally important. To make it absolutely clear what behaviour needs to change, the tax that is raised must be levied directly at environmentally damaging behaviours - even if this is slightly less efficient than raising similar sums via general mechanisms such as GST or income tax. And there must be confidence amongst the public that the environmental tax they pay goes directly toward measures that will help them reduce their damaging behaviours and benefit the environment.

There are practical difficulties in trying to align income and expenditure in any single year and it may also be the case that it is desirable to fund expenditure before a related tax stream is fully on-line. To overcome these difficulties within our optimal approach there will need to be a method of smoothing out year to year variation and also in-year variation between the tax raised and the expenditure committed for any given objective. The proposed method is to establish an environmental fund into which all environmental tax revenues are paid and out of which all related expenditure is committed.



Figure C. 2 Income and expenditure model

The Treasury and Resources Minister and the Council of Ministers have agreed that environmental taxes will be managed in this optimal way, with full hypothecation beyond the first call of replacing funding lost through the abolition of VRD, and the establishment of an Environment fund that will receive all environmental tax revenues and which can carry surpluses from year to year.

The next section of this consultation document examines the options for taxes and related expenditure that will deliver the States' agreed policy objectives in the areas of transport, energy and waste. Particular attention is given to distributional issues that might arise as a result of the possible tax and spend measures.

## **Options for Environmental Taxes and related expenditure**

#### **Overview**

The approach taken in this analysis has been to identify a set of specific environmental objectives, outline a set of spending programmes that have been put forward to achieve these objectives, and then investigate the impact of the environmental taxes that would be required to fund these spending initiatives. The objectives and policies have been grouped into three categories covering energy, waste and transport. Within each of category the analysis has attempted to identify the impact of policies on:

- the achievement of the identified environmental objectives;
- other social and policy objectives;
- the distribution of costs and benefits within the economy and across the population.

The analysis in this report groups spending measures and related environmental tax measures together. This is because environmental taxes have the potential to help meet environmental objectives in their own right. If well designed, the method of raising revenue to fund spending schemes can therefore directly help to achieve the desired environmental objective.

However, there may also be non-economic factors that could be relevant. In particular, the non-economic effects of linking an activity causing environmental damage to a tax that pays for schemes that reduce or eliminate that damage may make such expenditure more acceptable to the taxpayer. They may also help change behaviour through non-economic pressure by making the costs of the damage caused by the activity more visible and, for example, subjecting the damaging behaviour to more peer pressure.

## 1. Energy

## **Environmental objectives**

Jersey's primary environmental objective relating to energy use is to reduce overall greenhouse gas emissions. While a formal specific target has yet to be agreed for the extent of this reduction, the Environment and Planning Department has indicated an aspiration to achieve annual carbon reductions of approximately 8,300 tonnes of carbon equivalent compared with current base case emissions. This target is broadly consistent with reducing annual emissions to 12.5% below 1990 levels (but ignoring the savings already achieved through changing the nature of our electricity supply). It is anticipated that the majority of these savings will be achieved through reductions in emissions of CO<sub>2</sub>, as opposed to other greenhouse gases.

There are three broad approaches that could be taken in reducing Jersey's carbon emissions:

- reducing overall energy consumption;
- decreasing the carbon content of the fuels used;
- offsetting Jersey's emissions through international carbon trading mechanisms.

Each of these approaches will potentially require a different set of policy measures and mechanisms and are therefore likely to have different impacts on the wider Jersey economy, and on the achievement of other objectives. For example, measures to improve energy efficiency would contribute to the Strategic Plan objective of reducing per-capita consumption of resources and, if targeted correctly, could also contribute to reducing fuel poverty. By contrast, the use of international trading mechanisms would provide little in the way of direct benefits to the Jersey economy and would not reduce on-Island emissions, but it is likely to be one of the more cost-effective means of Jersey contributing to global reductions in carbon emissions.

While it might be possible to identify a preferred approach for Jersey, in practice it may be necessary to use a combination of approaches to achieve Jersey's carbon reduction targets. The approach taken within this analysis has been to first consider a potential set of spending packages that could deliver this carbon savings target, and then to investigate the impact of a set of energy-related taxes that could be used to fund this spending package.

## **Background**

Compared with other developed economies, Jersey has relatively low levels of energy intensity and per-capita carbon emissions. This is due in part to the low reliance on energy-intensive industries within the Jersey economy, but has also been helped by the move away from on-Island electricity production towards electricity imports from France since 1999. Figure 1. 1 shows that, apart from the significant reduction in emissions from electricity generation, energy-related carbon emissions remain relatively unchanged from 1990 levels. These emission figures also show that homes and businesses account for more than 60% of total emissions, with road transport accounting for the majority of the remaining emissions.

180,000 - - All minus electricity generation 150,000 Domestic and business Total road transport Electricity generation 120 000 90,000 60.000 30.000 1997 1998 2000 2002 2005 1991 1992 1993 1995 1996 1999 2001 2003 2004

Figure 1. 1 Energy-related carbon emissions (tonnes of carbon)

Source: Jersey Statistics Unit.

Although the reliance on French imports means that electricity consumption results in relatively low on-Island carbon emissions, Jersey's electricity use does have an impact on French electricity generation levels and hence global carbon emissions. While it is the case that the majority of French electricity is provided by nuclear generators with low carbon emissions, the French electricity system as a whole is not carbon-free. In 2003 the average carbon content of electricity generated in France was 0.07kgCO<sub>2</sub>/kWh.¹ Furthermore, as there is a high degree of interconnection between electricity markets across northwest Europe, it could be argued that the marginal carbon impact of Jersey's electricity consumption could actually be higher than this.²

Table 1. 1provides a summary of the carbon-intensity assumptions used for each of the four main forms of energy consumption in Jersey.

Table 1. 1 Carbon intensity of energy consumption on Jersey (kgCO<sub>2</sub>/kWh)

Coal	Heating oil	LPG	Electricity
0.32	0.27	0.21	0.07

Note: LPG, liquefied petroleum gas.

Source: Defra and Oxera calculations based on IEA data.

These carbon-intensity assumptions have been used in conjunction with a breakdown of Jersey energy consumption from 2005 in order to provide an indication of the fuels with the greatest contributions towards total emissions. Table 1. 2 shows that carbon emissions appear to be distributed relatively evenly across the domestic, industry and States, and road

Oxera calculation based on data from IEA Energy Statistics.

As nuclear generation typically has low marginal costs, any reduction in Jersey's electricity demand would allow the French nuclear stations to sell more energy into other markets, thereby partially offsetting generation from fossil-fuel plants. Conversely, an increase in Jersey demand would reduce the amount of nuclear generation that could be sold to other markets and therefore potentially increase generation from fossil-fuel-fired stations.

transport sectors, with the majority of all emissions resulting from the use of petroleum products.3

2005 energy-related carbon emissions (tonnes of carbon) Table 1. 2

	Coal and other solid fuel	Petroleum products	Gas	Electricity	Total
Industry and States	_	21,183	2,939	6,118	30,241
Air and marine	_	14,925	_	_	14,925
Road	_	32,821	_	_	32,821
Domestic	2,375	22,960	4,111	5,655	35,101
Total	2,375	91,890	7,050	11,773	113,088

Note: LPG, liquefied petroleum gas.

Source: Oxera calculations based on energy consumption data from Jersey Energy Trends 2005.

The reliance on petroleum products within the non-transport sectors is primarily due to the absence of natural gas in the Island's energy mix.<sup>4</sup> As the majority of this energy use is related to providing space and water heating, these non-transport sectors offer the greatest potential to reduce carbon emissions, through improving the efficiency of boilers, increasing thermal insulation levels, or switching to less carbon-intensive fuels.

#### 1.1.1 Achieving carbon savings through energy efficiency

Energy efficiency measures are a key component in reducing carbon emissions, particularly from the domestic sector. In addition, by enabling less energy to be used for the same level of output (be that in industrial products or home heating), energy efficiency has the potential to contribute to other objectives such as increasing supply security, supporting economic growth through lower input costs and reducing fuel poverty.

In terms of the domestic sector, the greatest potential for energy efficiency comes from improvements in space and water heating, through measures such as retrofitting loft and cavity-wall insulation in houses, and improving the efficiency of domestic boilers. More modest, but still significant energy savings, could be achieved through energy-efficient lighting and household appliances. In terms of carbon savings, however, the relatively low carbon intensity of electricity consumption in Jersey means that these measures are likely to be less effective, although there may be some merit in pursuing these options simply to reduce overall energy use.5

Table 1. 3 provides a summary of the estimated costs and benefits of the main energy efficiency measures available in Jersey. These estimates have been built up from a variety of sources, taking into account Jersey housing stock and heating types, and using estimates of insulation levels based on data from the UK's Build Research Establishment (BRE). There is little information on which to base estimates of the energy efficiency potential from the business sector and public sector. However, the similarity in energy use with the domestic sector, and the lack of energy-intensive industries, suggest that similar levels of energy and carbon savings could be achieved if the efficiency of space heating could be increased.

<sup>&</sup>lt;sup>3</sup> Note that the estimates in Table 2.2 do not align exactly with the emissions figures shown in Figure 2.1. This is partly due to minor differences in the energy consumption data, but most significantly because the emission figures that underpin the calculations of this figure as used by the Statistics Unit assume a CO2 to carbon conversion factor of 3.792. Table 2.2 uses the atomic mass ratio of 44/12 as the conversion factor, which is equivalent to 3.6667.

Although there is some reticulated gas in Jersey, this takes the form of imported LPG, which is then regasified on the Island.

<sup>&</sup>lt;sup>5</sup> If a higher rate of carbon emissions from electricity consumption is assumed, the benefits of energy-efficient lighting and appliances would be greater.

Table 1. 3 Summary of domestic energy efficiency measures

	Loft insulation	Cavity-wall insulation	High- efficiency boilers <sup>2</sup>	Energy- efficient light bulbs
Per measure				
Installation cost (£)	240	260	173	4
Energy savings (kWh/year)	989	3,362	4,926	34
Energy cost savings (£/year) <sup>1</sup>	48	166	221 <sup>3</sup>	2
Carbon savings (kg/year)	55	179	363	0.6
Total potential on Jersey				
Number of measures	21,062	15,006	11,662 <sup>4</sup>	141,756 <sup>5</sup>
Energy savings (GWh/year)	20.8	50.5	574.5	48.2
Carbon savings (t/year)	1,154	2,689	4,230	92

Notes: <sup>1</sup> Assuming delivered energy costs of 4.4p/kWh for electricity, 6.7p/kWh for gas and 4.48p/kWh for oil. <sup>2</sup> Estimates based only on households using oil-fired boilers. <sup>3</sup> Estimated cost difference between conventional and condensing boilers. <sup>4</sup> Assumes 80% of oil-fired households currently use conventional boilers with a 65% heat-conversion efficiency, and that these would be replaced by condensing boilers at 85% efficiency. <sup>5</sup> Assuming that four light bulbs are installed in each household.

Sources: Öxera calculations based on a variety of sources, including Jersey in Figures 2005, Jersey Energy Trends 2005, BRE (2006), 'Domestic Energy Fact File', and Ofgem's 'EEC 2005–08 Technical Guidance Manual'.

While in many cases the cost of installing energy efficiency measures would be recovered in the long run through lower energy bills, experience in other countries has shown that consumers are often unwilling to install these measures without significant subsidies. A recent assessment of the UK's Energy Efficiency Commitment (EEC) showed that, on average, 53% of the direct costs of the measures installed under the scheme were subsidised by electricity suppliers, and that 100% subsidies were required in some cases. However, installation costs are not the only factor affecting the take-up of energy efficiency measures. A study conducted by Oxera as part of the UK government's review of energy efficiency indicated that, while the upfront costs of energy efficiency measures were important to consumers, other issues such as the 'hassle factor', distrust of the supply chain, and lack of awareness of the long-term benefits of measures, were also significant factors in the uptake of energy efficiency products. As a result, the most effective energy efficiency programmes place significant emphasis on awareness-raising, information and education campaigns.

#### 1.1.2 Subsidising fuel switching

The high proportion (approximately 40%) of homes heated with oil in Jersey suggests that there could be potential for significant carbon savings through encouraging consumers to switch to less carbon-intensive forms of water and space heating, particularly electricity. In order for fuel switching to be attractive to consumers, it would have to result in lower unit energy costs. As Table 1. 4 shows, the cheapest form of heating, night-rate electricity, is also the energy source with the lowest carbon emissions per kWh of effective heat, and therefore there could be some potential for fuel switching in Jersey. However, this potential could be undermined by future changes in energy prices. The final price of heat from the most efficient oil boilers is already quite close to that of night-rate electricity. A 10% reduction in oil prices relative to night-rate electricity would therefore erode the cost advantage of electric heating.

<sup>&</sup>lt;sup>6</sup> Defra (2006), 'Assessment of EEC 2002–05 Carbon, Energy and Cost Savings', April.

 $<sup>^{7}</sup>$  Defra (2005), 'Energy Efficiency Innovation Review: Summary Report', December.

Table 1. 4 Relative cost and carbon emissions for different fuel types in Jersey

Heating type	Heating efficiency (%)	Cost (p/kWh of effective heat)	Carbon emissions (kg CO₂/kWh of effective heat)
Coal open fire	32	13.20	1.00
Coal open fire with back boiler	55	7.68	0.58
Gas central heating with existing boiler	65	10.31	0.33
Gas central heating with combi boiler	73	9.18	0.29
Gas central heating with condensing boiler	85	7.88	0.25
Oil central heating with existing boiler	65	6.3	0.42
Oil central heating with combi boiler	79	5.2	0.34
Oil central heating with condensing boiler	85	4.8	0.32
Electricity standard domestic rate	100	8.52	0.07
Electricity E7 night rate	100	4.5	0.07

Source: Jersey Electricity Company and Oxera calculations.

A significant barrier to fuel switching is the upfront costs that would be incurred in changing supply infrastructure and appliances. While such barriers could potentially be overcome through subsidising these switching costs, the level of subsidy required is likely to be high.

Another factor influencing consumers' decisions regarding heating is the issue of comfort. Homes fitted with central heating are generally heated to a higher average temperature than those using spot heating options, such as electric or portable butane heaters. Some consumers place a significant value on this additional comfort, thereby reducing the incentives to switch to electric heating. While it might be possible to achieve similar levels of heating with electric night storage heaters, these heaters allow for less control over the timing of heat provision and so are not necessarily viewed as an equivalent substitute for central heating. Moreover, if some additional heating is required using standard-rate electricity, the cost savings of electric heating may not arise.

Notwithstanding the discussion above, the current relative fuel prices do provide some scope to encourage consumers to switch away from gas and oil heating. These incentives could be sharpened through promoting and/or subsidising night storage heaters and electric hot water cylinders. Using data from the 2005 Jersey energy trends, Oxera estimates that there are around 14,500 households in Jersey relying on oil-fired boilers for space and water heating. The average annual oil consumption of these households is approximately 21,000kWh (gross). Assuming that a conventional boiler is used, the average net heat consumption will be in the order of 14,000kWh. Assuming the same net heat demand is needed for night storage heaters, the annual cost savings for consumers switching to electric heating would be in the order of £250, and would achieve carbon savings of close to 1.3tC. However, if the oil-fired boiler is the latest condensing type, the cost savings are considerably lower—in the order of only £40 per year—and the carbon savings less than 1tC, reflecting the increased efficiency of the condensing boiler.

These estimates suggest that the overall financial incentive for consumers to switch to electric heating from oil is relatively small in many cases. Even where the potential savings are significant, for the reasons set out above, the actual savings may be lower if some of the heating load in the electrically heated house is satisfied by full-price electricity. Therefore, to make fuel switching contribute to the achievement of any carbon-reduction objective, it is likely that an additional incentive—in the form of a subsidy for electricity, or a tax on oil (or both)—would be required.

#### 1.1.3 Road transport and aviation emissions

Carbon emissions from the road transport and aviation sectors are likely to be more difficult to address due to the relatively low impact that fuel costs have on private vehicle use and the ability of the aviation sector to avoid any Jersey-based tax measures.

The impact of fuel duty taxes for road vehicles is discussed in section 3 in terms of its revenue-raising capacity and the impact it could have on vehicle use. A similar approach based on taxing aviation fuel is unlikely to be workable, since airline operators would simply refuel off the Island. Other approaches, such as passenger charges or levies on aircraft movements, might be less avoidable.

As demand for air travel is relatively insensitive to price, high levy rates might be required in order to make any material difference to demand for flights and thereby to aircraft emissions from flights to and from Jersey. In addition, an application of tax in Jersey is unlikely to have much impact on the aircraft being used (ie, to induce switching to more fuel-efficient aircraft), so any reduction in emissions would need to arise either from a reduction in the frequency of services or the use of smaller aircraft, which may have higher emissions per seat-km.

Levies applied only to Jersey routes are likely to have little impact on the global aircraft emissions, even if they succeeded in reducing the emissions on routes to and from Jersey. This is because potential inbound tourists discouraged from flying to Jersey by higher flight costs may substitute alternative destinations that involve an equal (or even greater) emission of carbon. The impact of a Jersey levy on *global* carbon emissions would probably have to come mainly from Jersey residents who fly less often, or who take ferries for their journeys.

Finally, levies that were effective in reducing demand for air travel to and from Jersey are likely to have a significant detrimental impact on the Jersey tourism industry. For these reasons further consideration has not been given to any explicit measures targeted at the aviation industry.

## Spending packages

The Council of Ministers will shortly release for consultation a detailed set of energy policies that will address, among other issues, programmes to improve energy efficiency and reduce energy-related carbon emissions. This will allowed specific targets and expenditure programmes to be defined in more detail. However, it is possible to provide a broad indication based on comparisons with other energy efficiency and carbon-reduction programmes, most notably the UK's Energy Efficiency Commitment (EEC). An alternative spending approach would be through purchasing Certified Emission Reductions (CERs) on the international market. The implications and level of funding required under each of these approaches are discussed below.

## 1.1.4 Spending programme based on the UK Energy Efficiency Commitment

The EEC is an obligation on electricity and gas suppliers to achieve fixed targets for the promotion of improvements in domestic energy efficiency. The first EEC period (2002–05) is expected to deliver annual carbon savings of 0.49MtC through a combination of measures including subsidising the cost of insulation, boiler upgrades, fuel switching and energy-efficient appliances, as well as promoting various energy-efficient products.<sup>8</sup> It has been estimated that the total cost to energy suppliers of achieving these carbon savings was £410m, of which £323m took the form of direct subsidies, with the remaining £87m representing suppliers' indirect costs, relating to marketing, administration and monitoring.<sup>9</sup> The average cost of delivering carbon savings through the EEC has been approximately £840 per tonne of carbon saved per year.

<sup>9</sup> Eion Lees Energy (2006), 'Evaluation of the Energy Efficiency Commitment 2002–2005: A Report to Defra', February.

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<sup>&</sup>lt;sup>8</sup> Defra (2006), 'Assessment of EEC 2002–05 Carbon, Energy and Cost Savings', April.

Clearly there are differences between the UK and Jersey in terms of energy use patterns and the nature of the housing stock. However, the EEC figures provide a reasonable basis for estimating the costs of a Jersey-based energy efficiency programme. While Jersey's higher reliance on oil-fired space and water heating might suggest the potential for greater carbon savings as a result of insulation and boiler efficiency measures, these are likely to be offset by higher average temperatures and a lower assumed level of carbon emissions from electricity consumption.

Using the EEC cost-effectiveness figure as a starting point, it is estimated that estimates that Jersey could achieve its carbon-reduction target of 8,300t/year at a total cost to the States of around £7m. In addition to States' expenditure, the EEC analysis suggests that energy consumers would also need to contribute around £4.8m in order to achieve these savings. This total expenditure of around £12m would be more than offset by the reduction in energy costs, which is conservatively estimated to be around £60m over the lifetime of the measures.<sup>10</sup>

It is likely to take several years before the delivery of carbon savings through an energy efficiency programme would reach the 8,300tC/year target. It has therefore been assumed that the funding requirements for this approach will be around £1.4m per year over a five-year period.

#### 1.1.5 Purchasing Certified Emissions Reductions

Although Jersey is a signatory to the UN Convention on Climate Change, it has no specific carbon-reduction targets of its own, and already has relatively low levels of per-capita carbon emissions. Therefore, if the main intention of Jersey's greenhouse gas objective is to contribute to global emissions reductions, the most efficient and effective way to achieve this might be through the use of the flexibility mechanisms within the Kyoto Protocol rather than by reducing its own, on-Island, emissions. The most prominent of these, the Clean Development Mechanism (CDM), allows developed countries to invest in climate change mitigation projects in the developing world and claim the emission reductions of these projects against their own targets.

There is a relatively deep and active international market in carbon savings arising from CDM projects, which would currently allow Jersey to purchase CERs for around £33/tC. <sup>11</sup> This approach would allow Jersey to meet its carbon-reduction target at an annual cost of around £275,000. However, in contrast to investments in energy efficiency, this approach would represent an ongoing cost to the economy rather than an upfront investment in energy saving. A comparison between these two approaches can be made based on the net present value (NPV) of purchasing CERs across the expected lifetime of energy efficiency measures that could be employed. Oxera has estimated this NPV to be approximately £3.9m based on a real discount rate of 3.5% and a 20-year period. <sup>12</sup>

## 1.1.6 Comparison of spending options

While the above analysis suggests that purchasing CERs might be a less costly approach for Jersey to reduce global carbon emissions (£3.9m compared with £12m), there are several drawbacks. The most significant of these is that buying CERs would impose a cost on the Jersey economy without providing any direct benefits. By contrast, measures to reduce on-Island energy consumption will result in significant energy cost savings (£60m) and at least some proportion of the costs of these measures would be recycled within the Jersey economy (eq. the economic activity of installing cavity-wall insulation). Overall, the

<sup>&</sup>lt;sup>10</sup> This estimate has been made by pro-rating the £3.7 billion energy cost savings estimated for the EEC down to the Jersey carbon-saving target. As the cost of energy products in Jersey are generally higher than in the UK, this approach is likely to underestimate the cost savings that could be achieved on Jersey.

<sup>&</sup>lt;sup>11</sup> Source: Point Carbon (2006), 'CDM and JI monitor', September.

<sup>&</sup>lt;sup>12</sup> This discount rate is consistent with the UK Treasury 2003 Green Book, 'Appraisal and Evaluation in Central Government'.

economy of the Island is likely to benefit more by installing energy efficiency measures rather than buying CERs, even at this low price.<sup>13</sup>

Another disadvantage of relying on CERs is that it would leave Jersey exposed in the long term to movements in the international price of these credits. While the cost of CERs are currently quite low due to the relatively high availability of projects, there is a possibility that prices in the future could increase as the cheapest options begin to be fully utilised. For these reasons Oxera has assumed that Jersey's spending programme is more likely to focus on local energy efficiency measures rather than international carbon trading.

## **Energy-related environmental taxes**

The discussion above indicated that it would be necessary to raise £1.4m per annum in order to fund an energy efficiency programme for Jersey capable of delivering the Island's carbon-reduction target of 8,300tC per year over a five-year period. One way in which this funding could be provided is through the introduction of additional taxes on energy consumption. In addition to funding the energy efficiency measures, such taxes could also make a direct contribution towards the carbon-reduction targets by providing an incentive for consumers to reduce energy demand or, depending on the design of the tax, to switch to less carbon-intensive fuels. A downside of these taxes is that, by increasing energy purchase costs, they could potentially increase the incidence of fuel poverty in Jersey. This section investigates the likely tax rates that would be required, the direct impact of these rates on energy demand and carbon emissions, and the distributional impact of energy consumption taxes.

#### 1.1.7 Required tax rates

If the primary objective of energy consumption taxes is to raise sufficient revenue to fund the energy efficiency programme, the simplest approach might be to increase the GST rates for energy products. It is estimated that £1.4m could be provided with an additional 1.3% tax on all non-transport-related purchases of energy products. While a simple flat rate of tax based on the GST system might benefit from relatively low additional administrative burdens, the revenue raised would be sensitive to changes in energy prices. Regular reviews of the tax rates would be required in order to ensure that the tax generated an appropriate level of revenues.

Another drawback of a flat tax rate approach is that it would not necessarily target the tax towards the most carbon-intensive forms of energy use. An alternative mechanism would be to levy taxes on the basis of the carbon content of the fuel, in effect a carbon tax. Table 1.5 provides a summary of the effective tax rates required under each of these mechanisms in order to raise £1.4m per annum. Not surprisingly, taxes targeted at the carbon content of fuels would result in higher rates for heating oil and coal and lower rates for electricity than the flat-rate tax approach.

<sup>&</sup>lt;sup>13</sup> This difference between buying CERs and installing energy efficiency measures arises because the energy efficiency measures are mainly economic in their own right. Unless there are very large economic costs for consumers that have not been captured in the analysis, there is no net economic cost to the Island in putting these measures in place, irrespective of whether the measures would also deliver any environmental benefits either locally or globally.

<sup>&</sup>lt;sup>14</sup> This figure has been calculated according to an estimated total value of non-transport-related energy consumption of £105m in 2005.

Table 1. 5 Tax rates under different options

	Electricity	Gas	Heating oil	Coal
Annual consumption (GWh)	617	123	717	27
Current price (p/kWh)	8.52	6.7	5.7	11.5
Flat tax				
Tax rate (p/kWh)	0.11	0.09	0.08	0.15
Tax rate (%)	1.3	1.3	1.3	1.3
Implicit carbon value (£/tC)	59.7	15.7	11.6	17.6
Carbon tax				
Tax rate (p/kWh)	0.04	0.12	0.13	0.18
Tax rate (%)	0.5	1.8	2.4	1.6
Implicit carbon value (£/tC)	20.5	20.5	20.5	20.5

Source: Oxera calculations.

While carbon taxes would provide a better reflection of the carbon impact of energy consumption, the tax rates shown in Table 1.5 would not provide a significant incentive for consumers to switch to lower carbon-content fuels. Another approach that has been suggested is to create fuel-specific tax rates to equalise the cost of heating to that of the lowest carbon option (electricity); however, there would be a number of problems associated with such an approach.

At current prices, and taking into account the conversion efficiency of different heating types, night-rate and convector heaters would be charged the higher-standard domestic rate, and the tax rates required to make this competitive with heating oil are unlikely to be acceptable to the public. Table 1. 6 shows the tax rates required to equalise the cost of fossil-fuel heating with standard domestic-rate electricity.

Table 1. 6 Impact of taxes based on cost equalisation

Fuel	Cost per useful kWh (p) <sup>3</sup>	Effective tax rate (p/kWh input)	Implicit carbon tax rate (£/tC)	Total revenue generated (£m)
Electricity	8.52	0	0	0
Gas <sup>1</sup>	7.88	0.54	95	0.7
Heating oil <sup>1</sup>	4.82	3.14	480	22.5
Coal <sup>2</sup>	7.45	0.69	80	0.2

Notes: <sup>1</sup> Based on new condensing boiler with 85% thermal efficiency. <sup>2</sup> Based on open fire with back boiler. <sup>3</sup> Based the Jersey Electricity Company August fuel cost comparison. Source: Oxera calculations.

The analysis suggests that these cost-equalising taxes would mostly be targeted at heating oil, and could raise revenues in excess of £23m per annum. In order to achieve this price equalisation, however, the tax rates on heating oil would have to be extremely high, approximately 65%. It is questionable whether such high rates of tax would be acceptable. The implicit carbon value implied by the tax on heating oil would also be significantly in excess of the size of the negative externality that the tax is designed to address. A further drawback of price-equalising taxes is that the rates applied to different fuels would need to

<sup>&</sup>lt;sup>15</sup> The UK government assumes a social cost of carbon emission of £70 £/tC in 2000 terms within a range of 35 to 140 £/tC and rising by £1/tC per year. Source: HM Treasury (2002), "Estimating the social cost of carbon", January.

be periodically adjusted to account for movements in the prices of different energy sources. Such adjustments could increase the administrative costs of the tax and result in uncertainty over future revenue levels.

Such tax rates would also be expected to result in quite significant changes in fuel use, as full-price electricity (which all households will already have access to) becomes the cheapest fuel, and would be significantly cheaper than existing, non-condensing, oil- and gas-fired central heating and open coal fires without back boilers. Cheap-rate electricity (ie, night storage heating) would be significantly cheaper than any other form of heating, and in the long term it would be expected that most heating would change to cheap-rate electricity. This would reduce the tax-take significantly, but would also significantly reduce carbon emissions. On balance, however, it has been assumed that administrative difficulties and high rates of tax on heating oil mean that this approach is unlikely to be adopted in Jersey. The remainder of this section therefore concentrates on the potential impacts of the flat tax and carbon tax options.

#### 1.1.8 Impact on energy demand and carbon emissions

The application of a tax on energy consumption can have a number of impacts. By making fuel more expensive, consumers will, to some extent, consume less of it, which directly reduces demand. However, this also reduces their welfare because the benefit derived from the fuel use is also reduced. With an increase in the price of fuel, consumers may also choose to invest in energy efficiency measures because the economic payback on these investments improves. Expenditure on fuel still declines, but the loss of welfare is lower, since the fuel that is consumed delivers greater benefits. Finally, if the tax creates a change in the relative price of fuels, consumers may also switch between fuels, as well as reducing their overall consumption.

While it is generally accepted that energy consumption is relatively insensitive to changes in price, various econometric studies have indicated the own-price elasticities for energy products to be significantly different from zero. While most of these studies indicated relatively low short-run elasticities, the long-run impact of price changes were estimated to be higher. Estimates of the short-run elasticity of total energy demand typically fall within a range of -0.13 to -0.26, with long-run elasticities in the range of -0.37 to -0.46. More targeted studies on residential electricity demand indicate ranges of between -0.158 to -1.1 in the short term and -0.2 to -1.1 in the long run. These estimates suggest that, even at the bottom end of the ranges, there could be some scope to reduce energy consumption through the use of taxes.

These elasticity estimates, however, may not be directly applicable to Jersey and should therefore be treated with some caution. Demand response due to price changes is likely to be highly sensitive to individual economies, the composition of demand and the fuel mix employed. Notwithstanding these caveats, An assumed average demand elasticity of -0.3 has been used to provide an indicative measure of the energy and carbon savings that could be achieved purely through the price effect of energy consumption taxes. Table 1. 7 summarises the level of savings that might be obtained with tax rates designed to raise £1.4m per annum.

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<sup>&</sup>lt;sup>16</sup> For a summary of many of these studies see OECD (2006), "The political economy of environmentally related taxes", June. <sup>17</sup> Ibid

Table 1. 7 Impact of energy taxes on demand and carbon emissions

Fuel	Tax rate (p/kWh)	Reduction in energy demand (GWh)	Reduction in emissions (tC)	
Flat tax		6.0	274	
Electricity	0.11	2.5	47	
Gas	0.09	0.5	28	
Heating oil	0.08	2.9	189	
Coal	0.15	0.1	10	
arbon tax		6.7	398	
Electricity	0.04	0.8	16	
Gas	0.12	0.6	37	
Heating oil	0.13	5.1	333	
Coal	0.18	0.1	11	

Source: Oxera calculations.

The greater targeting of taxes under the carbon tax option is likely to result in slightly higher levels of energy savings and a significantly higher level of carbon saving. However, in both cases the level of carbon saving achieved purely by the tax measure itself is relatively small when compared with the level of carbon savings expected from the spending package.

#### 1.1.9 Distributional impacts of energy consumption taxes

The introduction of energy consumption taxes has the potential to have a disproportionate impact on different sectors on the economy and across different income groups. At a high level, applying a broad-based tax to all energy users would have a similar impact on both the domestic sector and the industrial and States sector due to the similar level and structure of energy demand for these sectors. However, within each of these sectors there is potential for significant distributional impacts. While it might be possible to mitigate some these impacts through exemptions for certain consumer groups, such exemptions would increase the tax burden on the rest of the economy and potentially undermine the effectiveness and efficiency of the tax regime in providing environmental benefits.

Data from the States of Jersey's 1998 input/output tables suggests that the two industrial sectors with the greatest overall energy use are: wholesale and retail trade; and hotel, restaurant and catering. However, as Table 1. 8 shows, other sectors have a higher energy spend as a proportion of the their gross value added (GVA), with agriculture and fishing being the most energy-intensive non-public sector group.

Table 1. 8 Economic sectors with highest energy intensity (1998)

	Spend on energy (£m)	Energy costs as a proportion of GVA (%)
Public services	1.5	11.1
Water	0.6	9.1
Agriculture and fishing	2.0	6.9
Manufacturing	2.6	6.0
Recreation, culture and sport	1.3	4.8
Sea and air transport and transport support	2.5	4.5
Hotels, restaurants and catering	5.7	3.8
Health, social work and housing	3.3	2.8
Wholesale and retail trade	5.9	2.2

Source: States of Jersey.

Jersey's main export—international financial services—has a very low energy input as a proportion of GVA, in the order of less than 0.03% for banks and building societies. Energy costs are also a small proportion of direct costs of international financial services—in the order of less than 0.5%. However, tourism, the other main export industry, is more energy-intensive, with direct energy costs approaching 5% of total costs in 1998. These relationships suggest that a flat tax rate of 1.3% on energy prices would translate into an increase in costs to the financial services sector of less than 0.007%, and 0.07% for the tourism sector. Under the carbon tax approach, there would be an even greater differential impact, as the financial services sector's direct energy use is almost entirely electricity-based, while the tourism sector is more reliant on oil, with around 25% of its direct energy supplies represented by oil. In either case there is significant potential for the direct costs on energy taxes to be more than offset by the energy savings if businesses participate in the energy efficiency programme.

For domestic consumers, energy taxes would have the greatest proportional impact on low-income households, which on average spend a higher proportion of their income on energy. Table 1. 9, shows the average weekly household spend on energy in Jersey by income quintile, and the increase in spend that would occur under both tax options discussed above. Table 1. 10 presents similar information but expressed as a percentage of total household income.

Table 1. 9 Impact of energy taxes on household energy expenditure

	Income quintile					
Fuel	1	2	3	4	5	Average
Current spend on energy (£/week)	11.4	10.2	15.2	21.1	30.1	17.6
Flat tax						
Cost of tax (£/week)	0.24	0.22	0.34	0.47	0.74	0.40
Increase in energy costs (%)	2.1	2.1	2.2	2.2	2.5	2.3
Carbon tax						
Cost of tax (£/week)	0.22	0.19	0.33	0.47	0.89	0.42
Increase in energy costs (%)	1.9	1.9	2.1	2.2	3.0	2.4

Source: Oxera calculations based on Jersey Household Expenditure Survey 2005.

Table 1. 10 Proportion of household income spent on energy (%)

	income quintile					
Fuel	1	2	3	4	5	Average
Current spend	4.1	2.7	2.6	2.5	2.0	2.5
Tax based on social cost of carbon	4.2	2.7	2.6	2.5	2.1	2.6
Tax based on cost equalisation	4.2	2.7	2.6	2.5	2.1	2.6

Note: Average income levels in each quintile were estimated from the total expenditure. Source: Oxera calculations based on Jersey Household Expenditure Survey 2005.

These tables indicate that energy consumption is generally regressive, falling as a proportion of income with increasing levels of income, although the absolute amount spent on energy tends to rise as income levels rise. Under either the flat tax or carbon tax options, the impact on households of raising £1.4m per year would be relatively small, starting at 22–24p per week for the low-income households, and rising to 74–89p per week in the highest-income quintile. This would represent a 1.3–3% increase in energy bills. Both tax options have similar distributional effects, although the carbon tax would be slightly more progressive due to the higher proportion of heating oil consumed by high-income households. This is likely to reflect the fact that oil (or even gas) central heating is more common in these quintiles, while electric heating is more common in the lower quintiles.

Table 1. 10 shows that the average proportion of income spent on energy still remains relatively small, even for low-income groups. However, although the average impact of the tax on household bills is limited, and has a progressive nature (in terms of expenditure on energy), there could still be some distributional impact *within* the income groups, particularly if the carbon tax option is employed. If the energy taxes are more targeted towards oil and coal consumption, there will be a greater impact on households relying more on these fuels. While, on average, lower-income households rely more on electric heating, Oxera estimates that around 1,500 low-income households are heated with oil. The impact of carbon taxes on these households is likely to be more than twice the average impact for this income quintile. Despite this, the relatively low proportion of household income spent on energy suggests that the introduction of energy taxes at the levels envisaged in this analysis would be unlikely to have a significant impact on the incidence of fuel poverty on Jersey.<sup>18</sup>

#### Combining taxes and spending

Because the price elasticity of demand for fuel is low, and there appear to be quite significant barriers to householders taking up energy efficiency measures that appear economically rational, an approach to either fuel switching or increasing fuel efficiency, based solely on fiscal measures, is unlikely to be effective. Householders are also likely to require information and education about what is available, what advantages it would bring to them and how to practically go about achieving the increased efficiency. The EEC scheme in the UK is an example of where this approach is being tested.

Such schemes come with a cost, which has to be funded. If funded from the sale of fuel, this is equivalent to a hypothecated tax. The beneficiaries of the tax are those consumers who engage with the offer of information, help and/or subsidised energy efficiency measures. When implemented in this form there is a distributional effect over and above the pure fiscal effect of any tax (or its equivalent). This impact comes from the timing effect of the

<sup>&</sup>lt;sup>18</sup> Although there is no formal definition for fuel poverty in Jersey, the UK government defines fuel-poor households as those that need to spend more than 10% of household income to remain adequately heated.

intervention and the fact that not all consumers may take up the offer, or be capable of taking up the offer, if their dwelling is unsuitable for the subsidised measure. All consumers of the taxed product pay for the advice, help, etc, but only those who take up the offer benefit. By targeting low-income groups for the benefits of intervention, the negative distributional consequences of the tax can be at least partially mitigated.

## **Proposals**

There is tremendous scope in Jersey to increase energy efficiency. The achievement of greater energy efficiency will benefit the individual user directly and also the economy in general by reducing net imports of energy.

Previous surveys have shown a high degree of awareness amongst Jersey households about the need for greater energy efficiency but with levels of take-up that could easily be improved. It is likely that this finding will be repeated in the Jersey Annual Social Survey to be published shortly.

Mechanisms are needed to help people make informed choices and to give direct financial support for the uptake of measures. Information will be made available through the ECO-ACTIVE programme to assist in informed decision-making. A dedicated advisory body capable of giving hands-on advice to business and households could back this up and could administrate a grant regime for energy efficiency and micro-generation technologies. In the first instance this programme could be organised to give the most help to low-income households.

The programme would be funded at £1.4 m per annum from the Environment Fund i.e. from the income generated by environmental taxes. The Council of Ministers would wish to see considerable progress on energy efficiency measures before bringing forward any environmental tax proposals for energy i.e. to achieve as much as possible through support mechanisms before bringing in taxes on energy. Such taxes could be brought in a later date if it was necessary to "raise the bar" for energy efficiency performance.

#### Questions

Q1.	, .	agree that practical support from the States for energy efficiency measures ag information and grants is desirable?				
	1.1 1.2	Information Grants	Yes □No Yes □No			
Q2.	Q2. Should such measures be targeted at low-income households initially?					
	2.1	Yes □No □				
Q3.	3. What measures deserve to be supported by grants?					
	3.1	None				
	3.2	Home insulation				
	3.3	Energy efficient boiler	rs 🔲			
	3.4	Photovoltaics				
	3.5	Solar heating				
	3.6	Micro wind generation	n 📮			
	3.7	Others (please descri	be)			

#### 2. Waste

## **Environmental objectives**

The States of Jersey Solid Waste Strategy sets out a vision for changing the community's attitudes towards waste. The vision encompasses an objective to minimise waste production, and responsibly manage the waste that cannot be avoided in a way that minimises the impact it has on the environment and health of the community. Consistent with these broad goals, several specific objectives have been identified.

- Reducing the amount of non-inert waste going into the energy from waste (EfW) station. The current EfW plant is old and polluting, and each tonne of waste sent to this plant releases harmful gases into the atmosphere. Furthermore, only 80% of the mass of waste entering the facility is burnt off—the remaining 20% (ash and unburnable material) is in turn sent to landfill. Although the EfW plant is due to be replaced, the reduction in waste sent to the plant remains an important goal, since there is limited capacity at the EfW and landfill sites, as well as a net cost of £30–£35 per tonne of burning the waste.<sup>19</sup>
- Increasing the level of participation in recycling programmes and overall recycling tonnage, and widening the range of types of material recycled.
- Reducing the amount of inert waste going to landfill in order to extend the lifetime of the existing site.

More specific targets are provided in the Solid Waste Strategy as regards recycling levels. The overall aim is to increase recycling and composting levels to 32% of all waste arisings by 2009. Contained within this goal are specific recycling rate targets for different material, as set out in Table 2. 1

Table 2. 1 Target recycling rates (%)

Material	Target recycling rate		
Paper and cardboard	50		
Glass	90		
Metal	85		
Plastics	10		
Timber	50		
Green waste	90		
Electrical equipment	60		
Inert waste	30		

Source: States of Jersey (2005), 'Solid Waste Strategy', May.

There is a certain amount of interaction between these objectives, with increased recycling being one of the mechanisms for reducing the amount of waste sent to the EfW site, and limiting the volume of waste incineration resulting in lower volumes of ash being sent to landfill. Despite these interactions, it is clear that other mechanisms will need to be brought forward to lead to reductions in overall waste arisings.

Within the Solid Waste Strategy, the main spending programmes related to these objectives focus primarily on increasing recycling rates, through the expansion of the existing bring

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<sup>&</sup>lt;sup>19</sup> Source: States of Jersey.

bank scheme and the introduction of kerbside sorting or co-mingled collection. In addition to the direct costs of these programmes, the recycling levels envisaged by the waste strategy will result in increased processing costs and capital expenditure of approximately £5.3m in order to provide a new 'Reuse and Recycle' centre and composting facility.<sup>20</sup> This analysis has not explicitly considered the use of environmental taxes to fund this capital programme, focusing instead on the potential for charges on waste disposal to contribute to the waste reduction costs and to cover the operational costs of the proposed recycling programme.

#### 1.1.10 Background context

Currently, the 12 parish authorities are responsible for the collection of municipal waste, which they do on a weekly basis for general waste, and fortnightly or monthly for glass.<sup>21</sup> Household waste is currently sent in the first instance to the EfW plant at Bellozanne. The ash from this plant, along with other inert waste mainly from the construction industry, is sent to the landfill site at La Collette.

There are ongoing discussions regarding the nature of the relationship of the Parish of St Helier to the Bellozanne plant due to conditions placed on the contract of its sale from the Parish of St Helier to the whole Island (the covenant). It can be interpreted that the Bellozanne plant is obliged to accept refuse free of charge to residents of the parish of St Helier<sup>22</sup>, however other opinions challenge this view.

The presence of this covenant potentially limits the economic instruments that could be used to aid the effective implementation of the waste strategy. However, as there has been some discussion that the covenant could be relaxed, this analysis has assumed that waste disposal charges could be levied on Bellozanne.

Currently, Jersey produces 330,000 tonnes of solid waste per year, which is broken down into various types as shown in Table 2. 2

Table 2. 2 Breakdown and destination of Jersey waste arisings

Туре	Tonnage	Current destination
Green waste	12,500	Composted
Cans, paper, glass, timber and other recyclable	9,739	Recycled
Inert waste from construction	230,087	Landfill
Household, clinical and sewage treatment arisings	76,540	EfW, then 16,331 tonnes ash to landfill
Hazardous	471	Exported to UK

Source: Jersey Solid Waste Strategy.

## Spending packages to achieve goals

As discussed previously, the main spending requirements identified within the Solid Waste Strategy relate to increasing recycling rates through expanding the bring bank system and potentially introducing kerbside recycling collection. The Solid Waste Strategy also envisages that, in addition to the costs of these collection programmes, additional funding will be required to cover the increase in processing costs that would result from meeting the recycling targets.

<sup>&</sup>lt;sup>20</sup> Source: States of Jersey (2005), 'Solid Waste Strategy', May.

<sup>&</sup>lt;sup>21</sup> Glass collection in St Helier is managed through bring banks.

As the covenant makes no distinction between commercial and residential waste, it is assumed that this arrangement applies to all waste arisings in the parish.

#### 1.1.11 Expansion of the bring bank recycling scheme

Jersey currently employs a bring bank system for the recycling of materials. Bring bank systems are one of the simplest (for the operator) forms of recycling and as such are relatively cost-effective when compared with kerbside or co-mingled recycling. The main weaknesses of such a scheme are that it is incumbent on residents to take their waste to the sites (as opposed to leaving it outside their homes, as with a kerbside system), and the fact that the alternative to recycling is currently free at the point of disposal.

Another key problem identified in the Solid Waste Strategy was the lack of a location with facilities for accepting recyclable material. For example there are many places that accept aluminium cans, but few that accept cardboard. The success of a bring bank scheme is to a large extent dependent on the convenience of the disposal options to residents. In the UK, a study of public attitudes found that 43% of the population who did not recycle aluminium cans said that the distance to a facility or lack of a facility were the major reasons for this.<sup>23</sup> Therefore, a key goal identified by the waste strategy is to increase the number and range of bring banks, and their placement in convenient places such as supermarket car parks.

Since a car parking space has a value to the supermarket that would be lost if a bring bank were placed there instead, increasing the scope of the system typically carries a cost. In future developments, the provision of new recycling facilities is required by Jersey planning law; the cost of this space is therefore borne by the developer. However, land costs for facilities at existing developments are still an issue.

Land rent is only one of the costs associated with a bring bank scheme. To be effective, the contents of the Island bring banks must be regularly collected and processed. Increasing the number of facilities will necessarily incur more costs of collection and processing. However, this increase is not directly proportional, since new locations can be combined into existing vehicle collection routes, which will only marginally increase transport and driver wage costs. The Solid Waste Strategy estimates that £150,000 per annum would be required to fund the proposed bring bank network.

#### 1.1.12 Kerbside collection

Although expanding the current bring bank network is likely to increase recycling levels, it may be difficult to achieve the stated recycling targets through this system alone. Instead it may be necessary to introduce a different form of collection for recyclable material, either instead of, or in conjunction with, the bring bank network.

The most convenient methods of recycling from the public's perspective is kerbside collection, where households put their recyclable materials into separate containers and these are either sorted directly into the collection vehicle or co-mingled and sorted at a recycling facility.

The costs of kerbside collection depend on a number of factors, including population density, vehicle availability, and the range of materials collected. Estimates of costs from the UK vary between £7.50 and £20 per household per year, the average being £11.50. The average net cost, after the sales from recycled materials have been taken in to account, was £9.<sup>24</sup> It is assumed that the gross benefits from a scheme in Jersey would be negated by the high costs of transporting recyclable materials off the Island, and therefore the average net cost per household would be higher—possibly considerably higher—than in the UK.

A kerbside collection system for glass currently exists in Jersey (outside St Helier); a kerbside scheme for collecting paper and metals is currently being tested in St John's. The

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<sup>&</sup>lt;sup>23</sup> Defra (2001), 'Survey of Public Attitudes to Quality of Life and to the Environment'.

<sup>&</sup>lt;sup>24</sup> Source: States of Jersey Environment and Planning Department.

limited material scope, as well as the discounted price currently offered by the contractor (approximately £2.40 per household per year), mean that costs from these scheme are likely to be much lower than a full long-term kerbside collection system.

Taking all factors into account, estimates from the Environment and Planning Department suggest that the collection costs for a full kerbside collection system in Jersey would be approximately £450,000 per annum. In addition to these collection costs, any increase in recycling levels is likely to result in higher costs for processing the recycled materials.

#### 1.1.13 Additional processing costs

Different materials have a range of values as commodities once recycled, depending on their final function. Clothing, once collected, is given to the Salvation Army and taken to the UK; it therefore contributes nothing to the economy once disposed of. Timber from the construction and demolition industry, however, can be reused as kindling or in new-build projects, and is worth approximately £14/tonne. However, the costs of collection and processing the timber are still greater than their sale value, and represent a loss to the economy of £121–£171 per tonne. In addition, the majority of materials exported from Jersey for recycling require subsidies, since the value to the recycler is typically less than the handling and shipping costs. As a result, any increase in recycling levels on Jersey is likely to result in additional processing costs. An estimate of these additional costs is provided in Table 2. 3 suggesting that the processing costs associated with the 32% target would be around £485,000 higher than currently.

Table 2. 3 Waste processing costs consistent with Jersey's stated policy goals

Material	2006 level of recycling (tonnes)	Cost of recycling £/tonne	2008 target (tonnes)	Increased cost of meeting target (£)	2015 target (tonnes)	Increased cost of meeting target (£)
Paper	5,228	36	7,000	62,908	9,000	133,910
Metal	216	110	500	31,240	1,000	86,240
Plastics	463	205	600	28,085	700	48,585
Timber	1,500	138	2,000	69,009	2,300	110,415
Electronics	100	265	300	53,000	500	106,000
Glass <sup>1</sup>	5,487	n/a	6,000	n/a	8,000	n/a
Organics <sup>1</sup>	12,500	n/a	13,800	n/a	15,800	n/a
Total	25,494		30,200	244,242	37,300	485,150

Note: <sup>1</sup> Glass and Organics are processed on-Island and the costs are included within the existing waste budget. Source: Jersey Solid Waste Strategy, estimates from the Environment and Planning Department and Oxera calculations.

The Solid Waste Strategy indicates that some of this additional processing cost can be absorbed within the existing waste budget; however, there would still be a requirement for additional funding in the order of £300,000 per annum.

## Taxes and waste disposal charges

The previous section indicated that additional funding of up to £900,000 per annum would be required in order to meet the recycling objectives set out in the Solid Waste Strategy.<sup>25</sup> The primary mechanism that has been suggested for raising this revenue is the introduction of charges on the disposal of non-recycled waste. It is also hoped that such a charge might

 $<sup>^{25}</sup>$  This is made up of £150,000 to expand the bring bank network; £450,000 to fund kerbside collection; and £300,000 to cover the additional processing costs.

provide additional incentives to either increase recycling rates or reduce the overall level of waste generated. In addition, it has been suggested that taxes on packaging and plastic bags could be used as means to limit the use of these products.

## 1.1.14 Charges for waste disposal

Currently, Jersey does not charge directly for the use of the Bellozanne EfW plant, but it does charge £3.60 per tonne for recyclable waste and £10.00 for non-recyclable waste delivered directly to La Colette (the landfill/land reclamation site). Like all goods and services, there is a relationship that exists between the price of waste disposal and the demand for it. If the price of disposing of waste is increased, there *may* be less waste being sent for disposal (whether to land fill or to the EfW plant). If creators of the waste can reduce the amount they have to pay for disposal by reducing the amount of waste they create, or if they can reduce their own payments by treating their waste differently (for example, by taking out the recyclable material), a financial incentive is created to change their behaviour. The current charges at La Colette provide such an incentive for inert waste; however, at present there is no mechanism for incentivising reductions in the level of non-inert waste being sent to Bellozanne.

For such incentives to work, there needs to be a direct relationship between the level of waste produced by individual Jersey households and business and the waste disposal charges they face. Such a relationship could be created directly, in the form of end-user disposal charges, or indirectly through the parishes.

While potentially difficult to administer, direct waste disposal charges could be applied by requiring all waste to be disposed of in approved bags, with the levies on these bags being used to fund the recycling programme. The likelihood of fly-tipping to avoid such a charge is a significant risk.

An alternative mechanism would be to introduce gate fees for waste disposal at Bellozanne. While in the first instance it would be the parishes that would incur the costs of these gate fees, this would provide an incentive for them to reduce levels of household and commercial waste arisings. One mechanism they could use to achieve this would be to directly pass these costs through to parishioners in the form of direct waste collection charges.

Regardless of the mechanism by which the waste disposal charges are applied, the level of charging needed to fund the £900,000 required by the recycling programme would be approximately £11.8/tonne of total non-inert waste produced. The impact of these charges on the cost of municipal waste disposal would equate to around £15 per household per annum. For the commercial and industrial sector, the total cost of the charges would be around £375,000 per annum.

## 1.1.15 Impact of disposal costs on waste arisings

The reduction in volume of waste being sent to landfill or an EfW plant stemming from a rise in the price of its use (either because charges or a tax is introduced) depends on the market price elasticity of landfill/EfW use and users being explicitly faced with the costs. Studies in the UK (and elsewhere) have shown that landfill use is generally quite inelastic—ie, quantity decreases little compared with an increase in price, since there is often still no cheaper disposal alternative. If the use of landfill/EfW is to be reduced via a tax, the tax rates have to be sufficiently high for recycling to have a comparable cost to users.

For Jersey, where the EfW plant is the equivalent of landfill disposal, this suggests that any charges (including additional taxes) on EfW use will not be effective in significantly decreasing the total waste volumes that need to be disposed of. More realistically, if

 $<sup>^{26}</sup>$  Based on the 44,406 tonnes of waste sent to Bellozanne by the parishes in 2004.

residents are faced with the direct costs of using the EfW, they may be more inclined to divert waste to recycling, where this is possible and where this represents a lower-cost option *for them*.

Even without direct charging of residents, it is still possible that charging parishes for waste disposal at the EfW plant can provide them with a financial incentive to encourage recycling. Currently, the costs of recycling schemes are such that there is a large disincentive to expand them. If these costs were offset by a reduction in disposal costs for the EfW facility, they would become more attractive for parishes.

#### 1.1.16 Introduction of taxes on packaging and plastic bags

A typical family disposes of 3–4kg of food packing in a week, accounting for 15% of household waste overall.<sup>27</sup> Although this makes up a small proportion of the material being sent to Bellozanne (less than 10%), there may be scope to reduce this volume. Levying a packaging tax on supermarkets could incentivise them to reduce the volume of packing on their products.

Plastic bags cause special harmful externalities if not disposed of carefully, being especially visible when discarded in public and harmful to wildlife. Introducing a tax on plastic bags could dramatically reduce the use of them.

However, the benefits of such a tax may not be as great as they first appear. Packaging is a cost to the producer and retailer, and as such it is already economically beneficial for them to reduce to a minimum the gross amount of packing, while securing the benefits that packaging bring to either the retailer (eg, reduction in spoilage), or the consumer (eg, increased ease of transport, reduction in spoilage). Imposing a small tax would therefore be unlikely to significantly reduce the amount of packaging waste produced, since it would be unlikely to shift the optimal trade-off point between packaging costs and benefits to any great extent. In addition, although a packaging tax would generate a stream of revenue for the Treasury, the supermarkets and shops are likely to pass the costs directly to customers. Since food purchasing increases relatively little with income, <sup>28</sup> a food packaging tax represents a regressive tax on households, rather than a tax on business.

Finally, reducing packaging may not be equivalent to reducing waste overall. The packaging industry council argues that packaging keeps food fresh and therefore reduces food waste, and that a decrease in packaging may even lead to an increase in the overall level of household waste.<sup>29</sup>

Although the impact of a tax on packaging may not have a very significant effect on the total amount of packaging waste arising, there may be conditions under which very specific taxes can achieve a particular objective. Although there does not appear to be a definitive analysis of the impact of the Irish plastic shopping bag tax, there does seem to have been a significant reduction in the consumption of plastic carrier/shopping bags, and a reduction in the *litter* associated with their (improper) disposal.<sup>30</sup> Similar impacts may also have occurred in other jurisdictions where supermarkets have agreed not to give away free shopping bags at the checkout (eg, Corsica).

The impact of a highly targeted packaging tax may not, however, be a good indication of the impact of a general packaging tax. In particular, there are very close substitutes for the free plastic carrier/shopping bags that are handed out by retailers, especially strong paper bags,

<sup>&</sup>lt;sup>27</sup> INCPEN website,' What You Need to Know about Packaging and Waste'.

 $<sup>^{28}</sup>$  Jersey Household Expenditure Survey, 2005.

<sup>&</sup>lt;sup>29</sup> INCPEN website, 'Packaging: The Facts'.

 $<sup>^{\</sup>rm 30}$  OECD (2006), 'The Political Economy of Environmentally Related Taxes', June.

multi-use (and much stronger) plastic bags, shopping bags made of cloth, etc. In economics terms the existence of very close substitutes that are not taxed is likely to create a larger price elasticity of demand. Under these circumstances, a relatively small tax can induce significant changes in behaviour, as consumption switches to the untaxed close substitute (and, as a side effect, significantly reduces the revenue-raising potential of the tax).

In addition, targeting the tax at a very specific problem—for example, the litter associated with the improper disposal of shopping/carrier bags—can mean that the tax is successful even if it has a very limited (or even no) impact on the total waste arising. In the UK, all plastic bags make up only 0.3% of the domestic waste stream. This is clearly only a very small amount of waste arising, and therefore the scope for reduction of household waste through a shopping/carrier bag tax is minimal. Furthermore, as indicated above, there may be other non-tax ways to achieve the same objectives—for example, an agreement by supermarkets on the Island not to provide any plastic carrier bags.

## Distributional impacts of waste taxation and charging

If a policy of per-tonne charging for the EfW facility were introduced, the majority of these charges would naturally fall on the parishes. The actual level of this cost would clearly depend on the level of gate fees applied; however, a broad indication of the impact on parishes can be provided based on the average waste processing costs at Bellozanne of around £32 per tonne. With 44,500 tonnes delivered to Bellozanne from parishes in 2004, the increase in total parish costs would be in the order of £1.4m, which would need to be recovered from residents or commerce. (Note that there is a matching reduction in net expenditure of £1.4m by the States.) Households account for around half of the municipal waste arisings; therefore, if these costs were passed through to residents, the average impact of applying these gate fees would be approximately £20 per household per year. Clearly, higher gate fees aimed at reducing waste arisings would result in proportionately higher costs to the parishes (and hence households).

The precise distributional impacts of these increased costs would depend on how the parishes would choose to recover them. If they are recovered through increases in parish rates, the impact will be slightly regressive when measured as a proportion of total household expenditure (although the absolute amount paid by households would increase as household income increased). Parish rates currently represent a declining proportion of total expenditure from around 1% in the lowest household income quintile to around 0.6% in the highest quintile. The present funding mechanism, which is dominated by income tax, is significantly progressive, with lower-income households paying a significantly lower proportion of their income in taxes than higher-income households.

If parishes recharged the costs (charges or taxes) back to households on the basis of the amount of waste generated by each household (e.g. by introducing per-bag charging), the distribution would again be different. More waste is likely to be produced by households with more disposable income. If waste production was proportional to waste-producing expenditure (ie, excluding expenditure on services, transport, housing, etc) the ratio of expenditure between the lowest and highest quintiles is approximately 1:5, and this would be reflected in the charges paid by households. (If charges are based on rates, the ratio is more like 1:3.) However, there does not appear to be any extensive empirical data on the relationship between household income and the production of waste, and a proportionate

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<sup>&</sup>lt;sup>31</sup> This is based on 2004 data from the Solid Waste Strategy, indicating total throughput of around 77,000 tonnes and net running costs of approximately £2.5m.

<sup>&</sup>lt;sup>32</sup> Assuming 35,000 households. Sources: States of Jersey (2005), 'Solid Waste Strategy', May, pp. 24, 25; States of Jersey (2005), 'Jersey in Figures', p. 32; and States of Jersey, 2006 Budget, p. 37.

Jersey Household Expenditure Survey, 2005, expenditure by income quintile, detailed spreadsheet.

relationship may not hold.<sup>34</sup> For example, expenditure on higher-priced items as income rises would not necessarily produce more waste with increasing income.

Charges falling on commercial enterprises are likely to feed through into prices. There is insufficient data available to calculate the relative impact but, in general, activities producing more waste per unit of output would see their prices rise more in absolute terms than other activities. As a first approximation, these increases in the costs of production will hit residents in proportion to their expenditure.

Creating the financial incentives through charges or taxes for those generating waste to either reduce that waste or to take action to reduce particular forms of waste (eg, to sort waste such that it can be more easily recycled) will change the distribution of the recovery of the costs of waste disposal. Given that the current cost recovery is based on a progressive tax structure, it is likely that any new charging structure would be less progressive. In the future, with the introduction of GST, the difference between the charging structures is likely to be (slightly) reduced.

## 1.1.17 Increasing gate fees at La Colette

It is currently anticipated that all available capacity at La Colette will be depleted by 2015<sup>35</sup>. This may present a problem if an alternative site cannot be found in time. It is currently believed that there may be a gap of up to five years before the intended replacement will be available. It would be therefore advantageous to reduce inert arisings and extend the lifetime of the site.

Increasing the £10/tonne gate fee on non-recyclable inert waste could have the effect of reducing the inert waste arisings. However, since most of the inert waste is produced by the construction industry, if the fee is to have an impact it will need to create an economic incentive to:

- increase the incidence of recycling the material on site;
- change the economics of refurbishment versus rebuilding; or
- change the economics of (re-)development to reduce the level of activity in the construction sector.

The construction of new buildings often requires the use of inert material such as aggregates. These aggregates can often be created on-site as part of the demolition process and, even in the absence of a tax, there can be economic benefits from recycling material with the building site. The application of a landfill tax (or increased gate fees) will improve the economics of recycling. However, the precise impact on the economics, and hence the impact on the recycling rate, will depend on site-specific characteristics thus the precise impact of any particular tax level is difficult to predict.

However, one approach would be to set a tax rate that made the current costs of disposal similar to the costs that would apply if La Colette was full and the new facility was unavailable. This shadow price would ensure that recycling that was economic in the future takes place now, which would help to avoid the actual costs to the economy that would be incurred by extending the life of (the lower-cost) La Colette. The tax revenue created

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<sup>&</sup>lt;sup>34</sup> Dresner, S. and Ekins, P. (2004), 'Charging for Domestic Waste: Combining Environment and Equity Considerations', PSI Research Discussion Paper 20, available at: http://www.psi.org.uk/docs/rdp/rdp20-dresner-ekins-waste.pdf

<sup>&</sup>lt;sup>35</sup> Source: States of Jersey Solid Waste Strategy 2005.

<sup>&</sup>lt;sup>36</sup> Such rates could be derived by estimating the future costs of the replacement facility and applying these to waste deliveries at La Collette.

represents a transfer in the economy, while if the costs of the more expensive disposal are actually incurred, this spending is lost to the economy.<sup>37</sup>

As disposal costs are likely to represent a relatively small part of the total costs of construction, actually altering significantly the economics of refurbishment and (re)development is likely to require quite substantial taxes. As, by definition, these taxes would change the built form in Jersey, the knock-on effects on the economy could be significant, and very careful consideration would need to given to the costs of this approach and its impact on other strategic objectives such as developing the Waterfront, compared with the environmental benefits of reduced inert waste disposal.

In purely economic terms, the price at La Colette required to reduce inert waste arisings sufficiently to extend the life of the site for five years depends on the price elasticity of demand. Assuming a relatively simple and inelastic market, modelling indicates that the price may need to increase to at least £22/tonne in order to preserve enough void to prolong the site life by five years.<sup>38</sup> However, for the reasons set out above, the precise economics of on-site recycling should be analysed before any tax rate is set.

#### 1.1.18 Comparison of waste charges in other countries

In the UK, landfill sites are largely privately owned and charge a gate fee to both trade and council waste disposal authority customers. For trade waste, this fee ranged from £7/tonne to £40/tonne in 2003,<sup>39</sup> depending on waste and contract types. Municipal contracts for disposal of household waste are re-tendered after a number of years (depending on council) and bid for competitively by a number of waste disposal operators.

In other countries, the charge for waste works in different ways. The Jersey Solid Waste Strategy document cites the examples of Switzerland and Ireland, where official bags and tags for waste are sold, and only waste disposed of using these is collected.

Many countries in Europe charge for waste disposal via a gate fee regime. Table 2. 4 compares the nature and level of these charges.

<sup>&</sup>lt;sup>37</sup> Ideally, the tax rate would be set just at the level at which the use of La Colette is reduced so that its life is extended just until the new facility can come onstream, or to raise the current price to the cost of the interim solution, whichever is the lowest.

<sup>38</sup> Source: Oxera.

<sup>&</sup>lt;sup>39</sup> Source: Environment Agency.

Table 2. 4 Comparison of EU landfill taxes and charges

Country	Waste levy
Austria	Ranges from €7/tonne to €123/tonne
Czech Republic	Up to €15.68/person/year
Denmark	Municipal: €184.92 average annual household charge. Trade waste €44–€50/tonne
Estonia	€0.12–€12.78/tonne
Finland	€30–€50/tonne
France	Varies regionally
Greece	Not available
Hungary	€12.09–€23.34/tonne.
Italy	€0.21–€25/tonne
Latvia	€5–€8/m³
Lithuania	€3,20–€6,57/m <sub>3</sub>
Malta	€0.77/tonne
Netherlands	€185 average annual household charge
Poland	€2–€30/tonne
Sweden	€31/tonne trade, municipal varies regionally
United Kingdom	€2.92 inert, €26 standard waste

Source: OECD economic instruments database.

Costs of recycling the waste, once collected, vary depending on the level of sorting undertaken at the kerbside, with co-mingled being more expensive to process than fully sorted waste. To reflect this cost disparity, and to encourage parishes to implement kerbside-sorted waste, different fees for these types of waste could be introduced. The differential in this fee would depend on the estimated costs of implementation of the recycling regime.

#### 1.1.19 Would there be a rise in fly-tipping?

The financial incentive to reduce waste production through charging for the amount of waste produced has the unwelcome side effect of also creating a financial incentive to avoid these payments by fly-tipping. No estimates appear to exist yet on the precise relationship between direct disposal charges and levels of fly-tipping, therefore placing a value of the clean-up charges incurred by Jersey would be highly error-prone.

However, in the UK, recent studies have shown that fly-tipping is a significant problem, with an average of 1.8 incidents per thousand population every month. This leads to a cleanup bill for the local authorities of somewhere in the region of £50m annually<sup>40</sup>. This represents a cost of about £1 per person per year, so on a strictly proportionate basis the costs in Jersey would be around £80,000 per year. A majority of this waste tipped illegally was black-bag and other household refuse.

#### Financing recycling and waste disposal

The economics of waste disposal using an EfW facility and recycling on an island such as Jersey raises the possibility that increases in recycling will increase the total costs of waste disposal faced by Jersey residents. The additional costs incurred by the extra recycling will need to be recovered from Jersey residents in one way or another.

 $<sup>^{40}\</sup> http://www.defra.gov.uk/environment/localenv/flytipping/pdf/flycapture-data0506.pdf$ 

As the success of recycling requires the cooperation of householders to sort their waste and possibly to transport the waste to bring banks, it is unlikely that this recycling cost can be recovered from those participating in the recycling system. Indeed, to encourage householders to participate in recycling schemes, the financial incentives should, if possible, flow in the other direction, notwithstanding the fact that the direct economic costs of disposal may be working in the opposite direction. The justification for this is that the environmental (or other) benefits arising from the additional recycling provide benefits to Jersey that outweigh these additional costs.

The main options for the funding of the recycling schemes are from general taxation or from a tax on the disposal of non-recyclable waste. Charges on non-recyclable waste may, or may not, be passed on to residents in a way that allows them to alter their costs through changing their own level of recycling. These charging structures have different distributional impacts, as well as providing different financial motivations for residents to change their behaviour in desired (or undesirable) ways.

Given the existing main tax structures that exist in Jersey, using general taxation to fund recycling schemes is likely to have the most progressive outcome, but creates no financial incentives for residents to increase recycling. If residents are charged directly for the disposal of non-recyclable waste (including any tax to pay for recycling)—for example, by the bag or by weight of waste taken away—and recycling is free, the maximum financial motivation to recycle is created, as is the motivation to fly-tip. Although the total paid to dispose of waste is likely to increase with income in absolute terms, it is also likely to decrease with income as a proportion of that income.

In the intermediate position where parishes are charged by weight or volume for disposal of non-recyclable waste (including the tax), but this is not reflected in the charging structure facing households, no additional financial motivation is provided to the householder to recycle, but there will be a motivation for parishes to encourage recycling. This approach is likely to produce a less progressive outcome than using general taxation, and it is also possible that this outcome is less progressive than linking the charges to volume of waste produced by households.

The administrative costs of the different charging schemes should also be taken into account. The systems for both the parish rates and income tax are already in place. Charging residents by bag or weight would require a new infrastructure, as would, to a more limited extent, gate fees at the EfW plant.

#### **Proposals**

There is a high level of support in Jersey for the recycling of waste, with strong take-up of new facilities as they come on line. The Council of Ministers wishes to enhance this trend by providing more and better facilities to encourage even greater levels of recycling for a greater range of materials.

Increased spending of £900,000 to £1,000,000 is required to drive progress toward the States' committed recycling target and it is proposed to fund this from the Environment Fund i.e. from the revenues generated by environmental taxes.

There are good arguments for linking a variable charge to the amount of waste produced, at either parish or at individual household level as this sends a clear message and an incentive to recycle more. Such environmental taxes for waste are hampered by the unresolved position on the Bellozanne covenant and therefore there is no immediate possibility of development. In the longer term the use of environmental taxes on waste production is likely to be a key feature of achieving more advanced recycling targets

# Questions Q4. Do you agree that more should be done to encourage greater levels of waste

	recycling?			
	4.1	Yes □No		
Q5.		e charge to bevel or at Pari	e introduced in the future would it t sh level?	pe better to levy it at the
	5.1	Parish		
	5.2	Household		
Q6.	What new fa	cilities or serv	vices would help you to recycle mo	re waste?
	6.1	None		
	6.2	More Inforr	nation on how to sort my waste	
	6.3	Being able	to recycle plastics	
	6.4	More recyc	ling stations	
	6.5	Collection of	of sorted waste from your house	
	6.6	Others (ple	ase describe)	

#### 3. Transport

## **Background**

By international standards, Jersey has a high level of car ownership, with 1.42 cars per household. In 2004, the highest concentration of cars in the EU 25 was in Luxembourg with 650 motor cars per 1,000 inhabitants. Between 1995 and 2005, the total number of vehicles registered in Jersey grew, on average, by 2.7% per annum and, since 2000, annualised growth has been around 2%. In comparison, in the EU 15, the number of passenger cars rose by around 2% per annum between 1995 and 2004. In the UK, the key driver of personal travel patterns over the past two decades, resulting in increasing car ownership and use, have been income growth and the declining real cost of car ownership. These factors may also have been important drivers of car ownership and usage in Jersey. The resulting increases in traffic are likely to have produced greater congestion and a deterioration in the local air quality in Jersey during peak traffic times.

#### **Objectives**

The 'Strategic Plan 2006–2011 seeks to develop an integrated transport strategy that shifts behaviour and cultural mindset with regard to car ownership usage. The 'Integrated Travel and Transport Plan for Jersey' identifies the following key objectives to be achieved by 2011:

- a reduction in peak hour traffic—the plan sets as a target a reduction in peak-time traffic of 15% compared with current levels:<sup>47</sup>
- an improvement in local air quality—the plan sets a target of zero in the number of times local air quality standards at monitored sites are not met (this currently occurs around seven times per year).

To achieve these objectives, a number of policy options are investigated in the Transport Plan, which can be broadly separated into spending and taxation measures.<sup>48</sup>

- Spending—spending measures can finance changes that make alternatives to (single occupancy) car use more attractive.<sup>49</sup> Measures include improving the frequency and quality of bus services to induce commuters to switch from cars to buses.
- Tax—taxes aim to alter behaviour by imposing a cost on activities with negative environmental impacts. Examples include increasing the relative cost of travelling by car by increasing the cost of fuel or increasing parking fees.

The objectives outlined in the Transport Plan require car usage to be reduced during *peak hours* (to reduce congestion), rather than to reduce car usage per se. As such, an important requirement of policy is to change the behaviour of car users during peak hours. During peak hours, survey evidence shows that the largest group comprise people travelling to and from

<sup>&</sup>lt;sup>41</sup> Source: Jersey Statistics Unit (2006), 'The Jersey Annual Social Survey 2005: Chapter 4 Travel and Transport'.

<sup>&</sup>lt;sup>42</sup> European Commission Directorate-General for Energy and Transport (2006), 'Energy & Transport in Figures 2005'.

Source: Jersey Statistics Unit (2006), 'Population Changes 2000 Onwards'; Jersey Statistics Unit (2006), 'Statistical Review 2002'; and Oxera calculations.
 Source: Jersey Statistics Unit (2006), 'Jersey Facts and Figures 2005'; Statistics Unit (2002), 'Statistical Review 2002'; and

<sup>&</sup>lt;sup>44</sup> Source: Jersey Statistics Unit (2006), 'Jersey Facts and Figures 2005'; Statistics Unit (2002), 'Statistical Review 2002'; and Oxera calculations.

<sup>&</sup>lt;sup>45</sup> European Commission Directorate-General for Energy and Transport (2006), op. cit.

 $<sup>^{\</sup>rm 46}$  Source: Transport for London (2004), 'The Demand for Public Transport: A Practical Guide'.

 $<sup>^{</sup>m 47}$  The measures proposed are intended to achieve a gross reduction in peak traffic of 20% by 2011.

<sup>&</sup>lt;sup>48</sup> Source: Jersey Statistics Unit (2006), 'Jersey Facts and Figures 2005'.

<sup>&</sup>lt;sup>49</sup> Strictly speaking, spending measures could also make car travel less attractive—for example, by demolishing public car parks, or implementing traffic clamping measures.

work. The Jersey Annual Social Survey shows that, on a weekday, around 50% of all car journeys are made for work purposes. Around 50% of people travelling to work usually do so by car, on their own.<sup>50</sup>

In general, and if successful, policies aimed at reducing (peak-time) congestion through modal switching will have a knock-on effect on emissions and can therefore lead to improvements in local air quality.

#### **Proposed policies**

The Transport Plan sets out a number of spending measures designed to alter car usage patterns, including the following.

- Public transport improvements—proposed measures include increases in the capacity and service quality of buses, and a reduction in emissions from buses.
- Soft measures—policies that encourage more cycling, walking, car sharing, teleworking and reductions in unnecessary car trips.

Under the proposed policies, most of the objectives are to be met through soft measures (approximately 13% of the 15% reduction in peak traffic). Section 3.2 briefly discusses the spending proposals.

The cost of these policies is estimated in the Transport Plan to be £0.8m–£1.2m per year, and it is proposed that this is funded through the environmental taxation measures set out below. The revenue raised from the proposed annual Vehicle Emissions Duty (VED) is also proposed to fund general revenue expenditure of around £4m per annum, to replace the revenue currently raised by the Vehicle Registration Duty (VRD), which is being withdrawn on the introduction of GST.<sup>51</sup> In total, therefore, between £5.7m and £6m in revenue, net of the cost of collection, needs to be raised through environmental taxation relating to transport.

The taxes being discussed are capable of raising substantially more than this and the revenue could be used to finance environmental spending programmes outside the Transport Plan.

At the levels of taxation needed to raise the required revenue, the impact on car usage of the taxes discussed in this section is likely to be limited, particularly during peak hours. As such, while there may be some impact on behaviour arising from the taxation measures, it is likely that most changes in car usage patterns would have to be induced through the spending polices.

Of the tax options available the following options appear to be the most likely:

- An annual Vehicle Emissions Duty (VED);
- An increase in fuel duty;
- An increase in parking charges.

A further measure discussed in the Transport Plan was the possibility of introducing compulsory annual vehicle emission testing for all vehicles. This would provide a means of ensuring that the actual emissions of a vehicle comply with the manufacturer's published emissions levels. Such an approach could provide some benefits, particularly as a way of

<sup>&</sup>lt;sup>50</sup> Jersey Statistics Unit (2006), 'The Jersey Annual Social Survey 2005: Chapter 4 Travel and Transport'; and a survey undertaken for the Transport Plan.

<sup>51</sup> Source: Jersey Statistics Unit (2006), Jersey Facts and Figures 2005', quoting Jersey Customs and Excise.

targeting emissions from older vehicles and compliance with the emissions test could be linked to the annual renewal of the VED.

#### **Spending measures**

#### 1.1.20 Background

The main mechanism by which the spending measures translate into the reduction of peak-time traffic and improved air quality is transport modal switching. Journeys that would otherwise have taken place by car are substituted by journeys by bus, walking or cycling. These alternative modes of personal transport have substantially lower emissions per passenger-km (in the case of buses, as long as there are sufficient passengers). As a result, if the spending measures are successful in achieving a reduction in peak-time traffic, the objective of improving local air quality is also likely to be met as a by-product of the reduced car use.

The improvement in air quality may also be achieved by changing the emission characteristics of the cars in Jersey—e.g., through the VED, which raises the price of high-emission cars, as discussed below.

#### 1.1.21 Public transport

The Transport Plan suggests several measures to increase the capacity and quality of the bus service. Around 2% of the proposed real reduction in peak traffic is to be achieved through increased bus usage. To meet the Plan's objectives, the measures need to be targeted at increasing the capacity and quality (including access to bus stops and frequency of service) of buses during peak periods in order to encourage commuters to switch to the bus service.

The increase in spending on buses, including measures to reduce emissions, is subject to negotiation with the holders of the bus franchise.

The introduction of a priority bus lane (and high vehicle occupancy lane), could make bus use more attractive relative to single-occupancy cars, since it would reduce the bus journey time, particularly during peak times.

Evidence shows that around 36% of frequent car users (those travelling at least once per day) revealed that nothing could encourage them to use their car less. However, 39% stated that an improved bus service would encourage them to use the bus more, so there may be scope for a significant reduction in car usage in Jersey. The objectives of the Transport Plan are not dependent on a significant modal switch from cars to buses.

#### 1.1.22 Soft measures

An important component of the Transport Plan is the reduction in road traffic through soft measures—i.e., initiatives that encourage more cycling, walking, car sharing, tele-working and reductions in unnecessary car trips. As highlighted above the Transport Plan proposes that the majority of the reduction in traffic during peak hours is to be achieved through these measures.

Research by the UK Department for Transport has shown that, nationally, such measures may, over the longer term, reduce traffic levels by 5% in the UK.<sup>53</sup> More recently, studies have suggested reductions of up to 11% may be achieved for the UK overall, and up to 20%

<sup>&</sup>lt;sup>52</sup> Jersey Statistics Unit (2006), 'Jersey Annual Social Survey 2005'.

<sup>&</sup>lt;sup>53</sup> Halcrow Group Ltd (2001,2002), 'Multi-Modal Studies: Soft Factors Likely to Affect Travel Demand', report for Department for the Environment, Transport and the Regions.

during some urban peak periods, under intensive use of these soft measures and a supportive policy context.<sup>54</sup>

The effectiveness of such measures in changing individual travel patterns and in reducing peak traffic depends on the specific package adopted, and is linked to other spending measures such as the availability of safe cycling routes and increases in the supply and quality of bus services.

#### **Taxation measures**

As indicated above, three main taxation measures related to transport (VED, fuel duty and parking charges) are proposed options to pay for the spending programmes that underpin the achievement of the environmental objectives of reducing peak hour traffic and improving air quality. These are analysed in more detail below.

#### 1.1.23 Vehicle Emissions Duty

#### 1.1.24 Environmental impact

An annual VED imposes an annual tax related to vehicle  $CO_2$  emissions, it is not linked to road use and will therefore include some vehicles that are not currently registered because they do not travel on the public highways. Vehicles that produce no  $CO_2$  such as electric powered vehicles would be exempted from the charge.

VED can be considered as increasing the (fixed) running costs of vehicles because once the car is purchased, the VED is a fixed annual cost that has to be paid regardless of other variables such as usage intensity. For example, if the VED for a certain vehicle is £100 per year, and the vehicle is kept for five years, the total amount that will have to be paid for owning the car is a fixed £500 regardless of any change in driving habits. As such, a VED does not provide a marginal incentive to modify driving habits, and, as a result, the VED is therefore likely to have little impact on peak-time congestion, as it does not affect the marginal cost of vehicle use.

If the VED is to have an impact on peak-time vehicle use, this will have to be achieved through the mechanism of increasing the fixed costs of owning a car such that some potential owners of cars do not purchase a car at all or that, for some income groups, following a reduction in disposable income as a result of VED, they keep their expenditure on other goods and services fixed, and reduce their expenditure on car trips to balance their household budgets. However, these two effects are unlikely to produce a significant impact as VED payments for the least polluting cars are likely to represent a very small proportion of the total car-ownership costs, and an even smaller proportion of total expenditure. It is also worth noting that, if the latter effect were significant, it would occur as a result of any tax increase or, indeed, a price rise in any of the other, more essential, expenditure.

However, through setting *differentiated* rates for low- and high-emission vehicles, a VED can be used to incentivise consumers to buy lower-emission cars. If purchasers respond to this incentive, over the longer term, a VED will change the emission characteristics of the vehicle stock in Jersey, thereby improving the local air quality. The likely impact of this mechanism depends on how responsive new car buyers in Jersey are to a change in the price differentials between different cars.<sup>56</sup>

<sup>&</sup>lt;sup>54</sup> Sloman, L., Cairns, S. and Goodwin. P.B. (2004), 'Smarter Choices: Changing the Way We Travel', Department for Transport.

<sup>&</sup>lt;sup>55</sup> The price increase would not be proportional across all the types of vehicles since those that emit more would face a greater purchasing price increase. <sup>56</sup> ...

<sup>&</sup>lt;sup>56</sup> Although the VED would be applied to all cars, its direct impact on the stock of used cars on the Island is likely to be rather small, if not negligible. This outcome arises because if the relative annual running cost of an existing 'dirty' vehicle rises, its

#### **UK** experience

The UK VED, introduced in 2001, is an annual levy on vehicles based on graduated  $CO_2$  emissions bandings. For petrol cars, the UK system distinguishes between seven bandings of  $CO_2$  emissions. Separate bandings exist for diesel cars; however, since more than three-quarters of cars in Jersey are petrol-powered, the focus in this section is on petrol cars. These bandings are shown with the corresponding rates in Table 3. 1.

Table 3. 1 UK VED figures

Band	CO <sub>2</sub> emissions figures (g/km)	VED rate for petrol cars (£/year)
Α	Up to 100	0
В	101–120	40
С	121–150	100
D	151–165	125
E	166–185	150
F	185–225	190
G	Over 225	210

Source: House of Commons Environmental Audit Committee (2006), 'Reducing Carbon Emissions from Transport: Ninth Report of Session 2005–06', July.

While VED may be used as a policy tool to incentivise the purchase of low-emission cars, a recent report by the UK Environmental Audit Committee challenges the effectiveness of the current UK VED banding structure in achieving this.<sup>57</sup> The main conclusion is that the magnitude of the existing tax rates is not sufficiently large to influence buying behaviour, since the present tax rates do not 'hit people in the pocket'.<sup>58</sup> Instead of the current difference between the lowest and highest emission vehicle of around £240 pa, the committee recommends a £300 gap between each band (ie, £0 for the lowest emission band and £1,800 for the highest emission band).

The report recommends that the existing differentials in the VED between different categories of car are widened substantially. Such changes could be introduced at once on a revenue-neutral basis, and would reward consumers for making greener choices as well as encouraging manufacturers to produce greener cars.

Hence the Committee's conclusion is that using a VED tax to significantly alter buyer behaviour would require larger differentials between different bands than are currently applied in the UK. However, introducing such large differentials as proposed by the Environmental Audit Committee raises some distributional issues, since purchasers of vehicles before the introduction of the new levy of VED would not be able to respond immediately to the increased tax burden by purchasing a low-emission car. Such concerns would need to be addressed prior to introducing such a measure.

However, unless the VED is introduced with a relatively large differential between low- and high-emission cars, it is likely to have little impact on emissions in Jersey. The main purpose

value in the second-hand market is likely to fall. Thus the total annual running costs of a 'dirty' car will change less than the VED, so the VED is unlikely to change the mix of cars on the Island except through the impact on the new car market. Exceptions to this outcome could occur if the cost differentials of the VED were such that, as a result of the induced changes in the relative price of second-hand cars, it became economical to import 'clean' second-hand cars from outside Jersey and to export 'dirty' cars to some other jurisdiction (eg, the UK).

<sup>&</sup>lt;sup>57</sup> House of Commons Environmental Audit Committee (2006), 'Reducing Carbon Emissions from Transport', Ninth Report of Session 2005–06, July.

<sup>58</sup> Department for Transport (2004), 'Assessing the Impact of Graduated Vehicle Excise Duty: Qualitative Report', March.

of such a levy can therefore be seen initially as raising revenue hypothecated for other measures that are more effective at achieving environmental objectives.

#### 1.1.25 Revenue-raising potential of a VED

The UK bandings, which do not appear to have had a significant impact on demand, can be used to calculate the potential revenue from a similar VED applied to Jersey, although it is necessary to make a number of assumptions.

- Tax base—the revenue is calculated only on 75% of the registered motorised vehicles in Jersey in 2005 (101,583)<sup>59</sup> to allow for vehicles that are no longer on the road and which would therefore not be liable for VED.
- Composition of Jersey car stock—the composition of the existing Jersey vehicle stock in terms of emissions is not known. Therefore, the VED profile of Jersey's total vehicle stock is assumed to be equal to the UK's VED profile for *new* car sales. Since newer vehicles tend to have lower emissions, this assumption may underestimate the number of cars with higher emissions, and as such tax revenues may be *underestimated*. Given the higher per-capita incomes in Jersey, this approach may also underestimate the number of larger and more expensive cars in the stock, which is again likely to underestimate the number of higher emission vehicles in the stock and therefore the tax yield.

Table 3. 2 shows the revenue from a VED in Jersey using UK VED bandings. The revenue estimates assume that car owners will continue to by similar vehicles to those they own at present. If car owners respond to the (limited) fiscal incentives by purchasing low-emission vehicles, the resulting revenues would be lower, as would the emissions they produce.

Table 3. 2 Revenue of a VED, with UK VED rates, in Jersey

Bands	UK VED rate for petrol car	% of new UK car sales	Number of vehicles	Revenue (£/pa)
Α	0	0	0	0
В	40	3	2,514	100,567
С	100	31	23,466	2,346,567
D	125	25	18,971	2,371,328
Е	150	17	13,104	1,965,631
F & G	200	24	18,133	3,626,513
Total	137	100	76,187	10,410,607

Notes: Figures do not sum due to rounding. New car sales are only available jointly for categories F and G. The joint F & G rate is based on the average of the rates in the two bands. The number of cars in each of the band is obtained by multiplying the % of new UK cars sales by the total number of cars in Jersey (76,187). Source: Rates and bandings: House of Commons Environmental Audit Committee (2006), op. cit. New UK car sales: The Society of Motor Manufacturers and Traders Limited (2006), 'UK New Car Registrations by  $CO_2$  Performance', April.

Total number of cars in Jersey: Jersey Statistics Unit (2006), 'Jersey in Figures, 2005'; Statistics Unit (2002), 'Statistical Review 2002'; and Oxera calculations.

Under the assumptions made, a VED could be expected to raise around £10m from car users. The actual revenue is likely to be higher, since other vehicles would also be covered by the tax. Of these revenues, £4.0m would be used to replace the loss of revenue from abolishing VRD when GST is introduced. The remainder, £7.5m, could be used to finance Transport Plan and other environmental spending measures.

<sup>&</sup>lt;sup>59</sup> Source: Jersey Statistics Unit (2003), 'Jersey in Figures 2002'; and Oxera calculations.

The current ratio of the VRD between vehicles with large engines (i.e., over 3.5 litres) and those with small engines (e.g., 1.2 litres) is significantly greater than would be likely to arise under a VED using current UK rates. The VRD has a ratio of approximately 8:1 (£3,125 and £375 respectively), while band F compared with band C (which is where these car could be expected to lie) only has a ratio of 2:1 (£200 and £100).

If a wider banding were to be adopted by the States—eg, in line with the proposals by the Environmental Audit Committee—in the short run, revenues could be expected to be substantially higher than under a UK VED, since most vehicles would be taxed at a higher rate. As car owners respond by purchasing low-emission vehicles, the tax revenues would be reduced.

Without increasing the UK rates in line with the Environment Audit Committee recommendations the lifetime ownership costs of VRD are likely to be higher than under a VED system. However, if the VED banding suggested by the Environment Audit Committee were adopted, that level of VED would create greater financial incentives to purchase lowemission cars than the current Jersey VRD.

#### 1.1.26 Distributional impact

The broad distributional impact of a VED can be measured by reference to the proportion of incomes or expenditure paid in tax by different income groups. Note, however, that income is an imperfect measure for car consumption choices, and an individual with a high income may choose to buy a low-emission vehicle, while the opposite may be the case for a low-income household. There is an empirical positive relationship between engine size and price, and a relationship (albeit relatively weak) between engine size and CO<sub>2</sub> emission levels. High-income households tend to buy larger, more expensive cars, and given that the VED rate is higher for high-CO<sub>2</sub>-emitting cars, it is possible that these households pay more in emission duties. High-income households may also own more cars.

However, this does not imply that a VED is necessarily progressive, in terms of the proportion of income paid in tax. Even though the high-income group may be paying more in absolute terms, it is not clear whether it will be paying more as a share of its income compared with lower-income groups. Abstracting from the potential corrective effect that the spending of the tax revenues may have, the distributional effects of the introduction in Jersey of a UK-style VED are likely to be regressive rather than progressive.

The distributional impact can be explored by considering two representative households, one from the lowest-income quintile with an average total expenditure of around £14,500 and another one from the top quintile with an expenditure of £77,500.<sup>60</sup> Suppose that a representative household from the bottom quintile owns a VED band B car, and that a typical household from the top quintile has a car belonging to band G.<sup>61</sup> Under a UK-style VED, they would have to pay £40 and £210 per year respectively. The proportions of their annual household expenditure in tax are shown in Table 3.3

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 $<sup>^{60}</sup>$  Source: Jersey Household Expenditure Survey 2004/2005.

<sup>&</sup>lt;sup>61</sup> These consumption decisions would yield the most progressive outcome since the high-income agent is paying the highest tax rate and the low-income agent is paying the lowest rate. Note that band A is not used because the number of cars falling into this category is likely to be insignificant in Jersey.

Table 3. 3 Illustrative impact of a UK VED on household income

Quintile	Type of car (UK VED band)	Tax payable (£ pa)	Total expenditure (£ pa)	% of household expenditure on VED (£ pa)
Bottom	Band C	40	14,500	0.28
Тор	Band G	210	77,500	0.27

Source: Oxera.

In this example, the high-income household is taxed at a very slightly lower proportion of its yearly disposable income than the low-income household. So for these two representative households, the VED would be only mildly regressive. Consider the other extreme: the bottom quintile household owning a car in band G, and the highest-quintile household owning a low-emission band B car. With similar calculations, the proportions of yearly disposable income spent on the tax would be 1.4% and 0.05% respectively.

The above discussion considers the direct distributional impact. However, the distributional impacts of any tax should take into account the redistribution of any *benefits* arising, not just the distribution of costs. For example, the potential regressive effects derived from the application of the VED (distribution of costs) may be corrected to a certain extent by redistributing the tax proceeds in a progressive way, such as by improving bus services, which is likely to benefit those that are less affluent.

#### 1.1.27 Economic impact of VED

The economic impact of a VED at the levels similar to that currently levied in the UK is likely to be relatively limited. Businesses' profit margins may be reduced to the extent that the tax imposes any additional direct costs on them. If the affected businesses are able to raise their prices, this will result in a reduction of disposable personal incomes of their customers (i.e. Jersey residents).

There may be a specific impact on the car-rental business, but a VED is likely to be a small proportion of total costs within that industry and, unlike the VRD, the annual nature of the tax would have less impact on the re-export of ex-hire cars into the second-hand market in the UK. To the extent that, under a higher rate, the number of cars per household would be reduced, a reduction in congestion may result in an economic benefit in terms of journey time saved for both businesses and private individuals.

In general, any economic costs produced by the taxes may be partially offset by the economic or environmental benefits generated by the spending measures that are financed via the tax.

#### **Fuel duty**

#### 1.1.28 Environmental impact

Fuel taxes increase the marginal cost of journeys undertaken. Unlike the VED, fuel duty has a fiscal impact on the choices made by users after they have acquired a particular car. To the extent that higher journey costs reduce the propensity to make that journey, there is potentially a direct relationship between fuel duty and congestion, and a knock-on effect on emissions. They may therefore produce environmental benefits by reducing the number of car trips (e.g., by encouraging switching to other modes of transport or car-sharing) and thus the total amount of fuel used. In addition, differentiated rates of duty for different types of fuel may be used to incentivise switching towards fuel that produces fewer pollutants.

In the longer term, car users may also respond to higher fuel prices by switching to more fuel-efficient cars. Similar to a reduction in car usage, this would lead to a reduction in emissions and thus an improvement in local air quality, but would not necessarily reduce the

number of trips taken. Indeed, as a result of acquiring more fuel-efficient cars, the marginal cost of trips declines and there is therefore an incentive to make more trips.

However, the extent to which fuel taxes reduce fuel consumption has been shown to be relatively low, so that increasing fuel duty slightly is likely to be ineffective at reducing the number of trips in Jersey, particularly during peak times when the demand for car transport from those travelling to work is likely to be fairly fuel-price-insensitive. This is likely to be particularly pertinent to Jersey since the average car/van journey length is very short (3.3 miles) <sup>62</sup> and hence fuel costs make up only a relatively minor part of the total cost of owning a car (ie, running, maintenance and purchase costs). To illustrate the impact, at five miles per litre, the additional cost of the average journey to work of a 10p-per-litre tax would increase by around 7p.

While increases in fuel duty are likely to be fairly ineffective at reducing congestion and emissions (particularly during peak hours when demand for car usage is likely to be highly price-inelastic), they have been shown to be effective at raising revenues.

#### Rate differentiations

A number of countries use rate differentiations for certain fuel types. Most countries have lower tax rates for diesel than petrol. While diesel cars are more energy-efficient than petrol vehicles, thus causing lower CO<sub>2</sub> emissions, current diesel technology also has some environmental disadvantages in that it produces more NOx, particulates and noise. Some countries, including the UK and Jersey, therefore charge the same level of duty on diesel and unleaded petrol. <sup>63</sup>

A common distinction is based on the sulphur content of fuels, particularly that of diesel. For example, in the UK and other countries, the introduction of a lower tax rate for low-sulphur diesel and petrol has resulted in high-sulphur varieties virtually disappearing from the market. As a result of the reduction in demand for cars with engines requiring these types of fuel, there has been a shift in the car manufacturing industry towards vehicles that require (or at least that can use) less-polluting fuels. For example, the reduced availability of cars requiring leaded petrol, together with a shift in environmental awareness, is likely to explain the large reduction in leaded petrol in Jersey, which constituted around 60% of fuel consumption in 1991, to less than 2% in 2005.<sup>64</sup>

Bio fuels such as biogas, bio-diesel and bio-ethanol do produce CO<sub>2</sub> when they are combusted but this can be considered as having a neutral impact on global warming because it has been derived from growing plants which captured that same CO<sub>2</sub> from the atmosphere. Consideration will be give to exempting such fuels from increased fuel duty.

#### 1.1.29 Revenue-raising potential of fuel duty

The current duty on diesel and unleaded petrol, which makes up around 90% of motor fuel sold in Jersey, is £0.38 per litre. <sup>65</sup> During 2005, the revenues from road fuel duties in Jersey were £18.5m, showing the high revenue potential of fuel duties. <sup>66</sup>

Table 3. 4 shows the potential revenues from increasing the Jersey fuel tax (£0.38 per litre as per 2006) by different amounts under the assumption of road fuel consumption as per

 $<sup>^{62}</sup>$  Source: Jersey Statistics Unit (2006), Jersey Social Survey 2005', Table 4.2.

 $<sup>^{63}</sup>$  See OECD (2006), 'The Political Economy of Environmentally Related Taxes'.

<sup>&</sup>lt;sup>64</sup> Source: Jersey Statistics Unit (2006), 'Energy Trends 2005'.

<sup>65</sup> The duty on super unleaded petrol is marginally higher at £0.40/litre and £0.41/litre for high-sulphur and/or leaded petrol and diesel.

<sup>&</sup>lt;sup>66</sup> Jersey Statistics Unit (2006), 'Jersey in Figures 2005'.

2005 (around 50m litres). 67 The table shows the net yield from the increase in duty under the assumption that consumers do not reduce their consumption of fuel as a result of the rate rise. The table also provides revenues adjusted for a reduction in consumption following consumers' response to the rate rise. The relevant parameters are taken from an international survey on fuel price demand elasticities. They may be taken only as indicative responses, which may not accurately reflect the actual likely demand response in Jersey (as stated above, the response may be relatively low since petrol costs form a relatively small component of running costs).

Table 3.4 Revenue from an increase in fuel tax (£m)

Scenario	No behavioural response	Short-run response: low potential response rate	Long-run response: high potential response rate
2006 rate + £0.10/litre	5	4	3
2006 rate + £0.15/litre	8	6	5
2006 rate + £0.20/litre	10	8	6
2006 rate + £0.25/litre	13	10	7
2006 rate + £0.40/litre	20	16	9

Source: Oxera.

#### International fuel duty rates

The tax rates on motor fuels vary considerably between countries. The UK has one of the highest rates among OECD member countries (£0.56 per litre of leaded petrol, £0.47 per litre of unleaded petrol, and £0.47 per litre of diesel<sup>68</sup>). In monetary terms, the Jersey petrol duty rate (£0.38) is somewhat above the average rate of OECD member countries. 69 However, when adjusted for differences in purchasing power, Jersey rates are likely to be at the average or below the average of OECD countries. As highlighted above, most countries have lower rates for diesel than petrol and Jersey rates for diesel are therefore above average.

#### 1.1.30 **Distributional impact**

The overall distributional effects of a fuel tax are regressive, as fuel consumption is not closely correlated to levels of income. Therefore, as fuel is taxed, the proportional effect on income reduction is greater for lower-income groups.

Household expenditure for 2004/05 shows that spending on petrol, diesel and other motor oils as a proportion of income is highest for households in the bottom income quintile and lowest in the top quintile (2.2%, 2.1%, 2%, 2%, 1.7% in quintiles 1 to 5 respectively). A fuel duty would approximately raise these percentages proportionately and is therefore mildly regressive. Table 3. 5 shows the distributional impact of an increase in fuel duty of approximately 10p and 40p. The impact of these increases on total average expenditure in household income quintiles is assumed to be equal to a 10% and 40% increase in household spending on the petrol, diesel and other motor oils category in each quintile. Hence households are not assumed to change their overall consumption patterns as a result of the increase.

However, the distribution of the tax burden among households is likely to vary substantially within each quintile. Households without a car are not directly affected by the tax, but may pay indirectly if the fuel duty feeds through to higher prices on other consumption

<sup>68</sup> Source: HM Revenue & Customs.

 $<sup>^{69}</sup>$  Source OECD (2006), 'The Political Economy of Environmentally Related Taxes'.

expenditure and the price of the transport that they do use—for example, buses and taxis. The impact will also vary according to the fuel efficiency of the car(s) owned in each household and the total distance travelled by car.

Table 3. 5 Direct distributional impact of fuel duty

	Quintile					
	1	2	3	4	5	All households
Household expenditure on petrol, diesel & other motor oils (£ pa)	312	416	624	900	1,326	697
% increase in household expenditure; 10% increase in fuel duty (10p)	0.22	0.21	0.20	0.20	0.17	0.19
% increase in household expenditure, 40% increase in fuel duty (40p)	0.87	0.84	0.82	0.81	0.69	0.77

Source: Jersey Household Expenditure Survey 2004/05; and Oxera calculations.

#### 1.1.31 Economic impact of increases in fuel duty

The economic impact of moderate increases in fuel duty is likely to be relatively limited. The additional cost of fuel may put some pressure on businesses' profit margins, particularly for businesses for which expenditure on fuel is an important component of overall costs. If the affected businesses are able to raise their prices, this will result in a reduction of disposable personal incomes for their customers (i.e. Jersey residents).

In general, any economic costs resulting from taxes may be partially offset by the economic or environmental benefits generated by the spending measures that are financed via the tax.

## Parking management

#### 1.1.32 Environmental impact

The use of parking management policies can contribute significantly to managing traffic growth in urban areas. Policies include the control of the supply of spaces, restricting duration, and the use of parking permits and parking charges. Parking is discussed in detail in the Transport Plan.

If parking is to be used as a policy to alter car usage patterns, given the objectives of the Transport Plan, changes affecting the availability and the price of parking would need to be targeted at those car users contributing to congestion during peak hours. An important element of the traffic during peak hours is car users on their way to work and, as such, measures could be targeted at this group. For instance with computerised ticketing it would be possible to vary the rate of charge depending on time of arrival as a financial incentive to motorists to travel outside of peak periods.

The effectiveness of parking policies depends upon the mix of parking that is publicly controlled. In the town area of St Helier, of a total of 12,250 parking spaces, 5,250 are public and 7,000 are private (non-residential). While some commuters are likely to use public parking, the ability to alter commuter behaviour through increases in public parking charges is therefore likely to be constrained by the lack of direct control over the private parking stock.

However, although the provision of private parking may appear to be free to the parker, under most conditions the provision of private parking spaces is already a cost to businesses. Where businesses are not required to provide parking for their employees, the choice to provide parking is associated with an occupancy cost to that provision payable by the business (at least in the medium term where the car parking space could be put to an

alternative use). A relatively small tax on private parking is, therefore unlikely to change the total costs of that parking provision significantly, so is unlikely to make a significant difference to the provision of such parking spaces.

Even if the users of the private parking space are made to pay the tax directly, there is likely to be no, or only minimal, impact. If it was possible to persuade users to not use their cars by inducing a small rise in the costs of doing so, firms that do not provide parking for their employees would need to pay their employees very slightly more, but could then avoid the costs of provision of private parking. Private parking would, under these circumstances, be uneconomic to provide. Since this does not appear to be the case in Jersey, it is unlikely that a small tax on private car parking would result in a significant reduction in its use or provision.

There may be a case on equity grounds for applying any tax on car parking to both private and public parking. However, in the case of private parking, in the long term it is unlikely to make much difference to the demand for parking whether the liability for the tax is placed on the actual user of the parking space (e.g., employee) or the provider of the parking space (e.g., employer). In the short term the impact may be different—if the tax is applied to the providers (i.e., employer) of private parking, its decision to reduce its tax liability is likely to be possible only infrequently—i.e., when acquiring commercial space or redeveloping an existing building. However, if applied to users, they can reduce their tax liability even in the short run, by changing their mode of transport to work.

Current public car park charges are set at 52 per unit, which represents either one or two hours of parking depending on the car park. Unless these are increased substantially (ie, more than the 10% increase proposed in the Transport Plan), this is unlikely to result in a significant change in car usage, as it is likely to have minimal impact on the total costs of the commuter journey. As charges are levied for a maximum of nine hours per day, the 10% price increase represents an increase of 47p (at one unit per hour) or 26p (at one unit per two hours) per day.

#### 1.1.33 Revenue-raising potential of parking charges

The Transport Plan estimates that that a 10% (5p) increase in public parking charges would raise £360,000 per annum. It is unlikely that car users would alter their behaviour as a result of this increase. Given 7,000 private parking spaces, a tax of £2.00 per week per space would raise around £730,000.

#### 1.1.34 Distributional impact

Household expenditure for 2004/05 shows that spending on parking is lowest for households in the bottom income quintile and highest in the top quintile (0.22%, 0.24%, 0.32%, 0.33% and 0.37% in quintiles 1 to 5 respectively). An increase in parking charges is therefore progressive, reflecting different car usage patterns of high- and low-income households. Table 3. 6 shows the distributional impact of hypothetical increases in parking charges by 5p and 50p. The impact of these increases on household expenditure in household-income quintiles is assumed to be equal to a 10% and 100% increase (5p and 50p per unit respectively) in expenditure on parking (all parking is assumed to be charged at the public parking charge of 50p per unit plus the corresponding increase). Households are assumed to not change their overall consumption patterns as a result of the increase.

Table 3. 6 Direct distributional impact of increased parking charges

	Quintile 1	Quintile 2	Quintile 3	Quintile 4	Quintile 5	All households
Household expenditure on parking (£ pa)	31	47	99	146	286	120
% increase in household expenditure: 10% increase in parking charge (5p)	0.02	0.02	0.03	0.03	0.04	0.03
% increase in household expenditure: 100% increase in parking charge (50p)	0.22	0.24	0.32	0.33	0.37	0.33

Source: Jersey Household Expenditure Survey 2004/05; and Oxera calculations.

However, this general pattern of the distribution of the increase in parking charges among households is likely to vary substantially within each quintile and is related to the number of cars in each household and length of stay in paid-for parking spaces. Those without cars, or those who do not use charged (public) parking, will not be affected by the increase. For a household in the lowest quintile, parking five days per week in the most expensive car parks, the maximum increase in parking charges at £2.25 per week would represent less than 1% of total expenditure.

#### 1.1.35 Economic impact of parking charges

The economic impact of modest increases in parking charges such as those proposed in the Transport Plan is likely to be insignificant. For larger increases, the number of trips undertaken may be reduced, and the resulting reduction in congestion could lead to an economic benefit in terms of the time saved during journeys for both businesses and private individuals. If increases in parking charges are sufficiently large to induce shoppers without access to private parking (i.e., where no private parking is supplied) to look for alternative shopping areas—to the extent that these are available—businesses in affected areas may experience a reduction in turnover.<sup>70</sup>

#### **Proposals**

The Minister for Transport and Technical Services has recently set out his proposals for Transport in the Integrated Travel and Transport plan for Jersey (see <a href="www.gov.je">www.gov.je</a>). The top-level aims of this plan are to bring about reductions in congestion, pollution and road injuries primarily by encouraging a gradual reduction in the relative share of trips made by private car. The more efficient use of motor vehicle use will also contribute significantly to our greenhouse gas emission reduction targets.

A comprehensive programme of change is described in the plan with a funding requirement of £0.8 M growing to £1.2 M per annum. It is proposed that this programme is funded from the Environment Fund i.e. from environmental taxes. Funding options from environmental taxes are increased duty on fuel, an annual vehicle emissions duty and parking charges.

Parking charges have a great deal to offer as they are capable of directly affecting choices about bringing a private vehicle to town, and so tackle both congestion and poor air quality head on. However to do this without improving the public transport network capacity would be to provide no viable alternative and so this is a measure for later years. This measure should also be advised by the St Helier Development and Regeneration Strategy when its recommendations are known.

<sup>&</sup>lt;sup>70</sup> Assuming that alternative modes of transport are not good substitutes for car transport, either because the cost is similar or it is less convenient for shoppers.

The choice between an annual Vehicle Emissions Duty and increased duty on fuel is finely balanced. To raise the equivalent revenue to a VED based on UK rates would require an increase in fuel duty of about 20 pence per litre. The cost of motoring in Jersey is significantly less than other countries in Europe, even with VRD included, typically less than half the equivalent cost on either the UK or France.

On balance the Council of Ministers' preferred option is an annual VED as being the mechanism most likely to raise the profile of the need to reduce vehicle emissions. The pros and cons for each are set out in Table 3. 7

Table 3. 7 Pros and Cons of VED and Increased Fuel Duty

	Pros	Cons
Vehicle Emissions duty	Clear message about vehicle choice re-enforced annually  Bands can be set to target worst performers  VRD to be replaced anyway  Captures the total vehicle stock  Can give relief for "double taxation"	Additional cost associated with collection (but VRD collection costs are lost)  Less directly related to the use of the vehicle
Increased Fuel duty	Proportional to amount of use  Collection mechanism exists  Encourages use of fuel efficient cars	No distinction between general duty and the environmental tax "Double taxation" can't be negated

The question of so called "double taxation" arises because it can be argued that those vehicle owners who purchased a vehicle since 2003 have paid Vehicle Registration Duty and would now be required to pay for its replacement as well.

If the replacement for VRD was to be an increased duty on fuel then it would be impossible to treat vehicle owners differently, irrespective of whether they had paid VRD or not. However with a VED system it would be possible to offer tax relief to take account of the previous VRD payment.

Assuming an average ownership of 5 years, and discounting the value of having paid VRD by a fifth for each year of ownership it would be possible to consider a type of relief from VED that reduces liability by up to 80% in 2008 as demonstrated in Table 3. 8

Table 3. 8 Impact of Tax relief for post 2003 registrations on total tax take

	Registered	Registered	Registered	Registered	Registered	Net impact
Tax year	in 2007	in 2006	in 2005	in 2004	in 2003	on tax take
	relief	relief	relief	relief	relief	take
2008	80%	60%	40%	20%	0	-24%
2009	60%	40%	20%	0	0	-14%
2010	40%	20%	0	0	0	-7%
2011	20%	0	0	0	0	-2.5%
2012	0	0	0	0	0	0

NB Assumes a total stock of 100,000 vehicles and 12,000 registrations per year with an average retention time of 5 years.

The increasing tax take over the period 2008-2011 mirrors the required income profile of the Transport Plan funding.

One further matter to resolve with VED is the degree of difference between bands in the scheme. The rates used in the UK are shown in Table 3.2. A review of these rates by the House of Commons Environmental Audit Committee recommended that incremental change between bands should be increased so as to create a more severe differential between top and bottom.

The current VRD has a ratio of approximately 8:1 (£3,125 and £375 respectively), while S d

a ratio propos lower e to ado	of 2:1 (£200 sed VED syst emissions to pt this positio	with band C (which is and £100). There is em, adjusting rates maintain the same of n over a period of years asing the differential	s a good c upwards fo verall tax ears, starti	ase for n or greate income. ing out w	naintaining the remissions The Council ith somethin	his 8:1 ratio in t and downward of Ministers is ag closer to UK	he s for minded
Ques	tions						
Q7.		want to tackle conge I the states adopt? F			,		rity
	7.1 7.2 7.3	Air Pollution Congestion Road injuries	Low  □  □	Med  □  □	High		
Q8.	vehicles and which will go the Transpo	of Ministers wishes d intends to do this b o replacing income lort rt plan. Do you thin fuel duty is the best	y introduc ost by scra k that an a	sing an ei apping V annual Ve	nvironmenta RD and supp ehicle Emiss	I tax, the proce porting measur	eds of es in
	8.1 8.2	Vehicle emission Increase in fuel d	•				
Q9.		ntroduced should the ne same vehicle? Ye	ere be any es <b>□</b> No	y allowan □	ice made for	the previous p	ayment

Q10	If you answere table 3 are real	ed yes to Question 9 do you agree that the rates of relief proposed in asonable?
	10.1	Yes □ No □
Q11.		ED is introduced as a replacement for VRD what should the ratio be highest and lowest bands?
	11.1 11.2 11.3	A ratio similar to the UK scheme of 2:1  A ration similar to Jersey VRD of 8:1  A higher ratio  please specify
Q.12	•	cheme with a high differential between upper and lower bands was best option, how quickly should it be introduced?
	12.1 12.2	Immediately from 2008 ☐ Gradually over a period of 2-3 years ☐

#### **CONCLUSIONS**

There are clear arguments set out throughout this document in support of the introduction of one or more environmental taxes to make progress on the delivery of the agreed environmental objectives within the Strategic Plan. In particular such taxes are critical to the achievement of the Transport plan, waste recycling and energy policy.

At a time when there are significant reforms happening in Jersey's tax system there is a danger of causing confusion by bringing forward a whole new suite of environmental taxes at the same time. At this stage it is important to establish the principal of environmental taxation and an Environmental Fund and to take it forward with perhaps one straightforward measure.

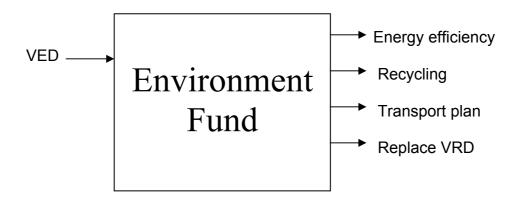
Fewer environmental taxes will also reduce the dead-weight costs associated with setting up several new tax collection systems which in themselves consume some of the revenue stream.

Proposals for energy and waste taxes need to be worked up in greater detail and there are practical obstacles to overcome first such as the Bellozanne covenant. These taxes would be better deferred to a future date when obstacles have been overcome and when expenditure programmes have had the opportunity to bring about real change in our behaviours with respect to energy use and waste creation.

Given that a replacement has to be found for Vehicle Registration Duty, which will be repealed when GST comes into force in 2008 the obvious choice for a single environmental tax would be either a Vehicle Emissions Duty or a further tax on road fuel. As discussed in the previous section the Council of Ministers' preference is for an annual banded vehicle emissions duty

Priorities for environmental tax expenditure in 2008 will be

- An energy efficiency programme
- Enhanced waste recycling
- Implementing the transport plan measures
- Replacing revenues lost by the repeal of VRD



2008 Environmental tax and expenditure proposals

## **Summary of questions**

Q1.	covering information and grants is desirable?						
	1.1 1.2	Information Grants					
Q2.	Should such measures be targeted at low-income households initially?						
	2.1	Yes □No □	1				
Q3.	What measures deserve to be supported by grants?						
	3.1 3.2 3.3 3.4 3.5 3.6 3.7	None Home insulati Energy efficie Photovoltaics Solar heating Micro wind ge Others (pleas	nt boilers eneration				
Q4.	Do you agree recycling?	Do you agree that more should be done to encourage greater levels of waste recycling?					
	4.1	Yes □No □	1				
Q5.	Were a waste charge to be introduced in the future would it be better to levy it at the Household level or at Parish level?						
	5.1 5.2	Parish Household					
Q6.	What new fa 6.1 6.2 6.3 6.4 6.5 6.6	Accilities or services would help you to recycle more waste?  None  More Information on how to sort my waste  Being able to recycle plastics  More recycling stations  Collection of sorted waste from your house  Others (please describe)					
Q7.	The States want to tackle congestion, air pollution and road injuries, what priority order should the states adopt? Please score – low, medium or high						
	7.1 7.2 7.3	Air Pollution Congestion Road injuries	Low	Med	High		

Q8.	vehicles and intends to do this by introducing an environmental tax, the proceeds of which will go replacing income lost by scrapping VRD and supporting measures in the Transport plan. Do you think that an annual Vehicle Emissions Duty or an increase in fuel duty is the best way of achieving this?					
	8.1 8.2	Vehicle emissions duty Increase in fuel duty  □				
Q9.	If a VED is introduced should there be any allowance made for the previous payment of VRD on the same vehicle?					
	9.1	Yes □No □				
Q10	0 If you answered yes to Question 9 do you agree that the rates of relief propose table 3 are reasonable?					
	10.1	Yes □No □				
Q11.	If a banded VED is introduced as a replacement for VRD what should the ratio be between the highest and lowest bands?					
	11.1 11.2 11.3	A ration similar to Jersey VRD of 8:1				
Q.12	•	scheme with a high differential between upper and lower bands was best option, how quickly should it be introduced?				
	12.1 12.2	Immediately from 2008 ☐ Gradually over a period of 2-3 years ☐				
In respo	nding to feedback	o make the following additional comments on this consultation.  k received we may wish to quote comments we receive. Please check here if you do not ributed to you in public				
We wo		ed to receive your views on the questions posed above or indeed on				

We would be delighted to receive your views on the questions posed above or indeed on any other aspect of this consultation document. The consultation period will close on 4<sup>th</sup> May 2007.

Please send your comments together with your contact details to the following address

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