

# Carbon Neutral Roadmap

## Consultation Report





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# 1. Introduction

## 1.1 Background

Consultation on the draft Carbon Neutral Roadmap ran for 6 weeks from 17 December 2021. This report looks at the responses given during the consultation. It includes how the consultation used the people-powered approach set out in the Carbon Neutral Strategy<sup>1</sup>. The report considers responses for each of the strategic policies, as well as the Roadmap itself. The findings of this report will be used to inform the revised Carbon Neutral Roadmap which will be debated by the States Assembly in April 2022.

## 1.2 The people-powered approach

The Carbon Neutral Strategy described using a people-powered approach to developing and delivering a long-term climate action plan. It recognised that the response to the climate emergency will last several decades and will require change in almost every aspect of how we live. It also recognises that the commitment of our community to that change might be contested, and progress will not be at a steady speed. The draft Carbon Neutral Roadmap<sup>2</sup> built on this saying that whole-Island ownership of the Roadmap is critical to its success.

The climate emergency is a global challenge, but action at a global level alone will not be enough. The daily choices we each make – as families; in our businesses and organisations; and together as members of local communities – drive the political and economic forces that global actors respond to.

The draft Roadmap was based on the lots of ideas gathered from Islanders, along with detailed technical studies and the recommendations of the Citizens' Assembly on Climate Change<sup>3</sup>, which randomly selected 45 people in Jersey came together to discuss these issues. In addition to the view of Islanders evidence-based documents<sup>4</sup> were used to inform the draft Carbon Neutral Roadmap. At the same time, the Roadmap recognises the need for Government and the States Assembly to show leadership in updating Island policy to ensure that more sustainable behaviours are required, and that the responsibility to decarbonise is shared equally and fairly.

Islanders' views are at the heart of this Roadmap, and will remain so, ensuring that future delivery plans respond to the will and experience of people in Jersey. The consultation on the draft Carbon Neutral Roadmap was an opportunity for Islanders to express their thoughts on the long-term climate action plan before being debated by the States Assembly.

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<sup>1</sup> [Carbon Neutral Strategy \(gov.je\)](https://www.gov.je/carbon-neutral-strategy)

<sup>2</sup> [Draft Carbon Neutral Roadmap \(gov.je\)](https://www.gov.je/draft-carbon-neutral-roadmap)

<sup>3</sup> [Achieving Carbon Neutrality: Report of Jersey's Citizens' Assembly on Climate Change \(gov.je\)](https://www.gov.je/achieving-carbon-neutrality-report-of-jersey-citizens-assembly-on-climate-change)

<sup>4</sup> [Evidence for the Carbon Neutral Roadmap \(gov.je\)](https://www.gov.je/evidence-for-the-carbon-neutral-roadmap)



## 2. Delivery of the consultation

The Government of Jersey published the draft Carbon Neutral Roadmap<sup>5</sup> that was open for consultation from 17 December 2021 to the 31 January 2022. A small number of submissions (emails) were received after this date, all of which have been considered. The people-powered process made sure that Islanders were able to share their thoughts and views through the development of the draft Carbon Neutral Roadmap. It was important that the people-powered ethos continued through the consultation, making sure that Islanders were given the opportunity to actively have their say on the Roadmap.

The draft Carbon Neutral Roadmap was published on gov.je<sup>6</sup>. To make sure that the draft Carbon Neutral Roadmap was accessible the following were also published:

- summary report in English<sup>7</sup>
- summary report in Portuguese<sup>8</sup>
- summary report in Polish<sup>9</sup>
- summary report in Romanian<sup>10</sup>
- summary animation<sup>11</sup>
- recorded briefing on the draft Carbon Neutral Roadmap<sup>12</sup>.

Printed copies of the survey (in English, Portuguese, Polish and Romanian) were available at several public places including Parish Halls and Jersey Library.

Before the draft Carbon Neutral Roadmap was published, more than 15 stakeholder pre-briefings took place. These included face-to-face and online briefing sessions with a range of key stakeholders.

During the consultation more than 25 engagement events took place. These were designed to give Islanders and stakeholders the opportunity to share their thoughts and views on the draft Carbon Neutral Roadmap. These sessions were not briefings, so the draft Carbon Neutral Roadmap and links to the consultation – including the recorded briefing – were sent in advance. The engagement events included some public sessions in places such as the Central Market so that we could speak to Islanders who might otherwise not have taken part.

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<sup>5</sup> [Draft Carbon Neutral Roadmap \(gov.je\)](#)

<sup>6</sup> [Carbon Neutral Roadmap consultation](#)

<sup>7</sup> [The Carbon Neutral Roadmap: A Summary \(English\) \(gov.je\)](#)

<sup>8</sup> [The Carbon Neutral Roadmap: A Summary \(Portuguese\) \(gov.je\)](#)

<sup>9</sup> [The Carbon Neutral Roadmap: A Summary \(Polish\) \(gov.je\)](#)

<sup>10</sup> [The Carbon Neutral Roadmap: A Summary \(Romanian\) \(gov.je\)](#)

<sup>11</sup> [Jersey's draft Carbon Neutral roadmap to net-zero by 2050](#)

<sup>12</sup> [Steve Skelton - draft Carbon Neutral Roadmap](#)



Engagement event	Stakeholder	Additional information
Pop-up session	Central Market - public	in person
Pop-up session	Romerils Trade centre - trades session (with plumbers / electricians etc)	in person
Pop-up session	Salvation Army café - public	in person
Pop-up session	King Street - public	in person
Stakeholder consultation session	Chartered Institute of Public Relations	online
Stakeholder consultation session	public	online
Stakeholder consultation session	public	online
Stakeholder consultation session	Highlands College senior leadership team	online
Stakeholder consultation session	Jersey Construction Council	online
Stakeholder consultation session	Chamber of Commerce	online
Stakeholder consultation session	Finance sector	online
Stakeholder consultation session	Jersey Business hospitality sector	online
Stakeholder consultation session	Association of Jersey Architects	online
Stakeholder consultation session	Channel Islands Insurance Institute	online
Stakeholder consultation session	Jersey Motor Trades Federation	online
Stakeholder consultation session	eco active business members	online
Stakeholder consultation session	Jersey Business retail sector	online
Stakeholder consultation session	Societe Jersiaise Environment Section	in person
Stakeholder consultation session	Jersey Electricity staff	online
Stakeholder consultation session	Trust company	hybrid
Stakeholder consultation session	Trust company	online
Stakeholder consultation session	Autism Jersey members	in person
Teams meeting	Jersey Estate Agents Association	online
Youth engagement	Jersey College for Girls	in person
Youth engagement	Highlands College students (group 1)	in person
Youth engagement	Highlands College students (group 2)	in person
Youth engagement	Highlands College students (group 3)	in person
Youth engagement	Le Rocquier School students	in person

## 2.1 Activity to promote participation in the consultation

Making Islanders aware of the consultation was extremely important. The following were used to draw attention to the consultation and to encourage people to have their say:

- Social media posts ([Appendix 1](#))
- Instagram stories ([Appendix 2](#))
- Information on the Government of Jersey website<sup>13</sup>

<sup>13</sup> [Carbon Neutral Roadmap consultation \(gov.je\)](https://www.gov.je/CarbonNeutralRoadmap/consultation)





- Video with the Minister for the Environment<sup>14</sup>
- Half page advertisements in the Jersey Evening Post ([Appendix 3](#))
- Advertisements on Radio 103 ([Appendix 4](#))
- Bailiwick Express advertisements ([Appendix 5](#))
- Google advertisements ([Appendix 6](#))
- Emailers
- Carpark banners ([Appendix 7](#))
- Posters ([Appendix 8](#))
- Window decal<sup>15</sup> ([Appendix 9](#))
- Advertisement banner on Government of Jersey website ([Appendix 10](#)).

## 2.2 The impact of COVID-19 on the consultation

Changes to the coronavirus (COVID-19) Winter Strategy were announced 30 November 2021 in response to the COVID-19 Omicron Variant. As a result of the changes, plans for the consultation had to be changed to a mainly online process.

The update strategy meant that from 4 January:

- working from home was recommended for businesses wherever a business deemed it to be possible. When work in offices or other workplaces was necessary, physical distancing and good ventilation were to be used wherever practicable
- masks were made mandatory for anyone over the age of 12 (unless exempt), in a number of indoor public setting. This applied to secondary school pupils and staff, including those in higher education, and staff in primary schools, who must have worn masks in classrooms and when moving around communal areas of the school or college building.
- Each educational setting each setting was asked to plan how they would reduce the risk of spreading the virus. For many that included preventing external visitors and not mixing year groups.

It was recognised that some groups of people would not be able to take part in a fully online consultation. Plans were put in place to make sure that Islanders knew about the consultation and were able to take part in different ways. This included a small number of face-to-face sessions where necessary. Public Health guidance was followed fully for these sessions.

<sup>14</sup> [Carbon Neutral Roadmap -Deputy John Young](#)

<sup>15</sup> Window decal refers to a shop window display in Romeril's main retail outlet in St Helier



## 3. Methodology

### 3.1 The Engagement Pyramid

The Engagement Pyramid<sup>16</sup> is a tool that helps us to understand how people engage at different levels. Low level, lightweight engagement sits at the bottom of the pyramid and high intensity, deep engagement at the top. More people tend to engage when the level of commitment required is lower, so most people sit in the lower half of the pyramid. Getting people involved in the higher levels often needs some sort of personal relationship as there is no substitute for the 'human touch'. But the human touch is very resource heavy, and our consultation took place during a 'wave' in a global pandemic. To gain a wide range of views on the draft Carbon Neutral Roadmap it was recognised that we needed a mix of engagement tools, across the levels, to make sure we had varying levels of interest and engagement.



Figure 1: The Engagement Pyramid.

1. **Observing:** "I care enough about the issue to be aware of your organization's existence, but you haven't given me reason or opportunity to investigate you first-hand" (bottom of the engagement pyramid)
2. **Following:** "I care enough about your work to open my stream of incoming communications to you, but there's no guarantee I'll look at what you send me"

<sup>16</sup> [The Engagement Pyramid](#)



3. **Endorsing:** "I endorse the work you do, but it is your work and I'm not prepared to invest a significant amount of my time/money in it"
4. **Contributing:** "I'm committed to the work and will pitch in to help, but don't expect me to assume responsibility"
5. **Owning:** "You can count on me to figure out what needs doing and to be responsible for getting the job done in the way that makes the most sense"
6. **Leading:** "I'm willing to lead us in carrying out this mission."

### 3.2 The Engagement Pyramid and the draft Carbon Neutral Roadmap consultation

The Consultation was designed with the Engagement Pyramid in mind. It was important to give Islanders the opportunity to get involved at each level.

1. **Observing:** Media coverage; adverts in the Jersey Evening Post / Bailiwick Express / Channel 103 / google ads / window decal
2. **Following:** Emails were sent to networks such as the eco active business network, Government of Jersey mailing list, Wild About Jersey mailing list and to stakeholders; social media posts (Jersey's Climate Conversation and Government of Jersey channels)
3. **Endorsing:** Responding to social media posts and reading direct communications
4. **Contributing:** Responding to the survey; participating in Stakeholder consultation sessions; participating in focus groups
5. **Owning:** Written submissions; organising consultation sessions
6. **Leading:** Helping to facilitate stakeholder consultation sessions; high-level input into policy development.

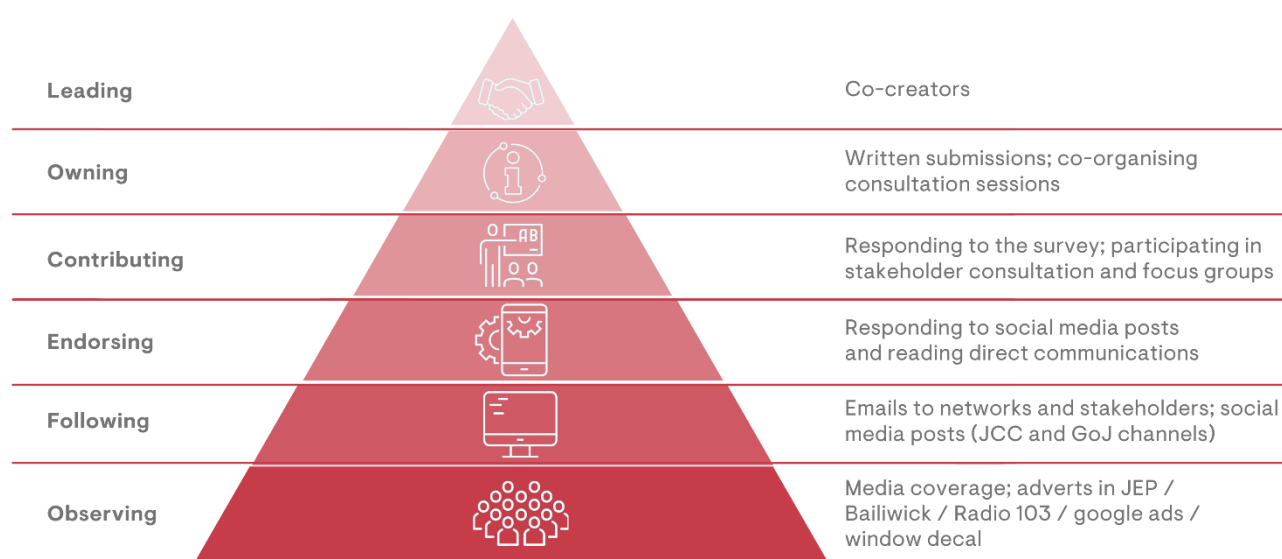


Figure 2: The draft Carbon Neutral Roadmap consultation in relation to the Engagement Pyramid.





## 4. Processing and collating

This section explains how the consultation responses have been processed, collated, and analysed.

### 4.1 Analysis of written submissions

Organisations were invited to send in written submissions. They were invited to either make one overarching submission (max 1,500 words) or to make separate submissions under any or all of the following four categories: transport policies, heating policies, other emissions policies and enabling policies (max 1,500 words each). Although organisations were invited to make multiple submissions there was an upper word limit of 1,500 words per submission. The purpose of this was to ensure that it was possible to fully utilise the content of the submissions. Allowing open-ended responses might have resulted in some extremely lengthy responses where key points may have been overlooked. By asking for submissions to be broken down into topics ensured that no information was lost. Any organisation exceeding the word count in their submission were contacted and asked to resubmit by sending several shorter submissions clearly identifying the topics to which their submission was referring. All of those asked to resubmit did so.

Each of the written responses was read in detail with the key points of feedback noted against each policy by theme in a spreadsheet.

### 4.2 Analysis of individual submissions

14 individuals provided submissions as part of the consultation, most of these were emails sent to the Minister for the Environment, either directly, or through the [climateemergency@gov.je](mailto:climateemergency@gov.je) email address, which is monitored by Government officers.

All individual submissions were put through a redaction process that included redacting their name and issuing a reference number. Each of the individual responses was read in detail and key points of feedback were noted against each policy by theme in a spreadsheet.

### 4.3 Analysis of the focus groups

Insight were commissioned to run five focus groups. These focus groups included one specifically targeting young people under 25 (but over 16). The participants were selected to broadly represent the community and therefore the make-up of the Citizens' Assembly on Climate Change. The outcomes of the survey will be published in a full report.

### 4.4 Analysis of stakeholder engagement events

The original plan for the stakeholder engagement sessions was to hold them face-to-face. However, the COVID-19 winter strategy update meant that most of the sessions were moved online.



There were different stakeholder engagement events designed to understand the views and thoughts of the different stakeholders. Summarised key themes and pertinent points were noted. Some stakeholder engagement events were structured and facilitated by co-creators such as industry bodies who collated notes which were used to formulate their own written submissions. Others were facilitated by Government of Jersey officers.

There were two general public stakeholder engagement sessions held online. The original intention was to hold these in person, but the COVID-19 situation resulted in these being held as two back-to-back zoom meetings. Participants were sent links to MURAL<sup>17</sup> to use during a zoom call. MURAL is an online collaboration tool which allows individuals to anonymously add to a whiteboard (an example of a MURAL board can be seen in [Appendix 11](#)). However, using MURAL was not a positive experience for many of the participants, particularly those who chose to join in the session on a phone. Government officials acted as scribes on behalf of individuals, if required, noting their contributions. This experience resulted in a decision to restructure remaining sessions for future groups to make it simpler for participants. Notes were taken using Microsoft Word and were shared on the screen during the zoom session so that participants could see the notes from the sessions and made sure they represented what had been said.

A stakeholder session was run at the Romerils Trade Centre, following a suggestion from the Jersey Construction Council. It was recognised that many of the policies, in particular the heating policies, would have a direct impact of many of the 'trades' but that those working in that sector would be unlikely to engage in formal consultation processes. An email was circulated by Romerils and the Jersey Construction Council prior to the event (offering free soup to encourage people along). Two Government officers then spent several hours at the centre talking to people at the centre letting them know about the consultation, the draft Carbon Neutral Roadmap, and the policies to better understand their thoughts. Approximately 60 individuals took part in this session. Although participants were encouraged to send through written submissions and to complete the survey the purpose was to listen to the stakeholders with a view to ensuring their opinions would be considered as part of the consultation.

There were three pop-up sessions held in person. Government officials spent time at the Salvation Army café; Central Market and on King Street talking to members of the public. Many individuals did not choose to stop and engage but did take away a QR code which took them to the survey. Approximately 100 people stopped to discuss the Roadmap in more detail, sharing thoughts and ideas and asking questions. Although participants were encouraged to complete the survey, the purpose was to listen to the stakeholders with a view to ensuring their opinions would be considered as part of the consultation.

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<sup>17</sup> <https://www.mural.co/>



All participants at stakeholder sessions were reminded of the survey and invited to make a written or individual submission as appropriate.

## 4.5 Youth engagement

Prior to the COVID-19 winter strategy update there was a full and comprehensive schedule for youth engagement planned. This plan included stakeholder engagement sessions in lots of educational establishments from primary schools to post 16 educational establishments and with informal youth provisions including the Jersey Youth Parliament. Disappointingly most of these planned sessions had to be cancelled due to COVID-19.

The consultation was included in Children, Young People, Education and Skills Government department briefings. Headteachers and school eco teachers were sent detailed information about the consultation including links to the draft Carbon Neutral Roadmap animation, summary document and lesson materials. Schools were encouraged to use the materials as appropriate to their educational setting. One teacher emailed with thanks for the resources saying:

*"The short film was fairly accessible- even for little ones- and we had a good chat about it. "*

Due to the staffing issues and pupil absences, there were not many schools that were able to facilitate responding to the consultation. Some schools chose to share the consultation information with parents and encouraged them to complete the survey as homework.

- two primary schools held their own consultation sessions and sent through their written submissions created with their pupils
- one secondary school facilitated a consultation with Government officers for pupils in Year 7 in accordance with their COVID-19 guidelines. They also sent through a written submission
- one secondary school with sixth form facilitated Government officers running a pop-up session in the school canteen following their COVID-19 guidance. Pupils were encouraged to access the survey using a QR code
- Highlands College organised three focus groups for students, including University College Jersey students, with Government officers to discuss the Roadmap
- one youth project completed a survey with their members
- The Youth Parliament carried out their own survey with young people and then made a written submission.

## 4.6 Analysis of social media

Government of Jersey and Jersey's Climate Conversation social media accounts were used through the consultation:

- Instagram (@climatejsy and @governmentofjersey)





- Twitter (@ecoactivejersey and @GovJersey)
- Facebook (@climatejsy and @GovernmentofJersey)
- LinkedIn (eco active Jersey and Government of Jersey).

Social media sits near the bottom of the Engagement Pyramid as for many they simply 'observe'. However, there was an expectation that people might see the posts and follow the channels and perhaps read and make comments, moving them up the engagement pyramid to following and endorsing and even contributing. Some of the posts were designed to inform whilst others were to elicit a reaction or response to prompt people to complete the survey. There were some relevant comments left on social media. Comments made were captured using Sudota<sup>18</sup> and were put into a spreadsheet and sorted by theme. The number of responses on each theme was then recorded as well as the viewpoint. Comments and interactions were also collated so that it was possible to see if the same account made the same or similar points multiple times. Comments went through a redaction process that included removing the name of the social media account making a comment and replacing it with a reference number.

Social data analytics were collected for each post and story to understand the engagement of each post. They were categorised as follows:

- **reach:** The number of people who saw the post at least once
- **impressions:** The total number of times the post has been seen. This is different to Reach as it may include multiple views of a post by the same person. This metric is estimated
- **engagement:** (including story engagement and reactions / likes): The number of reactions, comments, shares, and clicks on your post.

There were several Instagram polls, the results of which can also be found in [Appendix 2](#).

## 4.7 Analysis of the survey

The survey was made up of 21 questions.

### Questions offering multiple choice answers (quantitative question)

There were 13 multiple-choice questions in the consultation. The nature of these questions allowed for consistent analysis as follows:

- the total number of respondents who responded to the question
- for multiple choice questions, how many responses were received to each option
- the number and percentage each response option received as a proportion of the total number of responses to that question

<sup>18</sup> <https://www.sudota.com/>



- bar charts have been used to visualise how the responses to each question have been broken down.

It was possible to further analyse the responses by age bracket, Parish, and place of birth.

### **Questions to rank pre-determined answers by preference (quantitative question)**

There were 2 ranking questions that allowed Islanders to sort the pre-determined answers into their order of preference. This allowed for analysis as follows:

- the total number of respondents who responded to the question
- the total score of an option
- pie charts have been used to visualise how the responses were broken down.

It was possible to further analyse the responses by age bracket, Parish, and place of birth.

However, some respondents reported difficulties in using the ranking system in these questions. This included confusion ranking 1 was high or low. As a result of these issues the results from these questions cannot be considered conclusive.

### **Free text questions (qualitative question)**

There were six questions which allowed free text responses. A seventh question combined a multiple-choice question with a 'please specify' text box for one answer option. For all comments added to free text questions were read, summarised, and then categorised by topic. Frequently raised points or themes or specific comments which raised key issues were identified.

In compliance with the Carbon Neutral Roadmap consultation privacy notice<sup>19</sup> The survey, including general comments, went through a redaction process to ensure that it was not possible to identify who has completed the survey. There was no obligation to complete the survey or to answer the free text questions. The redacted responses were provided to Scrutiny.

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<sup>19</sup> [Carbon Neutral Roadmap consultation privacy notice](#)



## 4.8 Responses

Responses were received as follows:

Source	Number of respondents (total people)
Consultation survey	1,925
Social media comments	449
Organisation written submission	49
Individual written submission	14
Focus group participants	30
Pop-up sessions	Approximately 100
Other (e.g., phone calls)	7
Total	2,574

## 4.9 Written submission responses

Written submissions were received by the following organisations. The written submissions were redacted and provided to Scrutiny as part of their review into the consultation. They can be found in Appendix 12. Some business names were redacted and are indicated by [Redacted business X].

A Cornish Electrical	Highlands College	Rabeys Group
Affinity Private Wealth	Jersey Business	RBS International
Anneville Farm Limited	Jersey Chamber of Commerce	Reform Jersey
Association of Jersey Architects	Jersey Classic Vehicle Club	Romerils
ATF Fuels	Jersey Consumer Council	Rubis Channel Islands
Beaulieu Primary School Eco Group	Jersey Construction Council	Skipton International
Bikers	Jersey Electricity	St Saviours School Eco Team
Blue Marine Foundation	Jersey Finance Limited	Sun Works (C.I) Limited
Cherry Godfrey	Jersey Gas	Energy Forum
Crawford and Company	Jersey Landlords Association	The Good Jersey Life
Cycle4Jersey	Jersey Milk Marketing Board	The Jersey Estate Agents' Association
Dark Green Carbon Farm Foundation	Jersey Motor Trades Federation	The Jersey National Park
Derek Warwick Honda	Jersey Youth Parliament	The Jersey Old Motor Club
Disability Inclusion Team	Le Rocquier School	The National Trust for Jersey
Durrell Wildlife Conservation Trust	Pallot Steam, Motor and General Museum	[Redacted business 1]
Energy Forum	Ports of Jersey	[Redacted business 2]
Equilibrium Futures (Jersey) Limited	Public Health, Government of Jersey	[Redacted business 3]





# 4.10 Responses to social media and consultation awareness campaign

To raise awareness of the consultation, a media campaign was delivered including advertisements and social media. Details of the social media posts and engagement figures can be found along with copies of the advertisements in [Appendix 1: Social media posts](#).

Summary of the number of social media posts by channel

GoJ Facebook	GoJ Instagram	GoJ Twitter	GoJ LinkedIn	climatejsy Facebook	climatejsy Instagram	eco active Twitter	eco active LinkedIn
12	8	14	11	25	25	13	6

## 5. Findings

The responses to the consultation have been aligned to the strategic policies set out in the Carbon Neutral Roadmap Preferred Strategy<sup>20</sup>. Consultation responses have been categorised by method of engagement.

### 5.1 Strategic policy 1: Jersey's net-zero emissions pathway

The Paris Agreement was adopted by 196 Parties at the 2015 Conference of Parties. Work is underway to have The Paris Agreement extended to cover Jersey. Strategic policy 1 sets a minimum emissions pathway for Jersey to:

- reduce emissions by at least 68% compared to our 1990 baseline by 2030
- reduce emissions by at least 78% by 2035
- deliver net-zero emissions by 2050
- stay in line with science-based global emissions reduction targets needed to limit global warming to 1.5°C.

#### Written submissions

Comments were largely supportive of the draft Carbon Neutral Roadmap and commitment to becoming net-zero in alignment with the Paris Agreement. However, there some would like to see increased ambition and other were concerned about the economic impact of the pace of change:

*"There is strong support for the overarching objectives of the Carbon Neutral Roadmap... Jersey has a responsibility, as a developed economy, to take strong and urgent action to address the climate emergency... Younger professionals are especially anxious to see strong action to tackle climate change from both Government and employers. If Jersey cannot deliver tangible action that is aligned with those values, it risks losing its attractiveness as a talent hub...Supporting the objectives of the Paris Agreement and the fight against climate change is increasingly seen as an important part of that" – Jersey Finance Limited*

*"Our overall position is of support...Can we afford this? Will the products be available for us to achieve this? Are we being overly ambitious?" – Romerils*

*"C4J is broadly supportive of the policy objectives and signalling of the CNR. It is great to see Jersey committed to a globally recognised pathway aligned with the Paris Agreement." – Cycle for Jersey*

*There could be shorter deadlines...We are making progress, but I don't feel like we're making it fast enough. We need to start implementing things quicker and adding more pressure to get things done... 2050 is not soon enough." – Jersey Youth Parliament*

<sup>20</sup> [Carbon Neutral Roadmap Preferred Strategy \(gov.je\)](https://www.gov.je/carbon-neutral-roadmap-preferred-strategy)



*"The Council's biggest concern is that many Islanders will be negatively impacted both financially and by the suggested timeframe" – Jersey Consumer Council*

### Individual submissions responses

The individual submission from respondent 911 ([Appendix 13.11](#)) was concerned about the level of ambition throughout their submission.

*"The Roadmap must be more ambitious. there is no reason that Jersey cannot 'lead the way' in efforts to decarbonise. We should bring forward deadlines to meet energy reduction and targets for carbon neutrality, with carbon zero (or as near to it as possible) being an early ambition... The roadmap needs clearer and better-defined targets so that progress can be monitored... We must seek carbon neutrality by 2030 as a goal... We must focus on decarbonising as fast and as deep as possible and offset as little as we necessarily can." - 911*

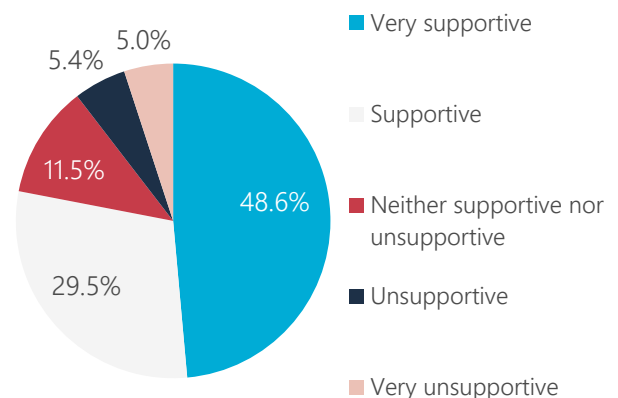
### Survey responses

Question 6: *Almost 200 countries across the world have signed up to the Paris Agreement on climate change, which aims to limit global rise in temperatures to 1.5 degrees. After 1.5 degrees, the impacts of climate change will get worse, faster.*

*The Carbon Neutral Roadmap commits Jersey to the Paris Agreement targets. In 2019, Jersey had reduced its emission by 36% compared to a 1990 baseline. The draft Carbon Neutral Roadmap aims to make this a 68% reduction by 2030, and a 78% reduction from the baseline by 2035. How supportive are you of this plan?*

78% of respondents were either supportive or very supportive of adopting the Paris Agreement targets.

Answer Choice	Response Percent	Response Total
Very supportive	48.6%	935
Supportive	29.5%	567
Neither supportive nor unsupportive	11.5%	222
Unsupportive	5.4%	104
Very unsupportive	5.0%	97
answered		1925
skipped		0



Survey question 6 was a quantitative question, so respondents were not able to clarify their response. It does not provide any additional information on why the 'neither supportive nor unsupportive' respondents selected this option. Whilst we cannot say why they answered in this way, from the written responses, stakeholder engagement sessions, and responses in other questions (see strategic policy 5). There appears to be some confusion about the 2030/2050 target dates and the terms carbon neutral



and net-zero. It was not understood that these are two different terms and that becoming carbon neutral by 2030 was an option explained in strategic policy 5. During stakeholder engagement sessions, especially those with the public, comments were made that people felt unable to rank themselves as either supportive or very supportive as they felt 2050 was too late and that the States Assembly had already committed to 2030.

When answering *Question 21 (Do you have any other comments on the draft Carbon Neutral Roadmap?)*, 75 comments were made relating to the date / speed of transition and targets of the transition. 41 of these expressed a desire for the targets to be brought forward.

*"It is not nearly ambitious enough; it is very narrow in scope. Real change is needed, much faster than 2050."*

However, 10 felt that we should aim to meet the Paris Agreement targets:

*"Why does Jersey need to lead the way as a small Island it should be on the average trajectory "*

17 disagreed with signing up to the Paris Agreement, suggesting it is too ambitious:

*"Jersey should not be driven by the Paris Agreement which could result in mandating expensive, hasty and ineffective actions in the Island..."*

## Social media comments

There were not many social media comments relating to strategic policy 1. There were questions around the terms used but also about the ambition set out in strategic policy 1.

*"What is the difference between carbon neutral and net zero? Please do not say 20 years? 😊😊"*

*"The word "crisis" tends not to be followed by a solution that's over 2 decades away..."*

*"The place is full of dreamers in the time scale you reckon this will happen."*

## Summary

Most consultation responses support strategic policy 1: Jersey's net-zero emissions pathway. There were comments challenging the level of ambition but aligning with the Paris Agreement was considered to be a positive step but for some was not seen as ambitious enough. There was clear confusion about the 2030/2050 target dates and the terms carbon neutral and net-zero. Many of those who participated in the consultation believed that the States Assembly had already agreed the target date of 2030 and found the Paris Agreement targets confusing and considered them to be less ambitious.



## 5.2 Strategic policy 2: Island energy market

Strategic policy 2 sets out how we will decarbonise our energy supply. Jersey currently accesses low-carbon electricity from France. At the moment, our electricity model provides affordable, low carbon, reliable and secure electricity. Government will:

- establish new research and advisory partnerships with energy systems experts
- explore opportunities to trial new and emerging energy solutions in Jersey.

A new Minister for energy and climate change has been recommended to oversee an energy market review.



Figure 3: The energy trilemma.

### Written submissions

The written submissions from Jersey Electricity can be found in [Appendix 12.24](#).

*"Given that electricity in Jersey is already virtually completely decarbonised, we have long maintained that the fastest and most cost-effective route to further reducing Jersey's emissions is therefore by displacing fossil fuels for heating and road transport with low carbon electricity. Low carbon power is already available to Jersey in almost limitless supplies (in the context of the Island) due to JE's strategy of investing in secure infrastructure and importing a blend of nuclear (4g CO<sub>2</sub>e/kWh) and hydro (6g CO<sub>2</sub>e/kWh) power from the European grid. Furthermore, this strategy is entirely compatible with the development of large-scale local renewables (such as offshore wind, tidal power and ground based solar PV) as and when they become economically viable – technologies which JE is exploring and investing in." – Jersey Electricity*

*JE believes it can greatly assist in the rapid electrification of Jersey and crucially, do so in a manner that ensures continued delivery of affordable, secure and sustainable energy for our Island. We believe that the grid will provide a critical role in the energy system for many years. Fully leveraging these grid assets, which are entirely compatible with future technologies, will result in more competitive electricity prices for consumers because the greater the volumes of electricity distributed through the network, the more efficient and economical it is to operate" – Jersey Electricity*





There was a general concern raised in written submissions about energy security with reliance on a single energy source increasing the Island's vulnerability. There was a desire to see renewables in the make-up of Jersey's energy market going forward to reduce the reliance on imported electricity. The energy market review was generally seen as an important step.

*"...the proposed and important Energy Market Review to be conducted over the next 12 months or so which will develop transition plans in conjunction with the major energy market actors and through the creation of Carbon Neutral Alliance we are confident of continued involvement and engagement in the process."* – **Energy Forum**

*"The energy market review and subsequent policy is critical to the successful implementation of the CNR. We are significantly concerned that the current timings will have an adverse impact on the ability of the industry to facilitate an energy transition. A competitive energy market with a mix of energy sources will help to provide the balance in the energy 'trilemma'...The energy market review will help to address competition in the local energy market in the long term, our greatest concern is the short-term stifling of competition...We are concerned with communications that do not represent the other sources of energy fairly, there often seems to be a message of the only way to be carbon neutral is to go electric. This is not the case, and we would like to see more balance, which will recognise the need for an energy mix going forward. This will help to provide security to those householders who are concerned they are being 'forced' to switch to electricity."* – **Rubis Channel Islands**

*"We are pleased that the role of imported electricity is acknowledged as 'having served the Island well' in terms of balancing the trilemma of sustainability, security and affordability, and that it is key to further rapid decarbonisation of road transport and space heating. We recognise that rapid electrification using low-carbon grid power is the fastest and most economic route to net-zero... Though local renewables, such as solar, wind or tidal power, will not reduce carbon emissions they will increase supply diversity and could improve energy sovereignty. Large scale renewables, such as offshore wind, could become cost effective for Jersey and we are working hard on this as an opportunity for the Island, but the capital investment required could result in costs being materially above current imported market rates in the early stage..."* – **Jersey Electricity**

*"...We believe everyone who uses energy should have the ability to contribute to achieving decarbonisation...Reducing energy use is key to reducing carbon emissions. In the medium and longer term we are working towards offering clean energy, green gas that produces zero emissions. We hope to make the transition for customers as cost effective and easy as possible, by using existing infrastructure where possible... we recognise that the implications for our business could involve very significant costs if the business became economically unviable. Similarly, we believe that the energy strategy for the Island should seek an integrated solution... The emission levels of oil and gas are not equal and Jersey Gas reasons the roadmap distinguish between the two fuels. There are also practical challenges to switching out the use of oil and gas. Their use to-date reflects in part an under investment in the Island's electricity grid and associated infrastructure. Many consumers in both the domestic and commercial markets cannot rely on electricity to meet their heating, cooling and cooking needs..."* – **Jersey Gas**



*"A review of the potential in Jersey of hydrogen power and of tidal power, and ongoing consideration of all renewable power, for interests of heating and power sovereignty must be considered. Jersey is in a fortunate position in that we own our utilities (except Jersey Gas) and can therefore play an active role in setting their strategic direction, based on our political priorities..." – Reform Jersey*

## Individual submissions responses

Individual submission with the reference 903 ([Appendix 13.3](#)) voiced concern about importing low-carbon energy from France:

*"Whilst it is good that most of our electricity comes from low carbon French sources, if we are thinking globally, wouldn't it be better if we left that good green stuff for another country on the European grid that would otherwise burn fossil fuels to make its power? Essentially, instead of piggybacking off a politically unstable neighbour, we should grow a bit more of our own and add to the world's stock..." - 903*

Individual submission with the reference 912 ([Appendix 13.12](#)) wanted more renewable energy sources in the Roadmap:

*"Please though, can we make some serious attempts to capitalise on our significant tidal range to generate our own energy?" - 912*

## Survey responses

All questions with free text included comments relating to strategic policy 2: Island energy market. Concerns were raised about the energy trilemma with energy security, availability and price being common themes throughout the survey responses.

*"It would be probably better to have energy locally produced, but that is mind blowing expensive."*

Question 20 asked: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?*

In response to Question 20, 73 respondents commented about wanting to see more done regarding renewable energy at either micro or macro level:

*"Every new build should have solar panels"*

*"Jersey should look into alternative power for the Island and to take advantage of our natural resources. We have some of the largest tides in the world, and we are well known for being both very sunny and very windy. By using these Jersey should be able to be run entirely on clean electricity."*



Concerns about energy security and supply appeared to be a fundamental issue and there were lots of comments on this through the survey. 31 respondents specifically commented on this in response to Question 20:

*"Sourcing electricity - although the Island sources most of its electricity from nuclear, we should be looking to source more from renewable sources. On Island solar panels, wind turbines, etc should be put as a priority, this not only provides more independence and self-sustainability for the Island but can create local jobs and incomes."*

However, another theme that came through strongly in the survey responses was the cost of installing suitable cables (three-phase electric power) to the door. This issue was particularly raised in response to policy TR1: Speeding up adoption of electric vehicles and HR1: Supporting low carbon heating systems and home insulation:

*"... We have been quoted an estimate of £70,000 to install an electric air source replacement. Mainly because of the work involved to get larger cables to our house which is about 1/4 mile from the road down a long farm track. This is a material problem when you try to power several heavy demand items on one domestic supply."*

## Social media comments

Social media comments raised concerns about the energy trilemma and were similar to those in the survey. Those commented raised concerns that the electricity supply is not secure and reliable; green and clean; affordable and available.

*"So, are you suggesting we will have to be all electric? Can you guarantee a continuous, reliable source and that the price won't rocket without other competition? I'm also concerned that although electricity is clean at point of use it certainly isn't clean at source yet."*

## Summary

There were a lot of comments, 289 in the survey alone, regarding strategic policy 2, including concerns about energy security, availability and price. These concerns were raised throughout the consultation. The cost of 'the last mile' were raised as a potential barrier to decarbonisation. The costs associated with installing three-phase electric power and other cabling was felt to be a prohibitive cost and a genuine barrier. There was additional concern that electricity supply comes from a monopoly provider. This included concerns that without market competition, prices may rise, causing income inequality.

Many of these concerns regarding the energy market were summarised succinctly by one survey respondent:

*"Will the JEC infrastructure be able to cope with the massively increased demand, especially at peak times? Will the inter connectors be able to cope with the massively increased demand, especially at peak times? Will the current electricity suppliers (mainly France) be able to cope with the massively increased demand especially at peak times?? Will the on Island electricity generators being to meet the demand if the current suppliers (mainly France) is unable to supply the required power, due to increased demand in that country or political reasons?..."*



### 5.3 Strategic policy 3: Financing strategy

Becoming net-zero is a huge economic challenge. The Climate Emergency Fund will be a source of income to help pay for Jersey's carbon neutral journey to net-zero. Extra funding will be needed to decarbonise Jersey's economy.

- the Carbon Neutral Roadmap will outline how the current funds in the Climate Emergency Fund will be spent
- in 2022, Government will propose new economic instruments such as travel duty or road user charges
- a long-term financing strategy to continue funding decarbonisation will be published in 2023.

#### Written submissions

The need for additional funding to fully decarbonise Jersey's economy was fully recognised in many of the written submissions. Responses gave short-term, medium-term, and long-term solutions for the development of a financing strategy. Some respondents also provided comment in the support needed for Islanders to transition to low-carbon lifestyles.

*[There is a] "significant funding gap inherent in the CNR... of around £220m to 2030 which needs to be met if the Paris Agreement targets are to remain within reach. This creates significant risk for Jersey that we will not remain on track to meet our international obligations. It also creates significant uncertainty as regards future revenue raising measures. This is a source of concern for an Island that prides itself on offering fiscal stability. Our members made several suggestions on how to address this funding gap, principally: through access to sustainability-linked debt and private capital, leveraging the role of the local finance sector...the success of the CNR will depend in large part on building effective collaborations with the private sector. This is just as true for the finance sector as it is with other parts of the economy. Building partnerships and "cross-overs" with the finance industry would support the policy objectives of the CNR..." - **Jersey Finance Limited***

*"Climate change is the biggest challenge facing society today and the financial sector has a critical role to play in tackling it...RBS International is an adamant supporter of the just transition, understanding that both climate change and the pace at which we transition to a net zero economy will have societal costs...The Roadmap places a focus on consumer spending but the financial industry must acknowledge the climate impact of financing activity and introduce new measures to deliver sustainable lending...The orderly introduction of environmental, social and governance (ESG) reporting standards would bring Jersey in-line with the UK as disclosures under the Task Force on Climate Related Financial Disclosures (TCFD) framework become mandatory..." - **RBS International***

*"... Within our finance arm, Cherry Godfrey works with many Jersey companies to offer incentivised finance solutions for domestic and commercial 'green energy' loans. This ability would marry well with the government grant scheme and Cherry Godfrey could solve a potential 'roll out' solution..." - **Cherry Godfrey***

*"...Ongoing collaboration between the finance industry, the Jersey Financial Services Commission and the Government will be essential if the Island is to deliver a number of the Roadmap's goals." - **Affinity Wealth***



Strategic policy 3: Financing strategy was also felt to be key to the Just Transition:

*"The proposed financial subsidies are insufficient, especially with low to middle income earners struggling with ever increasing prices of essential goods, like food, energy and fuel, and the reduction, and expected eventual removal, of GST de minimis on imported goods" – Jersey Consumer Council*

## Individual submissions responses

Individual submission from 910 ([Appendix 13.10](#)) considered the Just Transition, amongst other points.

*"Sadly, the long-term goal of carbon reduction will impact those in society with the lowest incomes. Government "grants" to assist our move to net-zero are from tax revenue and therefore there will be less money for other Government spending. Also, businesses can't absorb all these extra costs, so items will become more expensive. With the high cost of living in Jersey and very high housing costs, Jersey must work hard to reduce the financial impact on those with lower incomes." - 910*

## Survey responses

There was a general acceptance that there would be an introduction of new economic instruments and that money raised should be used to fund Jersey's decarbonisation. Throughout the survey responses there were many suggestions of financial incentives and disincentives.

The question of who should benefit from incentives received mixed responses in the free text questions. In the survey, 102 people felt that those on lower incomes (or middle incomes) should be targeted for any financial incentives.

*"Electric vehicles are incredibly expensive. I'm very passionate about reducing our household carbon footprint and helping Jersey reach its targets, but for us, the cost makes them out of reach. A reasonable government grant to reduce the cost would help us make this change. I also think there needs to be additional help for lower income families as grants would still only enable a small percentage of car owners to switch to electric."*

However, there were 34 responses which indicated that incentives should be across the board:

*"Reduced initial cost of electric vehicles. This is a huge barrier. We have high income but high outgoings and can't afford an electric car"*

Some respondents shared suggestions to what these economic instruments should be. Common ideas for transport disincentives included:

- ending the use of 'red diesel' for non-commercial boats and planes
- increasing taxes on petrol and diesel
- taxing cars based on engine size and emissions
- higher taxes for those that don't drive an electric vehicle
- taxes on mileage – the number of miles covered with fossil fuel vehicle.





*"Creating an annual 'carbon tax' for polluting vehicles that ramp up over a number of years would pretty quickly incentivise us to look for alternatives."*

*"Private jets flying into and out of Jersey have a massive carbon footprint, but I understand they (and expensive speed boats) are not taxed on their fuel as much as normal petrol for example"*

Heating policies had a similar response, with common suggestions including:

- A carbon tax on polluting heating fuel sources
- Increased fuel duty on fossil fuels.

*"I'd like to see subsidies for the poor to change their heating source and a tax on heating fuel which means well off people change because it's cheaper to do so."*

*"Increase taxes on fossil fuels to fund subsidies and encourage a switch to more sustainable heating"*

However, an overwhelming theme was that any economic instruments should not result in increased poverty and that this was an opportunity to think about things differently:

*"There is no point giving money to already wealthy people and contractors."*

*"Heating incentive needs to offer more to low-incomes and assurances to those in rented accommodation that their rent will not increase as the home they live in is improved."*

*"The cost of one. I can't afford to pay for one outright but can easily afford to pay monthly, but reluctant to borrow money with interest attached to it as my car is absolutely fine. If the government came up with a scheme whereby you were allowed to borrow and pay them back over a 5/10-year period interest free that would be great."*

## Social media comments

Social media commenters raised concerns about the cost of delivering the draft Carbon Neutral Roadmap and the potential impact that this will have on Islanders in terms of additional taxes and charges. This is important in relation to the Just Transition:

*"'Subsidies and incentives' - 'green-speak' for 'the taxpayer will pay through the nose for this, and it will make zero difference in the overall scheme of things'"*

*"How much is all this going to cost taxpayers and households?..."*



## Summary

There is broad agreement for strategic policy 3 – Financing strategy. There were many suggestions put forward for what these economic instruments might include, but it was evident that there is not one clear solution that will make solving the financing issue universally accepted.

It was accepted that there is a requirement for new economic instruments and that tax should be used to incentivise and disincentivise. It was preferable for any money raised from new economic instrument should be used to fund Jersey's decarbonisation. However, an overwhelming theme was that any economic instruments should not increase income inequality which sits with the principle about the Just Transition.

## 5.4 Strategic policy 4: Policy programme and development

The Carbon Neutral Roadmap will include policies to reduce carbon for the next term of Government (2022-26). The policies in the draft Carbon Neutral Roadmap were informed by a wide range of work including the recommendations of the Citizens' Assembly on Climate Change<sup>21</sup>.

Principle 5 of the Carbon Neutral Strategy states that carbon neutral policies must not increase overall income inequality on Island.

Greenhouse gas emissions are generated when fossil fuels are burnt. In Jersey, most of our emissions are generated when we drive petrol and diesel vehicles and in the boilers that heat our homes and business premises. So, to meet the reduction targets set out in strategic policy 1, we need to change how we fuel our vehicles and how we heat our buildings.

Part C of the draft Carbon Neutral Roadmap sets out a prioritised delivery plan for 2022-25. The policies in this delivery plan were assessed against a series of criteria, including the potential for policies to lead to carbon abatement and a consideration of other potential costs and benefits. These assessments were considered by the Carbon Neutral Steering Group and Council of Ministers when preparing and reviewing the delivery plan. Each policy was developed through detailed analysis. This included Distributional Impact Assessments.

There were four categories of policy identified in the delivery plan for 2022-25.

Initials	Category	Explanation	Number of Policies
TR0	Transport policies	Transport emission reduction policies	11
HT0	Heating policies	Heating emissions reduction policies	3
OE0	Other on and off-Island emissions policies	Policies that tackle other on and off-Island emissions	6
EN0	Enabling policies	Policies that enable delivery and implementation and support the systemic change needed to make a just transition to a low-carbon economy	6

<sup>21</sup> [Achieving Carbon Neutrality: Report of Jersey's Citizens' Assembly on Climate Change \(gov.je\)](https://www.gov.je/achieving-carbon-neutrality-report)



The responses to each of the policies set out in the delivery plan 2022-25 are detailed below.

## 5.5 TR0 Transport policies

As well as written submissions from individual organisations, there were some written submissions made by industry bodies on the transport policies:

- The Jersey Motor Trades Federation submission can be read in full in [Appendix 12.29](#)
- Jersey Chamber of Commerce transport submission can be read in full in [Appendix 12.20](#)
- Jersey Construction Council transport submission can be read in full in [Appendix 12.23](#)
- Jersey Business transport submission can be read in full in [Appendix 12.19](#).

## 5.6 TR1 - Speeding up adoption of electric vehicles

### Written submissions

There were 27 written submissions that considered policy TR1: Speeding up adoption of electric vehicles. These included submissions from individual organisations and those made by industry bodies on the Transport policies.

### Purchase subsidy

The value of the incentive was commented on in many of the written submissions relating to policy TR1. Seven written submissions raised issues relating to commercial vehicles. Many of the written submissions called for commercial vehicles to be considered separately to privately owned cars. However, it was widely accepted and agreed that the policy refers only to cars and small vans.

A common theme was that a subsidy of up to £3,500 was not enough of an incentive to purchase an electric vehicle, and that a cap on the maximum price of a vehicle at £30,000 was too restrictive to achieve the targets. This was applicable to both domestic vehicles owners and commercial vehicles:

*"The purchase price cap of £30,000 is too low as even a small, modest Fiat 500 EV costs more than £30,000. We would suggest a price cap of at least £40,000 for cars and £50,000 for commercial vehicles. We suggest that much more thought be given to how any incentive will work" – Jersey Motor Trades Federation*

*"Make electric cars more affordable... push the date forward to make everyone own an electric car" – Beaulieu Primary School Eco group*



## Charging infrastructure scale-up plan

*"...We welcome the charger subsidy of £350 although we are very cynical that enough households, especially those living in flats will have the ability to install charging points to achieve the volume of EV's required in the plan. We also understand that the current feed to many households is not of the capacity required to install a single phase 7.4kw charging point. This means most households will have to charge using a standard 3pin plug charger which is a potential safety risk if used with an extension lead" – **Derek Warwick Honda***

*"Costs of mid-size, and above, electric commercial vehicles are currently prohibitively expensive and unreliable. We respect that this is not coming into play until after 2030, and technology will improve, but currently this is not at all feasible so mid-size / large vehicles should not be included in this policy" - **Romerils***

*"The target of 2,500 grants for electric cars will impact just 2% of the Islands registered vehicles. Whilst an excellent signal, it will not do enough to transform the transport sector and meet the CNR goal. Ways should be found to increase the number of grants or to add additional incentives. Could this be increased to 10% or more?" – **Equilibrium Futures***

There were concerns about the practicalities of charging:

*"Jersey has over 100 public EV charging spaces, more per capita than the UK... We would like to see Jersey adopt a similar strategy to England, legally requiring all new homes and buildings to install smart-enabled EV charging points from 2023. GoJ could help accelerate expansion of the public network (both on street and in car park) and simplify the process for home installations by easing planning constraints and costs. We support the creation of a scheme like that in the UK whereby EV chargers receive 'permitted development' status..." - **Jersey Electricity***

## Other initiatives

*"Ensure company owned EV's also qualify for parking concessions... JE ought to be tasked with introducing an off-peak tariff for charging EV's." – **Sunworks***

*"Ensure that there are charging points in blue badge spaces" – **Disability Strategy Group***

## Other comments relating to policy TR1

The existing proposal is restrictive:

*"As a motorcycle dealership we see customers on a regular basis looking to change to light weight motorcycles or road legal scooters ('powered two wheel' transport or 'PTW') as an alternative to using a car... Affordable, silent, zero emission electric mopeds and scooters/light motorcycles are becoming readily available with an acceptable range perfectly suited for commuting or short local journeys. These vehicles can typically be charged from a standard household three pin socket and have batteries which can easily be removed for charging, thereby alleviating the need for expensive charging infrastructure." – **Bikers***



There are other benefits that will be realised from delivering policy TR1:

*"Public Health supports the move towards fully electric vehicles rather than hybrid or alternative fuel. Other fuels can introduce different health implications due to their impact on air quality." - Government of Jersey*  
**Public Health**

### Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session would potentially be directly impacted by policy TR1 as most have vans and other commercial vehicles. There were concerns that there is a shortage of reasonably priced electric vans available to buy. Purchasing a new van was considered a considerable investment and not something that is done unless necessary. The incentive would not persuade those in the different trade to change their vehicle unless it was a vehicle they were already considering replacing. Charging infrastructure was a key concern with many employees taking work vehicles home or leaving them overnight in public car parks. Most reported that a lack of charging infrastructure would mean that they would not consider buying an electric vehicle.

### Individual submissions responses

Individual submission from 907 ([Appendix 13.7](#)) questioned the consideration of the Just Transition in policy TR1:

*"You don't seem to be considering the normal working-class people who live in Jersey. Everything you are doing is very easy for those rich people who live here to comply with. An electric vehicle is way beyond the reach of most ordinary families and there aren't many second-hand vehicles available." - 907*

Individual submission 904 ([Appendix 13.4](#)) raised the issue of voiced concern about Loi (1991) sur la copropriété des immeubles bâtis Law<sup>22</sup>, specifically with reference to fitting of electric power points for vehicle charging in car parks in co-ownership buildings.

*"I live in XXX where there are XXX car parking spaces. Non have electric charge points (I feel basic plugs are OK for Jersey) and I have been requesting at owner meetings that we get quotes for having electricity routed to each space, to allow for car charging. The Articles of Association as complying with the law, states that any changes to the parking spaces have to be agreed by 2/3rd majority, in this case XXX. As, you can imagine, with a XXX in the development, there is little or no incentive to vote in favour, at least not by 2/3rds of the owners, so in short, no one can have an electricity supply"- 904*

<sup>22</sup> Loi (1991) sur la copropriété des immeubles bâtis - Law (1991) on the co-ownership of buildings (unofficial translated version: <https://www.jerseylaw.je/laws/translated/Pages/18.180.aspx>)

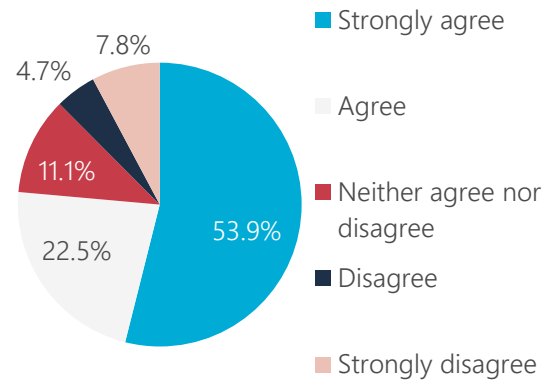




## Survey responses

Question 10: *To what extent do you agree that a financial incentive should be provided to encourage people to buy electric vehicles?*

	Answer Choice	Response Percent	Response Total
1	Strongly agree	53.9%	1038
2	Agree	22.5%	433
3	Neither agree nor disagree	11.1%	214
4	Disagree	4.7%	90
5	Strongly disagree	7.8%	150
		answered	1925
		skipped	0

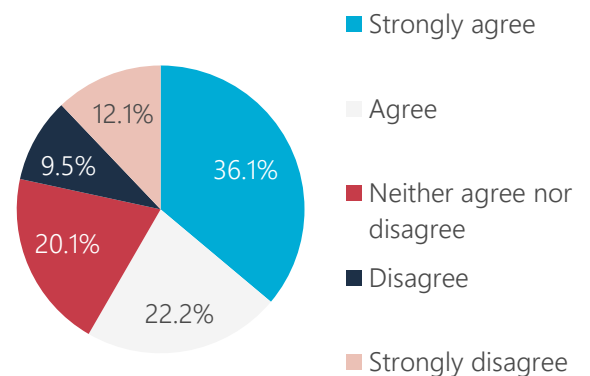


Question 10 was answered by all respondents to the survey. The majority (76.4%) of respondents either agreed or strongly agreed that an incentive should be provided to encourage people to buy an electric vehicle. Compared with 12.8% who either disagreed or strongly disagreed.

The results to Question 11 were a little less clear. 58.3% of respondents agreed or strongly agreed that financial incentives should be targeted to provide more support for those on lower incomes. 21.6% of respondents either strongly disagreed or disagreed. However, looking at these results by age, 71% of under 21s either agreed or strongly agreed whilst only 3% disagreed or strongly disagreed. This is a stark contrast to the results for the over 70s where 42% agreed or strongly agreed and 37% either disagreed or strongly disagreed. So, young people are more supportive of targeting financial incentives to those on lower incomes.

Question 11: *To what extent do you agree that any financial incentive should be targeted to provide more support to those on lower incomes?*

	Answer Choice	Response Percent	Response Total
1	Strongly agree	36.1%	695
2	Agree	22.2%	428
3	Neither agree nor disagree	20.1%	386
4	Disagree	9.5%	183
5	Strongly disagree	12.1%	233
		answered	1925
		skipped	0



Question 8 of the survey was free text: *What else would make you more likely to switch to an electric vehicle when you next change your car?...* There were 1572 responses to this question, some responses covering a variety of topics.

Topic of response	Number of respondents who addressed the topic
Price, including the Just Transition	1007
Charging / electricity supply	224
Concern over battery manufacture and / or disposal	148
Lack of suitable vehicle / range of vehicle inadequate or perceived to be inadequate	112
Don't want an electric vehicle	77
Parking	54
Other transport related comment	24
Other	23

Price and the Just Transition was the main area for comments with 1007 respondents addressing this issue. Many respondents were keen on the idea of owning an electric vehicle but found the cost prohibitive:

*"I am very supportive of electric vehicles and have wanted to buy an electric car for a number of years, however the cost makes it prohibitive. Subsidising the cost would be important to me, especially as we would be less likely to be able to buy a cheap second hand 'run-a-round' vehicle, given the low numbers of electric cars out there."*

The level of the subsidy was also raised frequently:

*"Cheaper - they are expensive even with the subsidy"*

There were also many comments relating to charging and electricity supply. A common theme was concern for those without off-road parking, especially those living in flats and apartments. There was also concern regarding the 'last mile' with some respondents reporting quotes for caballing and three-phase electric power installation being prohibitive:

*"Nothing! I can't afford to live in Jersey and buy a 30k plus car! Nor do I have a viable option for charging as I live in a block of flats..."*

*"I would like to buy an electric car ASAP, but the cost of improving my electricity supply is prohibitive. This is the same for electric central heating. A rough estimate from the JEC a few years ago indicated I would need to pay around £19,000 to increase supply capacity to my home. It cannot be left to householders to shoulder the burden of this cost if the govt want this strategy to succeed..."*



It was also evident that there were real concerns about the manufacture and disposal of batteries:

*"...still concerned about the environmental and social damage from mining the Lithium, Nickel and Cobalt and the fact that it appears that recycling the present generation of batteries is difficult due to their design."*

There were lots of comments from respondents who were positive about the transition to electric vehicles there were many who were firmly against the idea:

*"I would rather cut my own legs off with a spoon than buy an electric car"*

Responses to Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*) included 14 comments on the issue of commercial vehicles. It was broadly commented that the cost of an electric commercial vehicle is generally higher than the £30,000 price cap as stated in the policy, so there is a need to treat commercial vehicles differently:

*"Incentives for companies to move their vehicle fleets to electric"*

*"Why isn't the primary focus on commercial and heavy vehicles becoming electric - given they are the biggest polluters?"*

## Social media comments

There were several Instagram polls relating to policy TR1. The results of which can be found in [Appendix 2](#).

One open-box question asked, *"What would encourage you to buy an electric vehicle"*. Some of the comments made by respondents were then shared as polls asking followers if they agreed or disagreed with the suggestions of others:

- 215 people (91%) of those who took part agreed that *"more free charging spaces and free parking"* would encourage them to buy an electric vehicle
- 127 people (72%) who took part in the poll agreed that having *"charging points installed for residents of for flats and apartments"* would encourage them to buy an electric vehicle
- 208 people (89%) of those who took part in the poll agreed that *"Subsidising the cost of electric vehicles"* would encourage them to buy an electric vehicle *"as they can be expensive"*.

There were lots of social media comments on electric vehicles:

Including 22 comments on vehicle charging, specifically the infrastructure for off-road parking (flats and apartments):



*"So, who is going to pay for all the charging points in garages under apartment blocks and is every government parking going to be charge points in every space for those with no private parking?? Who's going to pay for that to happen I wonder."*

- 6 comments on what electric vehicle batteries are made from:

*"let's get the true figure for producing lithium and cobalt shall we, oh no you can't, the amount of mining activities needed and then recycling batteries will negate any so-called carbon offsets, Massive Con Job"*

- 7 comments on how electric vehicles will be disposed of:

*"Wait for the taxes that will come for disposing those batteries in the future this will not be good for pollution"*

- And 3 comments on the range and longevity of batteries:

*"The electric car is no good for me as I regularly drive through France to Switzerland and the range is only one hundred miles. How does that work? Also, there are too few charging points available for those without garages. Do they really want to be sitting in the car at say Long beach for several hours? Disposal of cars and the lithium batteries another huge problem. Hydrogen possibly way forward. At moment electric cars not practical for many people."*

There were also 17 comments on the incentive on offer. Most comments suggested that the proposed subsidy will not incentivise Islanders to switch to an electric vehicle:

*"Remove GST from EV's, that would be a start in the right direction."*

*"Lots of people can only afford cheaper vehicles"*

## Summary

Views on electric vehicles are mixed with Islanders having concerns over the manufacture, disposal, and range of batteries. Large electric commercial vehicles are not thought to be viable options at the moment, although it was widely recognised that these vehicles spend the most time on the road. Smaller vans are viable but have limited availability as demand is exceeding supply.

Overarching themes that emerged from the written submissions were:

- general support for a subsidy
- there needs to be a higher incentive for commercial vehicles as they are the vehicles which spend the most time on the road
- respondents were concerned about charging infrastructure, especially for flats and other properties with no off-road parking. There were also concerns raised for businesses charging large fleets
- concerns were raised about the capability of the electricity network to cope with demand



- currently parking incentives, such as are only available to domestic vehicles. Respondents would like to see these incentives extended to commercial vehicles
- the subsidy on offer is not enough of an incentive for those on a low income
- the targets quoted are unrealistic as there are not enough electric vehicles available to buy due to global demand
- the subsidy cap is too low for both domestic and commercial vehicles
- the scrappage side of this policy is open to abuse and won't get any additional vehicles off the road as most traded in vehicles with a value less than £500 would be scrapped anyway
- there is a need for green financing and loans.

## 5.7 TR2 - Vehicle scrappage incentive

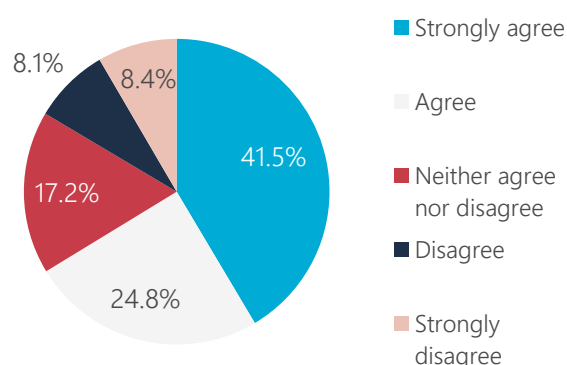
Policy TR2 - Vehicle scrappage incentive proposes to introduce a vehicle scrappage scheme to target the most polluting vehicles. Petrol or diesel cars or small vans that are over 10 years old (manufacture date 2012 or earlier) would receive a £500 green living credit if they are scrapped. It was suggested that a green living credit could be spent at registered businesses for the following:

- public transport credit/season tickets
- electric/pedal bikes
- electric cars
- mopeds or other vehicles
- low/zero carbon heating systems
- energy efficiency measures
- renewable energy
- battery storage and electric vehicle charge points.

### Survey responses

Question 9 in the survey directly considered policy TR2: Vehicle scrappage incentive. *To what extent do you agree that a financial incentive should be provided to encourage the owners of the most-polluting vehicles to scrap their vehicles?*

	Answer Choice	Response Percent	Response Total
1	Strongly agree	41.5%	798
2	Agree	24.8%	478
3	Neither agree nor disagree	17.2%	332
4	Disagree	8.1%	155
5	Strongly disagree	8.4%	162
	answered	1925	
	skipped	0	



The responses to Question 9 suggest that a scrappage scheme would be well received. However, responses to Question 13: *Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?* shows there are some concerns with the scrappage scheme proposed in policy TR2. The concerns relate to the proposed incentive – primarily that it is not enough to incentivise people to scrap an old polluting vehicle. There were additional concerns about the embedded carbon in existing vehicles and the relatively low miles that many cars do in Jersey:

*"The embedded energy in old cars is a large amount of carbon. There should be no early scrappage. Electric cars will replace fossil cars eventually without government intervention"*

*"My ICE vehicle is currently 14-years old and only done 30,000 miles... It is an extremely wasteful exercise to go and purchase a new EV with all the associated carbon to build it in preference to continuing with my ICE vehicle with the minimal mileage I do per annum."*

### Social media comments

The scrappage scheme generated many comments across all social media channels. The consensus being that the amount on offer was far too low to incentivise people to scrap old, polluting vehicles.

*"Great idea. Cars worth <£500 are not only causing pollution but are a lot of the time dangerous and unsafe to drive."*

*"Most cars can be sold for more"*

### Summary

There seemed to be very little support for policy TR2: Vehicle scrappage incentive. The general feedback was that it was open to abuse. The main concerns were:

- £500 is not enough money to encourage people to scrap eligible vehicles
- the scheme does not set out how people will be prevented from buying another polluting car or small van even if they spend their green living credit on something else.

It was thought that a motor vehicle testing scheme like an MOT would be far more effective at removing the most polluting vehicles from the road.

## 5.8 TR3 - Supporting transition fuels

Policy TR3 – Supporting transition fuels proposes to subsidise the rate of fuel duty charged on second generation renewable diesel by 32ppl from 2023 until 2026. Members of the public sometimes call this diesel 'green diesel' or 'bio diesel'.





## Written submissions

There were 16 written submissions that included comment on policy TR3 – Supporting transition fuels.

Concerns were raised about the use of second generation renewable diesels (SGRD) – ranging from the emissions from use as well as the production and availability of such fuels. Jersey Electricity provided a detailed written submission explaining their concerns with this policy (the full submission can be read in [Appendix 12.24](#)).

*"Biofuels are still hydrocarbons. They produce CO<sub>2</sub> and other particulate matter when burnt resulting in tailpipe (or boiler flue) pollution that negatively impact air quality and health and still lead to wasted energy (thermal losses). Evidence suggests that SGRD vehicles can emit 10 times more nitrogen oxides than an equivalent petrol vehicle. Secondly, producing biofuels is extremely inefficient, in some cases using land from cleared forests and that may be better used for food production to feed local communities or used more efficiently for solar arrays to produce electricity..." – Jersey Electricity*

However, other written submissions referring to this policy were mostly positive, and it was felt that this could provide a very useful solution for larger and commercial vehicles.

*"Biofuels are welcomed as an alternative to traditional fossil fuels. ... The use of SGRD is a significant opportunity to reduce the carbon emissions associated with HGV use and is therefore an important element for the construction industry... The government should understand that diesel type powered vehicles and equipment will continue to be used when there are no electric alternatives. Where there are no EV alternatives extra-subsidised biofuels could be ringfenced for larger commercial vehicles. This would be like Red Diesel. This ensures this valuable resource isn't used up in the cars or small vans sector where there is an electric alternative...Any subsequent revisions to the subsidy should be made only to maintain parity with the cost of diesel/ fossil fuel. Reducing the subsidy without increasing the duty on fossil fuels will encourage a reversal of positive change...Supply of fossil fuel diesel to Jersey should cease by 2030" – Jersey Construction Council*

However, there was concern that the incentive would not encourage those who currently access red diesel to make the switch:

*"From an agricultural/large-scale commercial vehicles perspective, there are currently no electric tractors or vehicles within an affordable price range available... There needs to be a commercial affordability to SGRD and greater guarantee of maintained prices to ensure long-term adoption. Red diesel does not require fuel duty to be paid currently. As TR1 is phased out, is there potential for GoJ to implement an additional policy to incentivise commercial businesses that currently use red diesel to fully switch to SGRD with further subsidisation?" – Durrell Wildlife Conservation Trust*



Many felt that the subsidy should be implemented before 2023:

*"We believe there should be more in the policy to encourage commercial vehicles (light/ HGV) to make the switch to SGRD now rather than wait for electric/ hydrogen alternatives, to become available. ... We ask the implementation of the subsidy scheme is accelerated to come into effect in 2022... This is a quick win, the product is available from all four fuel distributors, consumers and businesses are already using the product but to increase uptake a subsidy is needed. The sooner the subsidy can come into effect the quicker diesel vehicles will make the transition."* – **Rubis Channel Islands**

32ppl was not considered enough to incentivise change as it would not bring about price parity with traditional diesel and therefore it was suggested that this be increased:

*"We welcome the 32ppl subsidy on second generation renewable diesel although feel it should be implemented immediately rather than 2023 and should be raised to make SGRD cheaper than conventional diesel. The current imput duty on diesel fuel is 56.5ppl..."* - **Jersey Chamber of Commerce**

*"...there will still be a price disparity to normal fossil fuel diesel is a further disincentive to switch to a more environmentally friendly option. Continuing to use an existing vehicle, but running it on biofuel, will be near to zero carbon, compared to a new electric vehicle that creates a large carbon footprint when it is manufactured, and causes substantial environmental impact from the mining of lithium, a relatively scarce resource globally. We would like to see, at a minimum, price parity on SGRD and fossil fuel diesel, and that such a policy continue beyond 2026. However, Jersey should consider the move to only supplying biofuel diesel instead of normal diesel..."* – **The Jersey National Park**

It was also felt that the policy does not go far enough as it is restricted to second generation renewable diesel. It was felt that consideration should be given to alternatives that can reduce fuel consumption and emissions from petrol vehicles.

### Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session have vans and other commercial vehicles. They were very receptive to policy TR3 as it was felt that the transition to electric vehicles was not commercially viable at this moment in time. Policy TR3 was seen as a positive step that could be implemented reasonably quickly but for businesses to swap to second generation renewable diesel it would need to be the same price – or cheaper initially so they could 'try it out' – than regular diesel. It was suggested that this policy should be bought in as soon as possible rather than waiting until 2023.

There were lots of questions asking why policy TR3 only applied to transport and second-generation renewable diesel rather than being broader and including HVO as a heating oil transitional fuel. This policy was considered useful for those with larger commercial vehicles. A suggestion was made multiple times that rather than Jersey looking to ban diesel vehicles it should be the fuel that is banned.



It was felt that vehicle production will cease with other countries banning fossil fuel engines so Jersey will benefit from that, but we could transition to second generation renewable diesel before that date if the price was right.

*"... the UK Government introduced the Renewable Transport Fuel Obligation (RTFO), as the main policy tool, with the aim of reducing greenhouse gas emissions (CHG) from road transport fuels. All fuels have had an obligation to contain a 'bio element' in the UK. Ethanol is blended with the Petrol and in Diesel, Fatty Acid Methyl Esters (FAME). The UK and many other countries mandate fuel suppliers to only sell fuels that contain a bio element of 10% Ethanol in Petrol and 7% FAME in Diesel. E10 (Petrol) and B7 (Diesel), relate to the % of biofuel contained within them. These fuels reduce the overall levels of CO<sub>2</sub> emissions as they use less fossil fuels. Like other countries Jersey can make an immediate start, with real and sustained reductions to carbon emissions by mandating E10 & B7..." - **AFT Fuels***

*"A Carbon reduction system] can be fitted to any fossil fuel vehicle be it car, van, truck, HG, as well as buses, agricultural vehicles and marine engines. Reducing public transport emissions without the large financial outlay on EV buses in the initial transition period... these units are interchangeable; the unit can be changed as the owner upgrades to their next affordable vehicle purchase. The end game would be that the owner eventually purchases an EV (electric vehicle) ... As the Government ban on imported fossil fuel vehicles comes into force (a fantastic ideas and one proposed by the Citizens Assembly) it will automatically create an island only vehicle purchase scenario. This will mean that the flow of vehicles will be part exchanged in a way that people will purchase a more desirable newer used vehicle..." - **Rabey's Group CI Limited***

## Survey responses

There was no specific question in the survey relating to policy TR3: Supporting transition fuels. However, 75 respondents shared views on other fuels and hybrid vehicles in response to Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*). 55 mentioned that they would like alternative fuels to be considered. Hydrogen as a future fuel was a popular with 29 people referring to it in their response.

*"Needs to accommodate other technologies such as hybrid cars and hydrogen technology..."*

*"I don't think EV's are the solution! Hydrogen needs looking into more!"*

16 respondents to Question 13 specifically mentioned 'biofuels or bio diesel' and nine others referred to green fuels but not specifically second generation biodiesels or bio-diesel/fuel. Comments were largely supportive of the use of alternative fuels. The survey did not specifically mention this policy so many respondents were unaware of it and consequentially made suggestions for its inclusion (or surprise that it was not included). There were suggestions to reduce the cost, or the fuel duty.

*"Bio fuel is an on Island cleaner alternative for diesel and petrol car's, depending on the cars age, it's a simple drop in alternative, yet the local gov tax is too high to make it affordable. I work in construction and would be conscious of the impact on the planet, electric is NOT ready as an alternative to diesel / petrol engine's, not a widespread solution now anyways, bio fuel is. why can't gov drop the tax on bio fuel, sell more bio fuel and get more tax income anyway?"*



In response to Question 13, two respondents disagreed with this policy and would not support the use of second generation renewable diesel:

*We need to not put too much emphasis on biodiesel fuels. Our current biodiesel is not as eco friendly as it may appear and while making a difference to our local emissions, it is not without problems as it contains palm oil and is still a processed fluid that generates its own carbon footprint.*

*"Use of renewable diesel should be the only diesel available this also means all diesel cars can be used till they're no longer road worthy"*

### Social media comments

This policy was well received over social media, with many Islanders who weren't familiar with the individual policies suggesting the use of transitional fuels in alignment with policy TR3.

*"So, give people with the money to buy a new car a subsidy, why not remove duty from eco fuels to help those who cannot afford to change their car?"*

*"How about the Government start by dropping the HIGH TAX on the green diesel to encourage people to make a start to reducing our carbon footprint? If the GREEN diesel was cheaper then I think the majority would move to using it, that's lots of vans, trucks and cars including government vehicles!... "*

### Summary

Most feedback for this policy was positive. However, the following key themes emerged:

- second generation renewable diesel needs to be same price or cheaper than regular diesel
- the proposed incentive would not encourage those who currently use red diesel to make the switch
- should demand outstrip supply then the subsidy and availability of second generation renewable diesel should be prioritised for larger, commercial vehicles over cars and small vans where suitable alternatives such as electric vehicles already exist
- the source obtained needs to meet ethical standards.

## 5.9 TR4 - Vehicle Emissions Duty incentive

### Written submissions

Policy TR4 – Vehicle Emissions Duty incentive was mainly regarded as an inevitability, but its usefulness in acting as a disincentive was questioned. There were a few concerns raised regarding the Just Transition and that this policy might bring about inequality. There was also concern that the policy might impact certain businesses which rely on vehicles that may fall into the higher categories. There were also questions around if there should be an annual or ongoing charge rather than just looking at



vehicle emissions duty at point of registration in Jersey. However, there was comment that the policy contained too little detail to be able to make informed comment:

*"Make petrol cars more expensive to buy so people will buy electric cars or bikes."* – **St Saviour School Eco Team**

*Imposing financial incentives to make the switch (to EVs) is a key part of greener road travel, and this policy will provide part of that incentive. It does need to be ensured that it is enough to make a difference but not so much that it will overly impact less well-off Islanders. Paired with the subsidy for EVs, this step will make that crucial financial incentive stronger.* – **Jersey Youth Parliament**

*We would certainly expect EV vehicles not to attract VED. Many average family cars currently fall into reasonably high VED bands so we must be careful not to adversely affect income inequality..."* – **Jersey Chamber of Commerce.**

*"Offset costs for people with disabilities - that isn't means tested for lowest income - like the disability transport benefit is now."* – **Disability Strategy Group**

*"The VED changes are welcomed. However, consultation is requested regarding the future VED for commercial vehicles."* – **Jersey Construction Council**

*"I would also request that under the TR4 section that these [classic] vehicles are exempt from Vehicle Emissions Duty"* – **Jersey Classic Vehicle Club**

*"Section TR4 of the TR proposes an increase in the vehicle emissions duty ('VED') on all domestic petrol and diesel vehicles each year until at least 2030. Currently, and in recognition of the importance to our transport heritage, there are special exemption provisions from VED for vehicles of over 25 years old, and we would advocate and request the continuance of these exemptions."* – **The Jersey Old Motor Club**

*"For carrying large payloads, the market wants me to use a diesel tipper truck (there simply isn't the choice available)...New and nearly new vehicles have systems to burn fuel more cleanly and reduce other pollutants. There is no encouragement to select these vehicles locally. Because I am a commercial user, I am likely to be targeted for paying for road use. I will have to pass this on to my customers."* – **[Redacted business 1]**

However, the policy does not address the impact of Vehicle Emissions Duty on businesses with commercial vehicles, particularly those where electric alternatives are currently available or economically viable. It was felt that this discriminated certain businesses, and the additional costs would be passed on to the end user.



## Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session could be directly impacted by policy TR4 as most have vans and other commercial vehicles. Concerns were raised that larger vehicles would be subjected to high Vehicles Emissions Duty. Due to the lack of availability of electric or alternative fuelled alternative vehicles it was felt that this charge would be unavoidable and there was concern that this would be a significant additional cost when replacing a commercial vehicle. There was also concern that Vehicles Emissions Duty might become an annually applied tax. As alternative vehicles may not be available it was felt that this was an unfair policy.

## Individual submissions responses

Individual submissions questioned the lack of fuel-duty for leisure boats and private aircrafts.

*"Boats (registered in France) refuel in Jersey because our fuel is cheaper. It's unfair that this carbon source is part of a target that Jersey citizens are going to have to meet as it has nothing to do with us. There must be a fuel duty on these boats... Private Aircraft; Jersey has many high-net-worth residents using private aircrafts; if they refuel in Jersey, the fuel is then part of our carbon output and therefore our collective target. How is a "Just Transition" balancing hundreds of tonnes (my estimate) of this fuel (where cost / additional taxation isn't an issue) against those in society who are already struggling financially?" – 910*

*"Can it be explained why cars appear to be targeted before boats, car fuel carries a significant duty, yet boat fuel is exempt. As boats are more a luxury item and not essential for most people's day to day working lives, unlike a car, why is boat fuel exempt?" – 909*

## Survey responses

There was no specific question in the survey relating to policy TR4 – Vehicle Emissions Duty incentive. However, 165 respondents shared views on legislation, tax, and the proposed date to prevent the import of petrol and diesel cars and small vans in response to Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*).

Many respondents were supportive of economic instruments that resulted in drivers of fossil-fuelled vehicles paying more. Suggestions ranged from increasing fuel duty, charging per mile driven, fining people with idling engines, a road tax and utilising vehicle emissions duty.

*"I believe the polluter should pay - not be given a greater incentive than those who drive less polluting vehicles. Higher road tax or parking charges should be introduced for the more polluting vehicles..."*

*"Tax 4x4s over a certain price. Big cars take more toll on roads, meaning more damage, more pollution. There's little need for them and should be taxed."*



In response to Question 8 (*What else would make you more likely to switch to an electric vehicle when you next change your car?*), there were 90 comments relating to introducing economic levers, and 21 comments relating to tax. Although most comments on tax were referring to it as an economic instrument to encourage people to move to an electric vehicle, there were also comments relating to disincentivising fossil fuel vehicle ownership.

*"Extra charges or taxes should be levied on import; this would mean they are paid by those that can afford 'new vehicle buyers' and reduce administration costs on collection and the associated carbon cost."*

*"Tax car based on engine size and emissions."*

*"Removal of GST and import taxes from electric vehicles to make them more affordable, including removing GST from used EV's..."*

*"Bring in an annual VED, and gradually ramp up the cost. Or charge a tax based on emissions when cars are transferred. Bring in an emissions related parking charge for town, to make it more expensive to commute in large petrol or diesel cars. We need to be a lot more ambitious and creative in the range of measures we implement!"*

## Social media comments

There were seven comments on social media relating to policy TR4.

*"Jersey doesn't need large vehicles no one living in Jersey needs a big powerful fast car put a massive tax on them!..."*

## Summary

There were concerns about the impact this policy could have on commercial vehicles where there are no electric (or other fuel) alternatives at this time. There was also concern about the impact this policy might have on the Just Transition. It was widely felt that the policy contained too little information to allow informed, constructive feedback.

## 5.10 TR5 - End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030

### Written submissions

There was general agreement for policy TR5 - End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030. However, the policy needs to be more explicit that the 2030 date relates to cars and small vans rather than all fossil-fuelled vehicles.

There was a consensus that the date was correct but that certain exemptions should be included in the policy. Noticeably these were for historic and collectable vehicles.





*"...Wonderful old vehicles, which are an important part of our Island's history, are fuelled by petrol/diesel. Just a few of them that are on display in our museum go 'on the road' for a run only occasionally and for short periods of time - it would be very sad if they merely became static displays. There are also many privately owned such vehicles on the Island and the various local Motoring Clubs have many enthusiastic members."* –

**Pallo Steam Motor and General Museum**

*"...A mileage restriction could be imposed on these imported vehicles as they are used mostly for club events or public displays. Several of the Islands wealthy residents have collections of vehicles, these range from vintage, classic and modern-day supercars. These cars are regarded as an investment, so surely it would be prudent to have a policy whereby future wealthy persons applying to move to Jersey after 2030 would be able to bring their vehicles with them..."* – **Jersey Classic Vehicle Club**

*"Section TR5 of the TR records the end to the importation and registration of petrol and diesel vehicles that are new to the Island from 2030, which if adopted in its suggested form would mean that no Historic Vehicles could be imported to the Island after that date... Historic Vehicles are an important part of our heritage and the carbon footprint of the average historic vehicle is very low; in the U.K., for example, research has shown that the historic vehicle community accounts for less than 0.25% of the total miles travelled on UK roads annually"* – **The Jersey Old Motor Club**

However, there was also a suggestion that there needs to be more done to ensure that this policy will not inadvertently disadvantage Islanders with disabilities.

*"Where car or vehicle ownership is needed to maintain disabled Islander quality of life that this should not just be borne by the individual. Without accessibility consideration it becomes a policy of raised prices that disable someone who does not have a proper alternative - rather than 'I'd just prefer not to take the bus'"* – **Disability**

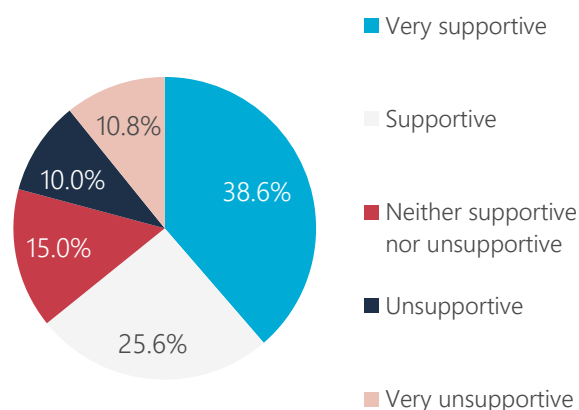
**Strategy Group**

## Survey responses

Survey Question 12: *In Jersey, a car often has a useful life for over 15 years. To meet our targets, we need to stop petrol and diesel vehicles coming into the Island well in advance of 2050. The manufacture and sale of petrol and diesel vehicles will be banned by the UK from 2030 and the EU from 2035. Car manufacturers know these dates and are increasingly switching to produce more electric vehicles. The draft Carbon Neutral Roadmap suggests that the importation, registration and sale of most petrol and diesel cars and small vans will end in 2030. How supportive are you of this move?*



	Answer Choice	Response Percent	Response Total
1	Very supportive	38.6%	744
2	Supportive	25.6%	492
3	Neither supportive nor unsupportive	15.0%	288
4	Unsupportive	10.0%	193
5	Very unsupportive	10.8%	208
	answered		1925
	skipped		0



All survey participants answered this question. 64% were either supportive or very supportive whereas 20.8% were either unsupportive or very unsupportive. There were 66 comments relating to the date in the responses provided for Question 13 - *Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*

48 felt the 2030 date was too far away:

*"2025, not 2030. the faster the better"*

1 agreed with the 2030 date:

*"I would accept a 2030 ban on new petrol and diesel vehicles being imported"*

9 felt the date was too soon:

*"The timeframe for change is too quick. I agree that polluting vehicles need to be changed at some point but stopping the sale of them in 8 years' time is too soon for our Island. Garages will go out of business and jobs will be lost, as the skills needed to 'fuel' and service electric cars is far too low on Island at present. 8 years is not long enough for skills gap to be improved sufficiently, garage conversions and businesses to adapt."*

A further 8 respondents disagreed with ending the importation and registration of petrol and diesel vehicles at all:

*"I think it is deeply problematic to have a blanket ban on the importation, registration and sale of most petrol and diesel cars. By all means incentivise electric vehicle ownership, the market is heading that way anyway, but to have a blanket ban is draconian..."*



The issue of classic cars, motorbikes and racing cars came up many times. It is apparent there is a real demand for an exemption to be made for these vehicles. This was raised by 29 times in response to Question 13, and again in responses to other questions:

*"There should be an exemption for classic and vintage cars."*

*"Imports for investment/enthusiast purposes should be allowed, but in a controlled manner. For example, requiring a licence which carries tax penalties or mileage limits to deter large uptakes. In reality 99% of Islanders will naturally move to EV vehicles due to the fact that most manufacturers will only have a EV range after 2030, therefore the small number of ICE vehicles for collector/ enthusiast purposes will have minimal impact."*

There were suggestions from some of those who wish to see an exemption that there should be a cost imposed on collectors:

*"There needs to be a carve out for classic cars/vehicles. Usage per mile charge therefore user pays or in this case polluter pays"*

## Social media comments

There were four comments on social media relating to policy TR5.

*"Just let the cars change at their own speed no more will be made or registered after 2030, so they will naturally change from around 2025 onwards, does not need money throwing at it. If the States have money to spare, look at providing renewable energy sources, perhaps small wind and or solar panels on every house?"*

## Summary

It was accepted that this policy is necessary. But questions were raised regarding the 2030 date proposed in policy TR5. Some Islanders felt it was too soon, some too late and others just right. Further clarity is needed on the types of vehicles included at each date of the ban as there appeared to be confusion and misunderstanding that 2030 was the date for cars and small vans rather than for all vehicles.

Many respondents would like to see consideration for an exemption added to the policy for historic and collectable vehicles (including motorbikes). There was a similar call for exemptions for commercial vehicles where currently there are no suitable alternatives.

## 5.11 TR6 - Roads Law Review

### Written submissions

There were not many written submissions that considered policy TR6 – Road Law Review.



*"Any review of the Roads Law should form part of broader review that looks at making our legal framework on road safety fit for purpose." – Cycle4Jersey*

*"The law is not the only problem - dangerous drivers and their attitudes to bikes and other methods of transport also need to be changed. The law could also be changed to give greater priority to buses over cars, in conjunction with the great changes to the highway code to come into force soon." – Jersey Youth Parliament*

## Survey responses

There was no specific question in the survey relating to policy TR6 – Roads Law Review. It was not a topic that many people chose to comment on in response to Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*). However, people did comment on micro-mobility. 12 respondents specifically referring to legalising the use of electric scooters, with suggestions with suggestions around licencing and insurance of micro-mobility modes of transport.

*"Make electric scooters legal, set a speed limit and make helmets compulsory. Set a maximum speed limit of 10mph for shared pavements for electric bikes, pedestrians etc."*

*"...I welcome the new Highway Code and believe a review of speed limits in county lanes etc would be appropriate..."*

*"Make the roads safer and get more people on bikes!!!"*

## Social media comments

There were only two comments on social media relating to policy TR6. However, the issue of road safety was raised. People perceive Jersey's current system to be unsafe so it appears that a Road Safety Law review would be well received.

*"...More people would walk to work if they felt safer. The streetlights in Jersey are a joke. Dangerous to be true. Trinity hill. Is pitch black. One streetlight for years has not worked. You are forced to walk in the road due to lack of light and fear of tripping. Same as St Martins road. 40mph road. No lights to protect nor feel safe."*

*The zebra crossings on St Saviours Hill. So badly lit you can't see people wanting to cross and 5 oaks. Better off protecting the public wanting to walk to work and children walking to school or out enjoying themselves..."*

## Summary

Consultation responses to policy TR6 – Road Law Review called for roads to be made safer for pedestrians and cyclists. Micro-mobility modes of transport (including electric scooters) had very mixed responses with some calling for them to be legalised (and potentially licenced) as a matter of priority and others regarding them as a menace and something that should remain illegal with the law being strongly enforced.



## 5.12 TR7 - "Green" number plates for electric vehicles

### Written submissions

Policy TR7 – "Green" number plates for electric vehicles was not generally well received in the written submissions.

*"The Trust would question the value of this initiative in terms of seeking to positively engage and encourage all sectors of society to be part of the Island's journey towards carbon neutrality." – The National Trust for Jersey*

However, others suggested that the policy has potential to bring about behaviour change.

*"Green number plates could be seen a discriminatory to those unable to afford the change to an electric vehicle. The incentive should be expanded to those motorists using SGRD biofuels, which would be all diesel vehicles..." – The Jersey National Park*

*"This is a positive step in making the cultural shift that is needed but could go further in the colour spectrum. Why not 'amber', 'brown' or 'black' number plates based on emissions/weight (but exempting commercial vehicles on availability grounds)?..." – Sunworks*

### Individual submissions responses

Individual submission 903 ([Appendix 13.3](#)) questions the impact that policy TR7 would have.

*"Surely just green number plates are insufficient. We are trying to change culture here and we need to play the guilt card and in conjunction with MOT introduction, every vehicle by Law needs to display an official number plate/sticker/badge which charts its degree of greenness and starts at black. We will know we have got there when children beg their parents not to take them to school in the 'embarrassing' Grey number plated Range Rover ("please can we go in the Zoe or walk!!"). This action point ought not to stop after 2022 – it needs more thought than that." – 903*

### Survey responses

There was no specific question in the survey relating to policy TR7 – "Green" number plates for electric vehicles. It was a topic that only three respondents commented on in the free text for Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*). All 3 responses regarded the proposed policy negatively, suggesting it was tokenistic and dividing. There were also comments suggesting this policy would not support a 'Just Transition' as those on lower incomes were less likely to be early adopters of electric vehicles and would therefore be made to stand out by this policy.

*"TR7 - are there practical implications surrounding having a "green signifier" on EVs or is this purely aesthetic and geared towards "othering" people who don't (can't afford to) drive EVs?"*



## Summary

Policy TR7 – “Green” number plates for electric vehicles was not popular and was generally regarded as tokenistic and virtue signalling. There were some respondents that supported the concept and could see the potential to link it with other initiatives, for example electric vehicle parking incentives. Some called for the concept to be taken further, for example heavily polluting vehicles to have a black registration plate.

## 5.13 TR8 - Sustainable Transport Roadmap

### Written submissions

Written submissions in response to policy TR8 - Sustainable Transport Roadmap had a few pertinent themes. It was largely felt that without the full Sustainable Transport Policy, due to be published later in 2022, it was impossible to comment on policy TR8.

*“...until the STP [Sustainable Transport Policy] is published, it is impossible to assess just how the Government will achieve this and how far a new Government will also embrace this policy”. – Jersey Motor Trades Federation*

Infrastructure was a key issue for the success for sustainable transport with cycling routes and bike parking as well as review of the bus service as being seen as vital in the transition to change how people choose to travel around Jersey.

The other main theme that emerged considered how the Sustainable Transport Roadmap was going to be funded.

*“... With the Sustainable Transport Roadmap still unpublished, and no long-term funding in place for actions such as expanding Jersey’s public transport and active travel infrastructure, the CNR [draft Carbon Neutral Roadmap] appears to allocate a disproportionate importance to decarbonising the vehicle fleet. As employers and businesses, however, our members would like to see much greater clarity on future policies that affect their operations and would (for example) enable their staff to switch their commuting habits. Early clarity on sustainable transport would allow our members to develop resilient work travel plans that keep the objectives of carbon neutrality in reach, by harnessing the collective efforts of an industry that employs a very significant share of the Island’s workforce.” – Jersey Finance Limited*

The Disability Strategic Group reminded of the importance of considering the needs of all disabled Islanders when developing the Sustainable Transport Roadmap.

*“This also needs to have a separate plan for people with disabilities as they are disproportionately impacted... We must consider that people also have different needs and to ensure that ‘must haves’ for people with disabilities are not automatically excluded or raised in costs without some rebalancing to ensure that the policies do not have the impact of lowering quality of life in ways that non disabled people do not have to.” – Disability Steering Group*



## Individual submissions responses

Individual submission 903 ([Appendix 13.3](#)) suggested that policy TR8 needed to give more emphasis on term-time traffic:

*"Disappointed there is nothing about schools' traffic. The lack of stationary polluting traffic is so clear during holidays that this area needs radical (and of course unpopular) policies e.g., park & ride enforced by making roads 'pedestrian only' or 'one way' (I believe we have employed a traffic expert recently), around the main school area and staggering school opening times." - 903*

Individual submission from 905 ([Appendix 13.5](#)) wrote in support for personal micro-mobility modes of transport:

*"In the Jersey '2019 Framework for Sustainable Transport' it states 'pilot the safe use of personal light electric vehicles' will be supported. This I believe needs to be promoted. We are in a great position to push people towards personal electric devices; sized proportionately to the task in hand - e-bikes, e-scooters etc. Therefore, reducing the amount of vehicles on the roads. For instance, if e-scooters were legalised and then allowed onto the buses people could use a scooter to get to a bus stop and then equally use their scooter at the other end of the bus journey." - 905*

## Survey responses

There was no specific question in the survey relating to policy TR8 – Sustainable Transport Roadmap. However, Sustainable Transport was a topic that elicited many responses. 573 comments were made regarding sustainable transport in response to Question 13 (*Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*). There were 235 comments were made relating to buses and 182 relating to active travel. In addition to this there were many references to sustainable transport in response to Question 20 (*Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?*) and Question 21 (*Do you have any other comments on the draft Carbon Neutral Roadmap?*).

Encouraging sustainable transport was as extremely popular suggestion. Many respondents were keen to priorities investing in cycling, walking and the bus network over incentivising the uptake of electric vehicles for example:

*"Manufacture of cars is hugely damaging to the environment. Please encourage cycling, walking, public transport (free busses for all) etc."*

There were also 24 comments calling to encourage car clubs or rental schemes, or car sharing to move away from private car ownership:

*"I would prefer a greater emphasis on car sharing rather than ownership. Perhaps competition in the EV market is needed to increase the number of vehicles available to the public..."*





*"Please provide more incentives for walking, cycling, car share and bus use."*

Further comments on buses and active travel are covered in response to policy TR9 - Bus service development trials and policy TR10 - Active travel.

### Social media comments

Sustainable transport did come up in some social media comments. With buses, better walking and cycling infrastructure and being identified as initiatives that could help Islanders to move away from using private cars for every journey:

*"Surely it would be better to use that money to subsidise a more suitable bus service? Or a really good park and ride system with a base in each parish? After all, the cars are only polluting when they are being driven. Has there ever been a really thorough analysis of where people work (or go to school) in relation to where they live? Because with a small and finite area to analyse that is something that could be done."*

### Summary

Without the published Sustainable Transport Policy many were unable to comment on policy TR8 - Sustainable Transport Roadmap. The importance of the Sustainable Transport Policy was well recognised and something that Islanders were very keen to see. Consulting people on the Sustainable Transport Policy was seen as very important. Sustainable transport was seen by many as one of the main tools to enable Jersey to meet its net-zero ambition, but it was recognised that there would be a demand for considerable investment in infrastructure including cycling routes, the bus service and active travel. It was also accepted that people would need to be 'disincentivised' from using private vehicles, especially cars.

The importance of Principle 5 of the Carbon Neutral Strategy that commits to a Just Transition was considered to be of significant importance in further developing this policy. Responses to some aspects of this policy are detailed more in response to policies TR6 – Road Law Review; TR9 – Bus service development trials; and TR10 – Active travel.

## 5.14 TR9 - Bus service development trials

Policy TR9 - Bus service development trials sets out a commitment to implement a programme of bus service development trials in the 2022-24 delivery plan. These trials will be informed by work on the Bus Service Development Plan, which is required by the Sustainable Transport Policy.

The policy states that the trials could include:

- increased frequency services on some routes
- changes to pricing and/or ticketing
- promotion of bus use within workplace travel plans



- exploration of demand responsive service options
- use of low-carbon energy solutions.

The consultation into the draft Carbon Neutral Roadmap looks to understand Islanders views on this policy including the suggested trials.

### Written submissions

As with policy TR8, the main feedback on policy TR9 - Bus service development trials were that although the policy was welcomed, it was felt that there was a lack of information about the trials making it difficult to review:

*"Jersey Business welcomes the bus service development trials and is supportive of the desire for a sustainable transport strategy, including an increase in bus services across the Island." – Jersey Business*

The National Trust for Jersey mentioned the importance of including recreational and leisure journey within the trials and suggested that further information was needed to make informed changes to the bus service:

*"Little consideration has been given to recreational/leisure journeys and how this might be actively addressed"*  
– **The National Trust for Jersey**

School travel was also mentioned in written submissions from two schools and the Jersey Youth Parliament (full submissions can be read in [Appendix 12](#)):

*"To reduce our carbon footprint we should get the school bus and walk or bike to school. If people live too far out and the bus doesn't go down that route, I think we should change the school buses routes so that everyone has the chance to get the bus, bike"* – **Le Rocquier School**

*"Have minibuses to take primary school children to school so parents don't have to drive."* – **St Saviour School Eco Team**

*"Developing the bus service... is key. Transforming service, pricing, and other matters will all encourage the increased usage of the bus. As the majority of people don't currently take the bus, the bus service needs to change to help serve them more."* – **Jersey Youth Parliament**

### Survey responses

As mentioned in the section on policy TR8 - Sustainable Transport Roadmap. There were many comments in the survey relating to buses. Question 13 alone had 235 comments regarding buses, Question 8 had 9, Question 20 had 32 and Question 21 had 30. The comments made generally support the trials proposed in policy TR9. For example, suggestions how to increase bus ridership; suggested improvements to routes and frequency of buses (including smaller hopper services); and calls for buses



to be fuelled alternatively (electric or second-generation renewable diesel). Most of these comments relate to the bus development trials proposed in policy TR9.

### Increased frequency services on some routes

The comments made in the survey were very supportive of improvements to the bus service in terms of increasing bus frequency and improving services on some routes.

*"Bus routes and frequency need improvement."*

*"Make bus routes run more often up the main arteries up the Island i.e., Trinity Hill and Queens Road, 1 bus every hour is not regular enough."*

There were also practical suggestions for some routes to increase ridership on certain routes:

*"Make the buses so much better, I would barely drive if the buses were more frequent, but they are so infrequent it's very hard. Ideally being able to turn up at the bus stop and only have to wait 10/15 minutes before the next one comes..."*

*"Buses will have to be adapted to take surfboards, kayaks and paddle boards to the beach..."*

### Changes to pricing and/or ticketing

Responses showed changing to ticketing structure and /or pricing would be received positively by most Islanders. It was accepted that this would need investment. That suggests that this part of policy TR9 was well accepted.

*"I think rather than incentivising private transport there should be more investment in public transport, park and ride, more buses..."*

### Promotion of bus use within workplace travel plans

Responses to this issue in the survey were negligible. Comments relating to workplace travel tended to focus on:

- supporting homeworking to reduce the need for travel
- improving showering, changing, and drying facilities for those using active travel
- flexibility to work around peak travel times and fitting with bus times.

*"...[make] transfer tickets more flexible so that if you have to get multiple buses it's easier"*

*"Make buses free!"*



### Exploration of demand responsive service options

Hopper buses, park and ride schemes, circular bus routes, shuttle buses were all regarded positively by survey respondents. This suggests that this proposed trail in policy TR9 would be well received.

*"We need a fantastic bus service with smaller buses that shouldn't cost more than 50p a trip. Offer 17 years old a yearly bus pass if they don't drive... Ring n Ride minibuses should be used in Parishes and around Town..."*

### Use of low-carbon energy solutions

Many respondents expressed a wish to see alternative low-carbon fuels for the bus fleet. Using second generation renewable biodiesel or switching to electric buses were the most popular suggestions. However, hydrogen buses were thought to be the way forward for many respondents.

*"Electric taxis and buses needed ASAP."*

*"Large review of Bus and public transport service. Complete overhaul of routes, scrap timetables, change to frequent parish hopper shuttle services linking into frequent main route services. No timetable needed because of frequency..."*

*"I think more should be done to investigate the possibility of electrification of our most polluting vehicles (diesel buses and lorries)."*

*"The buses should run more frequently. The buses should be electric, or hydrogen powered."*

### Social media comments

There were some practical comments on social media relating to policy TR9. This suggests that Islanders would like to see bus development trials.

*"Easy option - round shuttle for 50-year-olds and older in a small electric 18-seater mini buses - free to ride - shopping and general travel - seen it done in Turkey and keeps the older public moving outside the car - easy low level mini electric buses - stop and pick up"*

*"Subsidise and improve the bus service. It is cheaper and easier to drive to Town and park for an hour. Let alone a family trip to Greve de Lecq for example, especially if you don't live in Town."*

*"Terminate the major artery bus services b4 they get clogged up in town e.g., the Trinity hill bus could turn left at Robin Hood (which becomes last stop) enter RHS lane and then heads back north. On certain services or by appointment entitled bus users could be shuttled by small electrical vehicle to LibStat and other users would walk. Other main artery routes (e.g., Queens Road) to have similar arrangements. This would increase frequency of service without additional expenditure, not require new roads or bus stops and reduce congestion around town. Also give all bus stops a proper shelter and thus be safe to wait at."*



## Summary

Bus trials were welcomed and well received. More clarity on what the trials should be and how they will be implemented is necessary for people to pass full comment. School buses were seen as a key issue. There were also lots of responses suggesting smaller buses would be useful providing a 'hopper' style service to some parts of the Island. Transitioning the buses away from diesel was also seen as incredibly important. There were lots of suggestions for different trials which supports the belief that this policy was received positively.

## 5.15 TR10 - Active travel

This proposed policy says that the Government of Jersey will implement further active travel initiatives in 2022, ahead of development of the full Sustainable Transport Roadmap. An Active Travel Plan is being developed as required by the Sustainable Transport Policy and will be published in 2022. That Plan will provide a blueprint for the Island's future active travel network and associated policies and investment.

### Written submissions

As with policies TR8 and TR9, responses to TR10 – Active Travel suggest it was difficult to comment on the policy, as the full Sustainable Transport Policy has yet to be published. However, active travel was seen as an important part of decarbonising Jersey. Cycling infrastructure was seen as the most important thing in getting more people to travel by bike (pedal or electric). Also, infrastructure needs to include secure bike parking and support for businesses to encourage their staff to change how they commute.

*"For students who have bikes but don't have a bike lock possibly school could provide students with bike lock..."*  
**– Le Rocquier School**

*"The Trust welcomes the ambition, but it should be acknowledged that cycle travel will only be more widely adopted if safe cycle routes are provided. This requires significant investment as well as over-riding commitment to deliver projects for the benefit of the majority even if this requires statutory intervention..."*  
**The National Trust for Jersey**

*"We would like a lot more cycle routes with trees to block out the rain so we can cycle when it's wet. Trees will also absorb carbon. We want people to have help to buy electric bikes and scooters, not just cars. There are too many cars on the road already and it makes it hard for us to ride to school..."* **– St Saviour School Eco Team**

The associated benefits from active travel were also seen as important:

*"Try and encourage more people to walk and maybe they could build up tokens on their apps and could put these tokens towards purchasing an electric car"* **– Beaulieu Primary School Eco Team**



*"...increasing active travel such as walking or cycling, and reviewing roads laws to ensure safe, low-carbon travel – have potential benefits for population health. It is well-established, for example, that encouraging physical activity through active travel is linked to preventive health benefits, including a reduced risk from diabetes, obesity, cardiovascular diseases, strokes, and cancers. It has also been shown to help improve mental health and general wellbeing. Transport policies may also benefit population health by reducing air pollution, which is associated with a greater risk of heart and lung diseases." – **Public Health, Government of Jersey***

However, active travel does come with some issues, particularly when it comes to shared spaces for pedestrians and cyclists:

*"Active travel plan largely presumes everyone can walk or cycle or that hybrid electric bikes can be used by everyone. You must make sure active travel is accessible for the large number of PWD [people with disabilities] who rely on cars – about 14,000 [people] have a disability in Jersey. Training from strategy groups on putting in extra safety features on crossings of cycle lanes etc as people with disabilities in Jersey are reporting issues with safety and cyclists." – **Disability Strategy Group***

## Survey responses

Cycling and cycling infrastructure were seen as hugely positive alternatives for most respondents to the consultation survey. This suggests there is strong support for policy TR10 – Active travel. Responses to the survey recognised that not everyone can cycle and that the plan needs to account for those who cannot.

There were positive comments regarding previous electric bike grants and the need for further schemes. There were also calls for support for those who may wish to own a traditional bicycle. The associated health benefits associated with active travel were seen very positively too:

*"I also support eBikes – I own one myself – but these also need to come down in price to encourage more people like myself with ailments such as arthritis to use them. This should also include tricycles, which would be great for the elderly. Also, need to cut down on the amount of traffic and/or create more cycle lanes for safety."*

*"...Cars have caused obesity, using the commute to exercise will increase everyone's mental health...A physically and mentally well society will lead to a happy, successful, creative productive community..."*

Many respondents called for more and improved cycle lanes but there were also suggestions for increased secure bike parking and the need for places of work to have showers and changing facilities as well as drying rooms. Similarly, there were comments that suggest bike ownership can be difficult for those living in flats where there may not be suitable spaces to park bikes securely.

*"Invest in indoor cycle shelters and lockers for people to get changed and store cycling clothes whilst in town."*



*"More bike storage that can be rented out would be helpful. As many people in St Helier live in very small apartments there is often no room to store a bike or it is difficult to get a bike up many flights of stairs. If there were bike stores installed in each street people could rent space for their bike from the States."*

In a similar vein, walking was seen to be a potential solution to replace short car journeys. Walking to school was mentioned several times. There was an underlying theme that children should be able to walk to school and not need to be driven. It was widely felt that school related car journeys were the cause of a great deal of the congestion problems in Jersey's roads:

*"Too much traffic travels to the schools in the Wellington Road area. Make these schools accessible from town. So many parents drive their children to school then park in town, why??"*

### Social media comments

174 people (72%) who took part in an Instagram poll agreed that better cycling infrastructure should take priority over encouraging people to buy electric vehicles.

There were not many social media comments addressing active travel. Those comments on active travel were generally linked to road safety and to school traffic. However, commenters would like to see better cycling infrastructure and felt that this would move people away from cars. There were also comments relating to park and ride schemes and other initiatives that would encourage Islanders to move away from travelling by car:

*"What's the point of going on about changing the fuel we use in our cars etc. more people would walk to work if they felt safer. The streetlights in Jersey are a joke. Dangerous to be true."*

*"The zebra crossings on St Saviours hill. So badly lite you can't see people wanting to cross and 5 oaks. Better off protecting the public wanting to walk to work and children walking to school or out enjoying themselves wasting your money on this paper or the white elephant hospital which has so far lined consultation construction firms' pockets"*

### Summary

The idea to improve active travel was extremely well received. Cycling appears to be seen as a great solution for many Islanders, but it is important to consider and consult with people with disabilities as the policy progresses. A lack of infrastructure was the main barrier to adopting active travel choices. This included the need for more cycle routes but also included the need for suitable storage for bikes, especially for those living in flats. With regards to the Just Transition it was important to consider incentives for those on lower incomes to ensure accessibility to bikes and electric bikes and to things like bike locks, lights, and helmets etc.





## 5.16 TR11 - Emissions from aviation and maritime transport

### Written submissions

Written submissions regarding policy TR11 – Emissions from aviation and maritime transport included support from Ports of Jersey:

*"We fully support the adoption of the Jet Zero framework approach confirming the Island's ambition to reduce emissions, aligning with the position in the UK, our largest market for air traffic... Regarding maritime transport, we support the Carbon Neutral Roadmap approach seeking compliance with the International Maritime Organisation's pollution prevention treaty, MARPOL... Ports of Jersey is fully supportive of the draft policy framework for Emissions from aviation and maritime transport. It provides a clear and demonstrable roadmap framework to decarbonise an important part of our economy" – Ports of Jersey*

*"We have access to Sustainable Aviation Fuel and are readily able to supply this on Island... We have also been supplying SGRD into commercial vessels, we are soon to start trials in the pleasure craft market..." – Rubis Channel Islands*

Written submissions also referenced the COVID-19 pandemic and the impact on business travel – primarily flights. It was felt that the pandemic had led to a different way of working for some industries and that behaviours were changed and that these changes should become business as usual.

*"All industries should review the past two years and actively discourage business travel where digital alternatives are suitable. The government is encouraged to use fiscal levers to maintain this change." – Jersey Construction Council*

Importing and exporting of goods and services rely on aviation and maritime travel and this policy has the potential to impact how this continues in the future, especially if there are unexpected costs associated with addressing maritime and aviation emissions.

*"Jersey Business welcomes the proposal that the Government will work with Ports of Jersey to reduce emissions from aviation and marine transport. In these discussions, consideration must be given to creating a long-term strategy that secures reliable services from as many ports, including French ports, are viable, whilst minimizing ongoing and unexpected increases in freight costs" – Jersey Business*

*"...Jersey carbon emissions are principally calculated on fuel sold from Jersey outlets. How are we measuring French pleasure boats refuelling in Jersey (because the fuel is cheaper)? It seems unfair that this carbon source is part of a target that Jersey citizens are going to have to meet & it's nothing to do with us" – Jersey Chamber of Commerce*

### Survey responses

There was no specific question in the survey relating to policy TR11 - Emissions from aviation and maritime transport. The issue of emissions from marine and aviation transport was raised 23 times in



responses to Question 20 and 30 times in responses to Question 13. There were three main themes that stood out from the comments:

Fuel duty should be implemented for leisure boats and private aircrafts, with the feedback suggesting that the fuel should be subjected to a higher rate of tax.

*"...Boat owners (a hobby) should pay considerably more than drivers for fuel as opposed to the disgusting situation where they pay about 50ppl less than drivers."*

*"TR11: There should be duties on private planes and boats (including French boats who refuel in Jersey because it's cheaper)"*

*"Put a huge tax on Islanders using private jets. The richest 10% are responsible for 70% of carbon emissions through their wasteful lifestyle yet we are pandering to their needs and encouraging billionaires to invest and live here."*

**Passenger and freight travel on and off Jersey** - the need to be able to travel on and off Island was extremely important for people but also to transport goods and services to and from Jersey. This included comments reducing the amount of imported foods by producing more on Island (comments relating to the import of food are picked up in policy OE3 – Agricultural sector emissions). When considering passenger and freight travel, respondents commented that commercial aviation and shipping companies should to more to reduce their own emissions until such a time with alternative energy sources become commercially viable. This included more options to travel by sea as the ferry was considered more expensive than flights, so Islanders were more inclined to fly. Respondents also requested more education so that they can make better choices about how they travel.

*"Introducing more option to travel by sea rather than air."*

*"Shipping and transport companies must be forced to reduce their emissions. This could mean using more modern vessels/aircraft with lower emissions and larger, less frequent voyages."*

*"Make the ferry a cheaper option than flying"*

*"Transport in island is key as we have no alternative to travel to and from island with fossil burning fuels in the foreseeable future so we need optics to the outside world that we're doing all we can to offset in this area immediately."*



**Education** – the need to understand travel choices and their impacts upon the environment was a theme that came through in the survey.

*"Clear publicly available information about the carbon consequences of their travel choices. What's best for travel to England: overnight ferry + train to Waterloo, jet to Gatwick + train to Victoria or turbo prop to Southampton + train to Waterloo? The govt should provide this information even if it might upset the travel providers"*

## Social media comments

There were only two comments on social media regarding policy TR11.

*"All the while private jets flying into the island will be allowed the fuels we can't use? Hypocrites."*

## Summary

It is important that travel to and from Jersey is maintained. The policy was well received but more needs to be done regarding emissions from private / leisure jets and boats, including removing access to 'red diesel'. The price of maritime fuel in Jersey was regarded as too low and because of that, boats from other jurisdictions were electing to fill up in Jersey therefore contributing to more emissions associated with that sector in the greenhouse gas inventory.

It was widely felt that those who fly the most should pay for the privilege to disincentivise frequent flyers. It was widely accepted that Jersey would have little control over the aviation and maritime sectors moving towards sustainable fuel options, but such a move will have a significant impact on emissions from that sector. For the public it was felt that there was currently a lack of information around sustainable travel choices and that would help Islanders to understand their impact.

## 5.17 HT0: Heating policies

Most of Jersey's on-Island emissions are generated when we drive petrol and diesel vehicles and from the boilers that heat our buildings. A key priority policy is therefore accelerating the switch from fossil fuel to low-carbon property heating. The heating emissions reduction policies in the draft Carbon Neutral Roadmap set out the plan for how we will make the move to low-carbon heating.

As well as written submissions from individual organisations there were some written submissions made by industry bodies on the heating policies. All written submissions are in [Appendix 12](#) where they are listed in alphabetical order:

- The Association of Jersey Architects submission ([Appendix 12.4](#))
- Jersey Chamber of Commerce heating submission ([Appendix 12.20](#))
- Jersey Construction Council heating submission ([Appendix 12.23](#))
- Jersey Business heating submission ([Appendix 12.19](#)).



## 5.18 HT1 - Supporting low carbon heating systems and home insulation

Policy HT1 - Supporting low carbon heating systems and home insulation proposes that the Government of Jersey will provide a subsidy to enable both householders and commercial businesses to transition to low carbon heating systems. The scheme will run from 2022 until 2025. Policy HT1 is split into two separate but related schemes – a domestic incentive and a commercial incentive to switch away from fossil fuels. Recognising that running costs to the householder may be increased, energy efficiency measures will also be eligible for funding under the domestic scheme.

### Written submissions

The need for the policy is widely accepted but the written submissions generally conclude that the policy HT1 – supporting low-carbon heating systems and home insulation is inadequate. The policy proposes the incentive for 998 boiler replacements but recognises that there are approximately 21,559 fossil fuelled boilers in use.

There were suggestions that the approach to policy HT1 should align with transport policy TR3 - Supporting transition fuels which recognises the role of second generation renewable diesel as a transition fuel.

*"There is no detail on converting oil boilers that use kerosene to hydrotreated vegetable oil (HVO) (a renewable fuel)... HVO could reduce the carbon emission for a transition period." – Jersey Chamber of Commerce*

*"LPG ... helps to improve the quality of indoor and outdoor, as it produces substantially less particulate matter and NOX than diesel, oil, wood or coal...Critically in Jersey, it can also be supplied to customers wherever they are on Island, because of its ability to be used in pipelines, bottling and storage options.... When used in a gas boiler, BioLPG can reduce greenhouse gas emissions by 70%-80% in comparison to heating oil. This can be lowered further when consumed in a hybrid heat pump or combined heat and power system...the Government should recognise a role for LPG and in time BioLPG as part of a mix of technologies that can support the decarbonisation of the Island." – Jersey Gas*

*"The proposals in HT1 do not include the use of biofuels in existing boilers currently using fossil fuel. It is a relatively low cost for the conversion of existing boilers to use biofuel products currently available on-Island... This option would provide immediate lowering of carbon emissions output and should be encouraged to homeowners, at least until their boilers need replacing. Similar to comments made for TR3 above, the cost of Ecoheat 100 is substantially more expensive than fossil fuel equivalents, due to fuel duty levied by Jersey Government. It is recommended the duty is removed, to incentivise behaviour to reduce carbon emissions, and in a far shorter time period than waiting until boilers need replacing years into the future." – Rubis Channel Islands*



*"While the Roadmap focus is on carbon emissions, current building performance criteria considers energy efficiency. The translation to low carbon energy sources does allow the reduction in carbon emissions, however, may not improve building performance and should be considered secondary to performance enhancement.*

*The proposed aim of moving to low carbon energy sources is not in question, however current industry expertise, capacity and general construction industry momentum could slow the transition, and the potential of alternative lower carbon bio-fuel supply may provide an improved interim arrangement."* – **Association of Jersey Architects**

However, not all written submissions were supportive of introducing alternative renewables for heating systems.

*"We'd also like to understand what the 'specified alternatives' that would be eligible for grant support clearly defined. We believe burning alternative fuels should only be used as a last option and other measures or technologies may not lead to lower carbon emissions. We clearly need to understand these alternatives before we can assess them."* – **Jersey Electricity**

Questions were also asked relating to the suitability, efficiency, and effectiveness of electric solutions for all properties:

*"...Through our experience in the industry, any residential property larger than two/two and half bedrooms will need a boiler of at least 15Kw. This is the maximum size of electric boiler that operates on a standard single phase electricity supply, so if the property needs more than 15Kw, then a three-phase supply is needed (dig up the road/drive/garden etc.). This will cost approx. £8,000 with the new boiler being another £7,000 (minimum). So even with a £5,000 subsidy, this is too expensive. Moreover, the electric boiler will cost 40% more to run... An air source heat pumps (as an alternative to an electric boiler) will not suit many properties as the insulation will be below current standards..."* – **Romerils**

*"Concerns have been raised as to whether there is a sufficiently robust electricity infrastructure, across the entire network, and specifically into commercial buildings, to meet and deliver the increased demand for electricity... Consider a phased, Island-wide electricity infrastructure upgrade along the same lines as fibre installation, without cost to the end user."* – **Jersey Business**

However, Jersey Electricity ([Appendix 12.24](#)) suggest other low-carbon electric solutions are readily available for 'difficult-to-heat' buildings.

*[name of system] "allows retro home with traditional heating which previously would struggle to install a heat pump, to now switch to a greener more cost-effective solution... JE is already working in partnership with parishes to convert difficult-to-heat buildings with a combination of hybrid heat pumps, flow boilers and solar arrays... Storage heaters, smart panel heaters, cable underfloor heating and freestanding electric heaters are all also 100% efficient, easy to install and compatible with our decarbonised electricity supply. We believe, however, that due to the ease of installation and running cost benefits, electric flow boilers offer the best potential to get most buildings off the gas grid."* – **Jersey Electricity**



The incentive for commercial properties was considered inadequate and the subsidy would not encourage the transition to low-carbon heating systems in commercial premises:

*"...the level of subsidy envisaged, which is the same for a domestic property as for a commercial premises, does not recognize the significant investment needed to make the switch from fossil fuels especially in larger premises... one visitor accommodation business has recently changed its boilers at a cost of £2.4 million which includes not just the cost of the boiler, but also of upgrading the electricity infrastructure and other adjustments in the building. The subsidy envisaged would cover only 0.4% of the costs which makes no significant difference to the financial outlay of the project and therefore to the decision of the business to undertake it." - Jersey Business*

Written submissions suggest that there should be more of an incentive for improving building insulation:

*"The public are being asked to move to a potentially more expensive source of heating without the apparent checks on whether their home has an efficient building fabric first. One element of a bigger picture which could require homeowners to insulate, review moisture reduction methods and consider their carbon footprint." - Jersey Construction Council*

*"Any effort to encourage landlords or owner/occupiers to decarbonise heating systems must go hand in hand with an effort to encourage landlords or owner/occupiers to improve insulation in their properties (and we are glad to note that the policy makes mention of home insulation). Our members have reported being advised that changing a heating system to a more efficient type will not work if the highest standards of insulation are not present in a property and, in fact tenants will be generally colder in a building which has poor thermal performance and energy efficient heating than if they had fossil fuels. This is a significant factor holding back landlords from changing a system to a more efficient one. Subsidies must be made available... to encourage landlords and owner/occupiers to upgrade insulation... as well as heating systems." - Jersey Landlords Association*

*"The public are being asked to move to a potentially more expensive source of heating without the apparent checks on whether their home has an efficient building fabric first. One element of a bigger picture which could require homeowners to insulate, review moisture reduction methods and consider their carbon footprint." - Jersey Construction Council*

Policy HT1 does raise some significant questions, especially around the available and appropriately skilled workforce. This links closely to policy EN3 - Developing supply chains and on-Island skills for a sustainable economy.

*"With a grant / subsidy being provided to homeowners to help cover 5-% of the cost (capped at £5k) of Air Source Heat Pumps, I believe it is important to have in place and caveat attached to the grant scheme where only qualifies competent installers be able to undertake the insulation work for a claim to be made." - Redacted business 3*



*"The proposed aim of moving to low carbon energy sources is not in question, however current industry expertise, capacity and general construction industry momentum could slow the transition, and the potential of alternative lower carbon bio-fuel supply may provide an improved interim arrangement." – Association of Jersey Architects*

The written submission from Highlands College ([Appendix 12.18](#)) gives a great deal of thought to this specific issue. An abridged version of which is below:

*"...The industries that are linked to heating homes and businesses will face a major challenge in preparing their workforces for change. This will inevitably mean huge amounts of upskilling along with the creation of some new roles in the industry...*

*... Emerging technologies in the sector will bring new skills demands, for example, in the specification, design, and installation of digitally operated heating systems that ensure optimal efficiency. These skills will be required both of engineers and tradespeople, but also supporting personnel... There will also be new roles and jobs created not within the typical technical trades...*

*...The installation of heating systems that use the digital technology will also require a different approach in terms of skills training. Installers are used to using a single heat source (e.g., a boiler) when installing heating systems and the future model may require a combination of energy sources that work in collaboration. This will require skilled design engineers to specify, on many occasions, bespoke systems to maintain efficiency. There would potentially be the demand for new apprenticeship programmes that can be designed to meet the demand for these design technician roles, as well as looking at existing apprenticeships to ensure the practical competencies are reviewed in line with the installation skills required in the sector to install and maintain the working systems. It is worth noting that training a new operative up to technician level can take up to 4 years...*

*At the same time, the existing workforce will need an element of upskilling. It will be the case that some will need time to retrain, but there will be many that already have the transferable skills that are needed, and the skills gap closed by shorter, targeted training and topping up, rather than wholesale qualifications...*

*Training facilities and programmes will need to fully reflect the emerging technologies that will be at the heart of the changes as well as future proofing. New entrants to the industry will be required that learn these skills during their apprenticeships and existing operatives will need a skills analysis, leading to a comprehensive upskilling package that fully prepares them for the future of the industry. The quality of the training will be crucial as many of the system component installations are covered by a 'license to Practice' scheme, meaning installers must be legally qualified to carry out the installations" - Highlands College*

Policy HT1 has the potential to impact greatly on the Just Transition, especially on those in rented accommodation:

*"We warmly welcome the provision of a subsidy enabling householders and commercial businesses to transition to low-carbon heating systems. We understand that private residential landlords are included in this subsidy. We disagree however with a proposed cap on the number of multiple properties that a landlord can receive grant funding for. If a subsidy is available for one rented dwelling, it should be available for all of them (as long as the work on the dwelling is completed satisfactorily), particularly if the intention is to encourage all landlords to become compliant." – Jersey Landlords Association*





*This policy prohibits new fossil fuel boilers being installed in any property after 1st January 2026. The European heating industry is only now heavily investing in R&D towards viable fossil fuel alternatives. Therefore, early innovation is expensive. We need to gain more understanding of the electric and renewable heating market, review existing suppliers and explore new suppliers in order to form this policy... Electric boilers are often more expensive to run. This does not pose a "Just Transition". – **Romerils***

*We support the aims to subsidise the cost of new heating systems and better home insulation. Work must be done to ensure that rental homes in the private sector can be included in efforts to improve home insulation, as the tenants themselves will not have the right to initiate this for their homes, and the owners may not consider it worthwhile for them to do. Making available part grants / interest free loans to be for home insulation and domestic renewables installations will help incentivise households to make this change. –*

**Reform Jersey**

*"The proposed financial subsidies are insufficient, especially with low to middle income earners struggling with ever increasing prices of essential goods, like food, energy and fuel, and the reduction, and expected eventual removal, of GST de minimis on imported goods." – **Jersey Consumer Council***

It was reported that policy HT1 would have other associated impacts that should be taken into consideration:

*"There were 26 water pollution incidents reported to the Government of Jersey in 2021. We welcome a move away from oil heating systems – this will lead to a reduction in the number of oil [insurance] claims which are not only expensive but cause environmental damage." – **Crawford & Company***

*"It is noted that the main strategy for decarbonising heating is by improving heating systems, switching fuels, and improving the energy efficiency of buildings. These measures have the potential to make heating more affordable and improve the comfort of homes, which are beneficial for people's health and wellbeing. They also have the potential to play a part in reducing the effects of extreme heat events. There is evidence to suggest, for example, that a large share of excess winter mortality is attributable to the preventable experience of living in a cold home. Any proposals should, however, consider the potential adverse impact of increased noise on direct neighbours or the wider community if a few air source heat pumps are introduced to an area, causing noise creep. In proposing policies to decarbonise heating and improve the energy efficiency of buildings, it is also important to recognise the potential challenges this may cause for low-income households in relation to cost and affordability. The responsibility to reduce Jersey's carbon emissions must be shared fairly amongst the population and, similarly, must not reinforce health disparities." – **Public Health, Government of Jersey***

Policy HT1 applies to both commercial and domestic properties. However, it is argued that these should be considered separately and that any subsidies for the commercial sector require a rethink. The written submission from Jersey Business ([Appendix 12.19](#)) gives a great deal of thought to this specific issue. An abridged version of which is below:



*"Jersey Business recognizes that a subsidy for heating installation is included for commercial properties in the roadmap and this is welcome. Retail and hospitality businesses are open for long hours, including weekends, have numerous heat loss points such as open doors or delivery areas and are often in older building that are not energy efficient. If those businesses can be encouraged to swap to electric heating, the emission reduction that could be achieved would be considerable, especially in comparison to a home that is normally vacated during the day. However, the level of subsidy envisaged, which is the same for a domestic property as for a commercial premises, does not recognize the significant investment needed to make the switch from fossil fuels especially in larger premises. As a result, it would not provide an incentive to accelerate a change in commercial heating systems. For example, one visitor accommodation business has recently changed its boilers at a cost of £2.4 million which includes not just the cost of the boiler, but also of upgrading the electricity infrastructure and other adjustments in the building. The subsidy envisaged would cover only 0.4% of the costs which makes no significant difference to the financial outlay of the project and therefore to the decision of the business to undertake it... Many do not have the financial capacity to invest in large scale property upgrades especially if they can see little impact on their energy usage or costs." - **Jersey Business***

### Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session would potentially be directly impacted by the Heating policies. When discussing policy HT1 there were some strong concerns that moving many householders to electric heating would incur a considerable cost due to the three-phase electric power requirement for the 'last mile'. It was felt that until that issue is suitably resolved the subsidy on offer would not be enough to incentivise people to switch to low-carbon heating systems.

Many reported that clients who had made the switch stated that their energy costs had risen dramatically. This was more the case for those on oil heating. Many regarded gas as a fuel as having a limited life left in Jersey. It was noted that there are new developments in planning stages that have plans to use gas due to favourable costings. Questions were raised whether changing the development plans to electric could be considered for any incentives as revising plans was costly.

Hydrogenated Vegetable Oil (HVO) was suggested multiple times as a useful alternative transition fuel. Some had experience of householders converting boilers to use HVO. It was generally considered that a more useful incentive would potentially be to cover the cost of converting oil boilers to HVO whilst keeping a ban date as in accordance with policy HT2. It was commented that there would be a training need to convert boilers and that many businesses reported a staff shortage, particularly when looking for plumbers. This feedback links closely with policy EN3 - Developing supply chains and on-Island skills for a sustainable economy.

Insulation was thought to be very important but that such systems would not be suitable, efficient, or affordable in many homes. However, it was reported that insulating work was not well paid and that in a market where staff shortages are widespread finding people willing to take on this role would be very difficult. This again links back to policy EN3.

Commercial boilers were a huge issue with many heating systems being significant sums of money. Incentivising large commercial premises would require huge investment but also the infrastructure



would need to be in place and that was a significant concern. Many suggested that commercial boilers last considerably longer than to projected dates in policy HT1.

## Individual submission responses

Individual submission 914 ([Appendix 13.14](#)) considered the Just Transition and policy

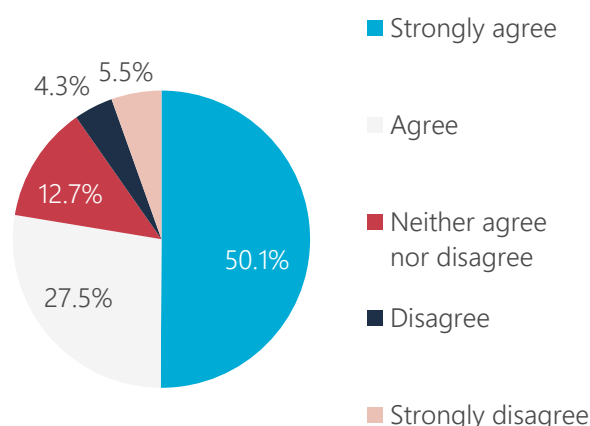
HT1.

*"In introducing any new policies, it is important to protect the fuel poor. This could be simply achieved by introducing variable "GST" rates on "net" electricity sales at a domestic level. Those customers with high electricity consumption would pay higher taxes on electricity kWh usage above a certain level. This level would be set above the low-level usage of the fuel poor. The additional tax revenue from "high" energy users could be used to support improved insulation in homes and/or renewable energy installations. This option would effectively introduce "block" tariffs and encourage the wise use of electricity, which in turn would support investment in renewable technologies. I am sure you already know that Jersey is one of the rare places which does not impose environmental taxes on electricity sales in addition to VAT/GST." - 914*

## Survey responses

Question 14 in the survey directly considered policy HT1 - Supporting low carbon heating systems and home insulation. *Question 14: To what extent do you agree that a financial incentive should be provided to encourage people to change their heating systems?*

	Answer Choice	Response Percent	Response Total
1	Strongly agree	50.1%	964
2	Agree	27.5%	530
3	Neither agree nor disagree	12.7%	244
4	Disagree	4.3%	82
5	Strongly disagree	5.5%	105
	answered		1925
	skipped		0



77.6% of respondents either agreed or strongly agreed that a financial subsidy should be provided to encourage people to change their heating system. Less than 10% either disagreed or strongly disagreed. This was a compulsory question so was answered by all respondents to the survey.

Question 17 of the survey asked: *Are there any other heating-related actions missing from the draft Carbon Neutral Roadmap?* Themes that came out of that question relevant to policy HT1 were:

Issue raised	Number of comments
Other energy sources	271
Insulation and energy efficiency	165
Cost, price and the Just Transition	137



By looking deeper into the comments made under these themes there were clear topics that came up many times. For example, there is a sense of nervousness and reluctance to move all properties to electric heating. Renewable, hydrogen and HVO<sup>23</sup> fuel alternatives dominated the comments relating to other energy sources.

*"The heating policy just seems to be pro electric, and it seems every other form of energy has been dismissed as too much effort. The UK will not be going all electric and the fuel for the future is green hydrogen. We should not dismiss options just the give more money to a States driven electricity company. It must be an open market"*

*"We can't just take away oil and gas and put all our eggs in one basket we need to explore renewable green energy more."*

*"I'd like to see greater focus on energy efficiency which doesn't seem to feature in the Roadmap very much at all."*

Many respondents wish to see the policy address subsidies for energy efficiency and insulation more directly.

*"Property insulation to avoid loss of heating should take priority when maintaining old buildings vs preservation of historical features like listed windows"*

*"Subsidies for insulation and improved glazing, particularly for old or listed buildings"*

*"Insulation of housing in terms of roofing, windows etc should also be high on the agenda to improve energy efficiency."*

The issue of cost, price and the impact on the Just Transition was also something that was raised many times regarding policy HT1. There were concerns raised that moving to electric from oil heating would be more expensive. There were also questions raised about the cost of installing electrical boilers. policy HT1 outlined that a different level of subsidy would be available for lower income householders. This is something that was not really picked up by respondents to the survey.

*"Other forms of heating are far too expensive to install and run!"*

*"For some properties moving to electric heating requires installation of 3-phase power, if the property is not on the edge of the road this can be a significant cost, in fact actually more than the cost of the heating itself. e.g., my power is single phase and crosses two fields (with a combined 8 landowners) to get to my house circa 200m!"*

<sup>23</sup> Hydrotreated Vegetable Oil (HVO) is a paraffinic bio-based liquid fuel originating from many kinds of vegetable oils, such as rapeseed, sunflower, soybean, and palm oil, as well as animal fats



*"Additional funding for low-income families/ households and old age pensioners."*

*"The focus should be on energy efficient heat sources primarily, rather than insulation retrofitting. Insulation improvements tend to lead to comfort take by the user and no net reduction in energy use. Changing a home's heating source, from oil or gas to electricity, will significantly reduce the emissions of a building without impacting on comfort. To avoid customers paying more for energy than they need to (i.e. if switching from oil to electricity) a greater focus should be put on air source heat pumps, both for water heating and home heating."*

## Social media comments

82% of those who took part in an Instagram poll answered 'yes' to the question: *Would you like a 50% subsidy to replace your oil or gas boiler?*

There were 27 comments on social media about the price of heating a home using an electric system rather than oil or gas, including the 'last mile':

*"Oil is a 100% cheaper than electric why should we be made to change"*

*"Would love to change from our current gas boiler but the cost is huge, we have been quoted approx. £5k just to get the right phase of electricity to the building let alone the actual boiler cost and changes to pipes / routes of pipes etc. gas is extraordinarily expensive, but this doesn't encourage us to change so any subsidy would be amazing."*

*"Whilst subsidy on boiler is welcome, need to also take into consideration to convert to electric heating some properties will require installation of 3 phase power which if not a roadside property can be a considerable cost and actually a major factor on whether to convert to electric heating"*

There were also comments regarding the suitability of electric heating for some properties and concerns about the cost of running electric heating:

*"Far too many properties here that unsuitable for electric heating due to lack of infrastructure electric will be 35% more expensive to run than oil, that will mean big increases of running costs for larger properties. No mention of brown gas being used as many boilers are now hydrogen ready. The island would be better giving grants for home insulation instead of knee jerk reaction of banning boilers..."*

Four comments were made on social media suggesting that people would wish to see more on home insulation:

*"Are there any subsidies or other schemes to help with home insulation?"*



Five comments also wanted to see the introduction of alternative fuels, especially HVO as a transition fuel similar to policy TR3:

*"Government of Jersey What about an oil boiler which is converted to run on HVO?? Or a new boiler which works on HVO? Will this be allowed? Electric is just not suitable for some homes, especially those older ones that are not insulated to the hilt..."*

There were also 45 comments similar to policy TR1 where people voiced concern about the electric supply and the energy trilemma:

*"Not until there is viable competition in the supply of electricity to keep prices down. The proposal of everything moving to electricity, and there being only one supplier with no competition, will inevitably lead to hikes in prices."*

## Summary

Many respondents raised the issue of the cost and subsidy proposed in policy HT1. It was widely commented that the cost would be considerably more than £10,000 if three-phase electric power and a heat source pump are required. Electric heating is not considered to be the most efficient system for some properties, including historic properties. It was therefore seen as important that other alternative fuels be considered, including using HVO as a transition fuel. It was also recognised that the costs associated with moving to low carbon heating systems in commercial premises would be considerably higher and that the subsidy should reflect that.

There were concerns raised about the capacity of the grid, with some respondents reporting that cannot get the necessary power to some parts of the Island. There were also concerns about supply of electricity coming from France and that the contract needs renewing. There were also concerns about Jersey Electricity having a monopoly and therefore respondents wanted to see measures in place to prevent prices from increasing without market competition.

The Just Transition was a key concern for this policy. Electric heating was widely considered to be more expensive in some properties than other heating types so there were concerns about increasing fuel poverty. There was also significant concern about the impact of this policy in rental properties, in particular domestic rentals.

The final issue was around on-Island skills and the need for a suitably trained workforce, which feeds into policy EN3 Developing supply chains and on-Island skills for a sustainable economy.

## 5.19 HT2 - Update building bye-laws

Policy HT2 looks to update the building bye-laws. It proposes to bring into force legislation that updates current building regulations and sets increased energy efficiency and carbon emission



standards of new and existing domestic and commercial buildings and prohibits new fossil fuel boilers being installed in any property after 1 January 2026.

### Written submissions

Written submissions were clear that although policy HT2 was welcomed, further work with industry is required to develop this policy.

*"Upgrading these standards is crucial, should be taken forward without delay and with Construction Industry consultation to ensure necessary capacity, training and performance is achieved." - **Association of Jersey Architects***

*"Insurance companies pay for reinstatement works...We need to better understand what the proposed changes will look like. What is the detail and how far are GOJ going with the building byelaws for improving insulation standards and energy efficiency and what that knock on will be for cost of claims for building repairs? This policy could have massive impact on claims spend. Going forward it is vital that the Insurance sector be involved in the bye law changes so the insurance market can have their say" - **Crawford & Company***

More clarity is needed as to what the proposed changes to the building bye-laws should be. But the focus needs to move to emissions, preventing heat from escaping properties:

*"Current Byelaws focus on energy and not emissions unlike the UK. What plans are in place to address this anomaly?" - **Jersey Construction Council***

The impact of policy HT2 on historic buildings was identified as important:

*"There is no acknowledgement that increasing energy efficiency in historic buildings may prove challenging and that some dispensation maybe required to ensure that the historic significance of buildings is not unduly compromised such as alterations to historic windows. The Trust believes that the policy should acknowledge the challenges presented by historic buildings and that it is paramount to protect and conserve historic significance." - **The National Trust for Jersey***

Policy HT2 seeks to prohibit new fossil fuel boilers being installed after 1 January 2026. There was a wide range of feedback on this part of the policy. There are concerns that the date could be too soon, especially in recognition of the skills gap. However, as detailed in response to policy HT1, there were questions raised about the potential to introduce alternative fuel sources which may provide a suitable stop-gap until such a time as the skill shortage has been addressed.

*"Some of the buildings in the accommodation sector have been in use for several decades and the cost of upgrading these older buildings to modern building and energy efficiency standards can be prohibitively expensive. We have already seen accommodation units exit the market because of these costs, consequently, if the costs or penalties are too onerous, they might trigger a decision to stop trading." - **Jersey Business***





*"No new Oil boilers from 2026 – unclear if biofuels could prevent this." - Jersey Construction Council*

*Many of our members own older properties and many of these are listed properties. Jersey has many such properties, and we would submit that very few of these meet modern energy efficient standards completely. Whilst the Roadmap seems to account for the fact that there will be "hard to treat" properties, it is unclear what changes to building bye-laws will mean for such older properties... retrofitting older (and particularly listed) buildings with such measures is acknowledged to be a much more difficult prospect and thought should be given to whether to include additional subsidies for the retrofitting of older/listed buildings... Requiring older or listed buildings to improve energy efficiency measures on the change of a tenant (rather than on a renovation or a sale) will be prohibitively costly for landlords and even if government were to heavily subsidise such work, the implementation of such a scheme by the end of 2024 will give landlords (and builders) very little time to implement such improvements." – Jersey Landlords Association*

*"Electrification is not an option currently available to many properties in the Island and it is important that regulations and policy reflect those different solutions will be required for different types of building stock and locations across the Island... Jersey Gas objects to the introduction of a constraint on the sale of gas boilers after 2025 on the grounds that this ate provides Jersey Gas with insufficient time to come to market with an alternative fuel. Jersey Gas argues that the policy should distinguish between distinguish between the environmental properties of oil and gas and should recognise the value of LPG as a transition fuel. Jersey Gas reasons that a mixed technology approach in Jersey would better accommodate and encourage consumers with different circumstances, earning capacities and building types to make environmentally sustainable choices..." – Jersey Gas*

## Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session would potentially be directly impacted by the Heating policies. When discussing policy HT2 – Update building bye-laws, there was very little concern about updating the building bye-laws. The majority of those who discussed this issue were clear that when rules are in place through mechanisms like the bye-laws then the trades will comply. However, it is important to give lots of notice and information before implementing changes and many of the trades would like to be part of the consultation process.

There were mixed responses regarding policy proposal which would prohibit new fossil fuel boilers being installed in any property after 1 January 2026. It was generally accepted that this was inevitable and that similar dates were being discussed in other locations. The points discussed in response to policy HT1 remained important when considering this date – namely the costs of both installation and running electric systems and reliance on imported electricity.

It was widely accepted that boilers could continue to be serviced and maintained. Again, there was concern about the skill and availability of people able to do the work. It was felt as 2050 grew nearer it would become increasingly hard to find people to service and maintain the remaining boilers.



## Individual submissions responses

Individual submission 901 ([Appendix 13.1](#)) raised concerns regarding policy HT2 and the costs associated with moving to an electric system as opposed to replacing with a modern version fuelled by their existing fuel type.

*"I have a four-bedroom house built in 1952. I presently have an oil-fired boiler. I recently obtained a quote to switch to an electric boiler. The quote came in at an extraordinary £12,500 (it included a requirement to upgrade to 3-phase electric power). Compare that with the fact that I could replace my present 20-year-old boiler with a new oil-fired boiler for about £2,000 or £3,000." - 901*

Individual submission 914 ([Appendix 13.14](#)) made suggestions for consideration regarding planning and building standards.

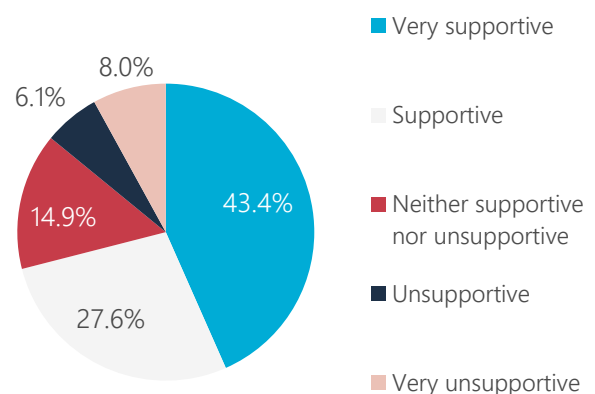
*"New roofs should be south facing, angled at 35' and be covered with at least 70% by PV panels... New homes should be fitted with simple energy monitoring and control systems on for example water heaters... New homes and apartments must have a 32Amp electric car charger point... Increase insulation values"- 914*

## Survey responses

Question 15 was a compulsory quantitative question to find out Islander's views on the date suggested after which new oil, gas and coal boilers could not be installed.

Question 15: *There are estimated to be over 20,000 fossil fuel boilers currently in Jersey. Boilers have a useful life of over 10 to 15 years. To meet our net-zero targets we need to stop new fossil fuel boilers being installed well before 2050. The draft Carbon Neutral Roadmap suggests that new oil, gas, and coal boilers will not be installed in any property after 1 January 2026, although existing boilers can still be retained and repaired until they need to be replaced. How supportive are you of this policy?*

	Answer Choice	Response Percent	Response Total
1	Very supportive	43.4%	835
2	Supportive	27.6%	532
3	Neither supportive nor unsupportive	14.9%	287
4	Unsupportive	6.1%	117
5	Very unsupportive	8.0%	154
	answered		1925
	skipped		0



71% of respondents were either supportive or very supportive compared to 14.1% who were either unsupportive or very unsupportive.



Many of the comments surrounding this policy were supportive of their being an end date to being able to install new oil, gas, or coal boilers but many felt it wasn't soon enough:

*"Why wait till 2026 to ban installation of new fossil fuel boilers? Can it be done sooner?"*

*"Legislation should come sooner!"*

### Social media comments

There were six comments on social media directly relating to policy HT2. However, the issue of historic buildings did come up in social media comments.

*"Can the Government update the policy on historic houses with traditional glass windows and allow more modern windows heat conserving windows, so much heat is lost through the old windows."*

### Summary

Policy HT2 proposes that the building bye-laws need to be reviewed. Policy HT2 is widely welcomed but reviewing and updating the building bye-laws must be done in consultation with industry. This policy also needs to fit with other key areas of work including the Island Plan review.

## 5.20 HT3 - Energy Performance Certificates

### Written submissions

Introducing legislation to make domestic and commercial Energy Performance Certificates compulsory at the point of sale or rental was received with a mixed response.

*"The JEAA (The Jersey Estate Agents' Association) fully supports the idea of EPC's becoming compulsory... subject to the implementation being similar to those requirements currently in force in the UK. With EPC's required for marketing a property for sale, it may encourage homeowners to improve the energy efficiency of their properties, raising overall standards, it may also provide sellers and buyers with a better understanding of any improvements which could be made by the new owner following the sale of a property." - **The Jersey Estate Agents' Association***

It was felt to be important that the model used to create Energy Performance Certificates should be locally developed rather than using models based on other jurisdictions to allow for Jersey nuances.

The Just Transition was raised a number of times in relation to policy HT3.

*"For rentals, we do not feel EPC's being required would have a negative impact on landlords, given that they would be proposed to be required for Landlords... subject to the implementation being similar to those requirements currently in force in the UK." - **The Jersey Estate Agents' Association***



*"RBS International is pleased to see the introduction of mandatory Energy Performance Certificate (EPC) requirements for residential and commercial properties. Financial incentives for customers purchasing energy efficient properties or making energy efficiency improvements are necessary as rising energy prices and inflation place further pressure on households... It is crucial that the EPC data infrastructure is easily accessible and can interact efficiently with the financial industry." – **RBS International***

*"Committing to setting legal requirements to reach minimum EPC standards at point of rental or sale for existing properties by 2026 could have unintended consequences for the Jersey property market... If existing properties could not reach the legally required minimums for sale what are the consequences? For example, could Jersey residents become trapped in energy inefficient properties as they age, economically unable to move to more appropriate accommodation in later years? If properties become vacant and cannot be sold will some be left to decay, providing yet further supply constraints on an already pressurised housing market?... If existing properties could not reach the legally required minimums for rental what are the consequences? Could this lead to a reduction in the supply of properties for rent, putting further pressure on rental prices and further disadvantaging those residents with lower income levels?" – **Skipton International***

*"...The EPC recommendation model here is based on the UK and not on Jersey Electric and Gas prices for comparison. As a result of the UK modelling tool, Heat Pump recommendations would currently be inappropriate. The introduction of SAP 10 in mid-2022, and the subsequent version of RdSAP, will retain a SAP rating based on cost-effectiveness. It is likely that SAP11 will switch from a cost-based rating to one which actually looks at the dwelling's energy use, this will be a major shift which will also likely see the introduction of a heat pump as an EPC recommendation. There is an opportunity to tailor the recommendation for Heat Pumps to Jersey EPC's by Quidos adjusting the software fuel prices to match Jersey prices or change it now to dwellings energy use as suggested for SAP11. I would hope there are a number of ways that Heat Pumps can be recommended as a result of a Jersey EPC, it's an opportunity missed without their inclusion" – **[Redacted business 2]***

*"Skipton supports the proposal to develop and introduce legislation to make both domestic and commercial EPCs mandatory at the point of sale and rental by the end of 2024. However, Skipton has concerns relating to the setting of minimum standards from 2026.... information will enable property purchasers and renters to make more informed decisions and better understand the cost of heating properties and their potential impact upon the environment... Skipton is currently considering whether Skipton should continue to offer mortgages to properties that do not have potential to be upgraded to a minimum level of energy performance... [Skipton is considering] the development of attractively priced mortgage products to assist existing mortgagors to improve the energy efficiency of their property, and hence positively support reductions in carbon consumption." – **Skipton International***

There needs to be some clarity if the legislation will require an energy performance certificate each time a property is leased or if a certificate will be considered 'valid' for a defined period of time.



*"If the building has not changed since its last assessment, it is difficult to see what benefits would be accrued other than additional bureaucracy and unnecessary expense. Would it not be preferable to request a new assessment to be undertaken if any physical alterations have been undertaken since the last lease similar to the current Parish rates assessment form. This would still enable EPCs to change and reflect those buildings that are on a continuous path of improvement." - **The National Trust for Jersey***

There were also concerns about the impact of policy HT3 on historic buildings.

*"Listed buildings are less likely to be able to reach higher energy performance levels due to constraints relating to their listed status. Is it the intention to make such properties exempt, as in the UK? Will a 'high-cost exemption' be considered where improvements are not cost effective?" - **Skipton International***

The availability of suitably trained auditors was raised as a significant concern for the delivery of policy HT3. Having a workforce able to make the recommended changes was also a concern. This fits with enabling policy EN3 - Developing supply chains and on-Island skills for a sustainable economy.

*"Similarly, the requirement for mandatory Environmental Performance Certificates (EPCs), training low energy heating specialists, performance and retrofitting expertise, the level of local skills needs to be radically and immediately overhauled to enable subsequent implementation within the desired timescale. This will require significant local training and financial encouragement to implement." - **Association of Jersey Architects***

*"There are very few people in Jersey who provide EPC, there must be many thousands of properties sold & rented each year. What is this minimum standard? Will it leave properties unavailable to occupy? Is there sufficient labour to insulate? What is the cost of insulation? Takes us back to the "Energy Trilemma" & "Funding a Just Transition". Jersey already has a housing crisis & shortage of retail shops, could this inadvertently exacerbate this." - **Jersey Chamber of Commerce***

*"If energy audits are introduced (linked to house sales) there will be the need for a number of suitably qualified personnel to carry out the surveys. This number could include existing operatives with transferable skills or new entrants to the industry. Once again, an element of training would be required." - **Highlands College***

## Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session would potentially be directly impacted by the Heating policies. Policy HT3 was a very interesting policy for those who engaged. Some were quick to identify a business opportunity whereby they could train as auditors and then provide the relevant works. A key concern throughout the session was the lack of suitable staff and training was a major issue.

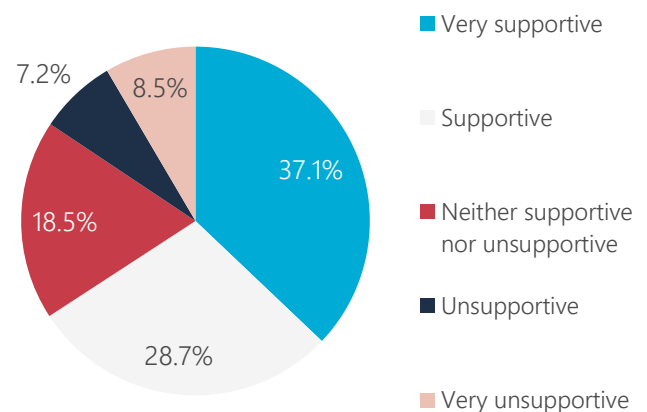


The incremental improvements need further clarity, without knowing what standards would be acceptable the respondents felt unable to comment. Historic buildings (including windows) were an issue raised many times for both commercial and domestic properties.

## Survey responses

Question 16 in the survey asked: *Energy Performance Certificates tell you how energy efficient a building is and give it a rating. They are already widely used across the EU and in the UK. The draft Carbon Neutral Roadmap suggests making both domestic and commercial Energy Performance Certificates mandatory at the point of sale and rental by the end of 2024. How supportive are you of this policy?*

	Answer Choice	Response Percent	Response Total
1	Very supportive	37.1%	714
2	Supportive	28.7%	553
3	Neither supportive nor unsupportive	18.5%	357
4	Unsupportive	7.2%	138
5	Very unsupportive	8.5%	163
	answered		1925
	skipped		0



65% of respondents said they were either supportive or very supportive of the introduction of energy performance certificates. 15.7% were either unsupportive or very unsupportive. This was a compulsory question in the survey so was completed by all respondents.

There were some comments made regarding Energy Performance Certificates in the free text questions. These comments were more mixed in terms of support for the policy than the results in Questions 16.

*"There should be a speed up of commercial EPCs as these currently aren't available in Jersey"*

*"EPCs are not effective in the UK. They are a tick box exercise that costs money and does nothing to encourage greener practices. Rather than copy this ineffective policy from the UK it is better to use the opportunity to come up with something different that is more likely to motivate people to change."*

*"EPCs should be brought in far earlier - why the delay? This will help people buying properties understand what they are buying."*

Historic buildings were a reoccurring theme in free text boxes, especially those that focused on the heating policies, in particular reference to replacement windows. Question 17 had 62 references to



windows and doors, most suggesting that the rules regarding upgrading windows in historic buildings be relaxed to allow double glazed window (that look identical).

*"Please rethink historic building requirements to keep wooden windows. There are alternatives that look identical and are far cheaper and energy efficient. It is a huge cost in making properties energy efficient. This is why I can't support standards while your departments make it almost impossible to achieve"*

*"Building regs should require windows to open rather than simply installing air conditioning"*

*"Listed building owners should be allowed to install more energy efficient windows. Secondary glazing is ugly, not very functional when looking to open windows and ventilate"*

## Summary

Broadly policy HT3 – Energy Performance Certificates was considered a good idea. However, there was concerns raised. Particularly that the scheme would need to be Jersey specific and there was a need to train and support local auditors and the trades people required to carry out the works identified in the audits. Clarity is needed regarding the minimum standards and the proposed incremental increases. The Just Transition was a huge concern and Islanders would wish to see more understanding how energy performance certificates will impact rental properties and those who are asset rich but cash poor.

## 5.21 Other on and off-Island emissions policies

There are six policies within the draft Carbon Neutral Roadmap that tackle other on and off-Island emissions.

## 5.22 OE1 - Promoting low-carbon lifestyles

### Written submissions

Policy OE1 Promoting low-carbon lifestyles was well received with a consensus that this was necessary:

*"Our new ways of working has provided colleagues with greater flexibility to work from home. It is important that businesses understand the climate impact of homeworking... RBS International has made improvements to our Jersey office to promote climate-positive behaviour, including improved facilities to encourage cycling to work. Employers must remove barriers facing employees as they strive to take climate-positive actions." – **RBS International***

*"I am especially interested in the education and engagement programme to help Islanders reduce their Scope 3 emissions. I believe there is a real disconnected between our purchasing choices and the resulting impact on the global environment... the education and engagement programme should not be just for consumers, but producers too. – so that we can all be part of the solution." – **The Good Jersey Life***





*"Make it easier for people to work from home so they don't have to drive so much. People should wear jumpers instead of putting on the radiators." – St Saviour School Eco Team*

*"We believe that increasing awareness of off-Island emissions is crucial as this is an area which needs to be tackled in order to truly become carbon neutral... being an Island means that we are reliant on outside sources. It is essential that Islanders are educated on the effects of their choices, and how they can make changes in order to reduce their impact on the environment." – Jersey Youth Parliament*

## Survey responses

Question 19 in the survey asked Islanders to rank which topics we should look at first regarding developing and delivering an education and engagement programme to help Islanders reduce their off-Island (scope 3) emissions. Some respondents reported difficulties in using the ranking system in this question. Others were unsure if ranking 1 was high or low. 107 respondents skipped Question 19. As a result of that the results from this question cannot be considered conclusive.

Order of listed topics in the survey	How the topics were ranked in order of importance
Construction and building materials	Food and diet
Food and diet	Waste (including recycling)
Agriculture	Construction and building materials
International air and sea travel	International air and sea travel
Investment and sustainable finance	Agriculture
Waste (including recycling)	Investment and sustainable finance
Electronics	Electronics
Clothing	Clothing

However, Question 20: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?* and Question 21: *Do you have any other comments on the draft Carbon Neutral Roadmap?* both had comments relating to policy OE1 - Promoting low-carbon lifestyles.

There are additional policies that relate to low-carbon lifestyles in the draft Carbon Neutral Roadmap:

- emissions from aviation and maritime transport (policy TR11)
- construction sector emissions (policy OE2)
- agricultural sector emissions (policy OE3)
- emissions from waste and water management (policy OE4)
- delivering a sustainable finance framework (policy OE6)

The education and engagement comments relating to these areas are also picked up in the relevant policies. However, it is evident that Islanders do want education and engagement programmes to help them best understand how they can make personal changes to adopt low-carbon lifestyles.



Question 21 asked Islanders *Do you have any other comments on the draft Carbon Neutral Roadmap?* There were a wide range of responses that suggested education, awareness, and engagement to help promote low-carbon lifestyles, some of which were extremely comprehensive.

There were comments looking for broader information on the issue of climate change

*"There needs to be more publicity and education around the devastating effects of climate change and how we will all be impacted by it e.g., crop failures, food shortages, mass migration etc. At the moment, too many people seem to think that this is all happening somewhere else, to someone else, sometime in the distant future. There is no connection in their minds between their excessive consumption of fast fashion, plastics, intensively framed foods, air travel etc and how they and their children will be personally affected by climate change."*

*"education is the most important tool in encouraging change."*

There were also more specific comments relating to key issues:

*"Don't shy away from the food and diet and animal agriculture issues, they need to be addressed!"*

*"Campaigns to use your car less and reduce your waste would be helpful. Need to be shown how a little change could make a big impact if we all do it."*

Despite the issues with Question 19, it is evident through the comments throughout the survey on the draft Carbon Neutral Roadmap that there is a real desire to see quality education and engagement and therefore this policy was supported.

*"Targeted education for finance, construction and other industries. Environmentally damaging products used in offices and building sites for which there are many alternatives now available. Green levies on the better off living in Jersey."*

## Social media comments

An Instagram Poll asked the question: *We're all going to change how we live our lives and that includes the food we eat. Have you already made a change to your diet for environmental reason?* The responses were spilt equally with 50% answering yes and 50% answering no.

## Summary

This policy was considered important. There is a lot of misinformation, it was recognised that Islanders need to understand the truth about which behaviours are better for the environment. Information needs to be accessible and from a trusted source as well as specific to Jersey. The differences between



how we manage our solid waste, for example, compared to the UK is very different and that can be confusing for Islanders. Help is needed to understand life cycle analysis and the circular economy.

There was also a real desire to be able to calculate scope 3 emissions so that reduction targets can be set. This is an issue where others outside of Government have expertise. It is not all for Government to solve alone.

However, there was some negativity around this policy when consideration is given to Jersey's emissions compared to significantly larger and more polluting countries such as China. It was suggested that funding this policy may not be a good use of public money.

## 5.23 OE2 - Construction sector emissions

Policy OE2 – Construction sector emissions proposes that the Government of Jersey will work closely with the Jersey Construction Council, Association of Jersey Architects, and others in the industry to drive-down the whole life carbon impact of the Island's construction sector. It also proposes that Government will also adopt higher construction standards for all public construction projects.

### Written submissions

Written submissions are largely supportive of policy OE2 - Construction sector emissions. However, it is acknowledged that emissions from this sector also include transport related emissions, and these are considered in the [Transport policy section](#). Introducing standards such as PassivHaus was well received but there were questions around if the certification aspect was necessary.

*"Modern construction methods are not limited to BREEAM, PassivHaus, Ennerfit. Gov must decide what standards are to be used and more importantly, what are best suited to the Jersey market. Furthermore, the decision to demolish and rebuild versus the retain and refurbish conundrum must be carefully evaluated... The Jersey Construction Council is committed to working with Government on this journey and as a major infrastructure facilitator, and local employer, is fully committed to a zero-carbon future." – Jersey Construction Council*

*"The AJA would welcome ongoing consultation to inform policy levers and construction standards. While improving standards to a level equivalent to Passivhaus or similar is encouraged, the mandatory requirement to achieve Passivhaus Certification at Planning stage should be avoided. Such controls would restrict development, architectural quality, result in increased pre-construction costs, timescales and endanger local consultation employment." – Association of Jersey Architects*

*"The reduction of emissions as set out in this policy proposal is supported. To aid the proposal, we recommend that serious consideration be given to incentivising the building of eco houses. These are houses which are pre-constructed off-site and then flat-packed and delivered to site. Construction time is significantly reduced and consequently the traffic carbon footprint. In addition, the extraction of raw materials for building products like sand and cement are substantially negated." – The Jersey National Park*



## Individual submission responses

Individual submission 913 ([Appendix 13.13](#)) included comments on emissions from the construction sector:

*"I object to excluding Stage 3 production of concrete from the carbon reductions knowing that if concrete production in the world was a country it would be the third largest emitter of CO<sub>2</sub> after China and America. Jersey excavated in the region of half a million tonnes of aggregates and sand per year primarily for producing concrete this is the equivalent of producing more CO<sub>2</sub> than the cars on Jersey's roads..." – 913<sup>24</sup>*

## Survey responses

There was no specific question in the survey relating to policy OE2 – Construction sector emission and there were not many references to construction sector emissions in the survey responses. Although there was not the same volume of comments that were provided on other issues, the responses regarding construction sector emissions in the survey were well thought out and supportive of the proposed policy.

Concrete especially was mentioned with regards to its high carbon footprint:

*"All planning applications will need a measure of CO<sub>2</sub> (impact assessment) being produced for a new building with the application and how CO<sub>2</sub> levels will be reduced. When will construction be required to use non-CO<sub>2</sub> emitting processes i.e., for concrete? etc..."*

*"Construction sector - concrete is always a problem environmentally due to how its constituent cement is made. Alternative building practices and materials should be encouraged / incentivised (along with Passivhaus requirements)."*

*"Support for green versions of steel, concrete and cement as well as modular building techniques with low embodied carbon. There has been a lot of concern recently around quarrying and sand extraction for building, plus upwards pressures on imports costs and spiralling house prices."*

## Summary

Policy OE2 - Construction sector emissions is accepted and seen as an important policy. Through the consultation pop-in session at Romerils and the engagement with Jersey Construction Council and other key stakeholders, the importance of consulting with the wide range of businesses within the sector was evident. Further consideration needs to be given to the development of the policy and continuing to work with Industry on developing this policy area is essential.

<sup>24</sup> Government of Jersey commissioned [Minerals, Waste and Water Study \(gov.je\)](#), published December 2020 by ARUP



## 5.24 OE3 - Agricultural Sector Emissions

Policy OE3 – Agricultural Sector Emissions sets out the need to develop and implement a new net-zero Rural Economy Strategy in 2022 that aims to support the agricultural sector (including aquaculture) to continue to reduce emissions from their activities, and to adapt to the effects of climate change. In 2019, the agriculture sector accounted for 6% of Jersey's total greenhouse gas emissions<sup>25</sup>. The largest agriculture emissions source in 2019 was enteric fermentation from dairy cattle. Emissions therefore come from the raising of animals for meat and milk.

### Written submissions

Emissions from the agricultural sector are relatively low, but public perception is that this sector is responsive for a larger proportion of Jersey's greenhouse gas emissions. Policies regarding agricultural transport, such as tractors, are considered in the Transport Emissions policies.

There are opportunities for the agricultural sector in reducing emissions but also in helping to educate. The sector has worked hard to improve its environmental performance already so this proposal for a new Rural Economy Strategy was well received.

*"As the first Dairy in the UK to comply with LEAF Marque standards three years ago, the Board has actively developed initiatives to improve both our environmental footprint and our biodiversity status within the Board's Dairy Environmental Enhancement Plan (DEEP)... In order to devise a sound long term strategy which meets the JMMB [Jersey Milk Marketing Board] /JD's [Jersey Dairy] and Government's objectives, [there is a need to] Compile a programme of research and development, specifically related to the requirements of Jersey's Dairy Industry, focussing on the mitigation of methane and nitrous oxide emissions, improving soil fertility and carbon sequestration, objectively evaluating our positive contribution to Island biodiversity, optimising energy sources at Jersey Dairy, whilst utilising the best scientific advice available... [it is also necessary to] Evaluate the importance of maintaining good agricultural land for quality, branded, local food production, as well as carbon sequestration, in the Island, and prevent its loss to alternative use" – Jersey Milk Marketing Board*

*"The development of a net zero Rural Economy Strategy is welcomed and supported. We recommend that financial information including incentives and level of Government support be specified in the 2022 plan." – The Jersey National Park*

Food security and the quantity of foods imported and exported were issues raised in the written submissions regarding this policy:

*The Island is dependent on imports for 96% of its food requirements... Our agricultural industry is in dire straits due to the lack of governmental and public support. The diversity of crops which were produced have gone together with the farms and farmers if we are to contribute to reaching carbon zero, we start with food production (security)...As a society we should not be dumping food" – Anneville Farm Limited*

<sup>25</sup> [Jersey Greenhouse gas emissions data 1990-2019 \(Aether-uk.com\)](https://www.aether-uk.com/jersey-greenhouse-gas-emissions-data-1990-2019)



*"The new rural economy strategy should consider the promotion of local food biodiversity, encouraging local produces to grow for the local market and not just focus on exports. It is recognized that, from the producers' point of view, this must be matched by increased spending locally by the consumers" – Jersey Business*

## Individual submissions responses

Individual submission from 908 ([Appendix 13.8](#)) suggested that policy OE3 should focus on local food production to reduce the amount of imported foods:

*"...it is disheartening to see so many empty greenhouses around the countryside, yet supermarkets are full of imported foods we could easily grow throughout the year. If the states have offered help with heating costs, why are they not in use? Farmers should be aware of cost and fuel involved by importing these foods. Supermarkets should purchase direct from growers and not import via England (crazy). - 908*

Individual submissions from 911 ([Appendix 13.11](#)) included, amongst other topics, the potential to sequester carbon on agricultural land:

*"We must acknowledge the importance of soil carbon and require agricultural subsidies to be targeted towards increasing soil carbon and away from intensive agriculture, including potato production." - 911*

## Survey responses

There was no specific question in the survey relating to policy OE3 – Agricultural Sector Emissions. However, Question 20: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?* and Question 21: *Do you have any other comments on the draft Carbon Neutral Roadmap?* resulted in comments relating to this policy.

The main issue raised was that people would like to be able to eat more locally produced food.

*"People need to be educated to eat locally grown produce - veg and meat. Much better than importing food from across the world where it is grown/ reared to lower standards than in Jersey/Britain"*

*"Local, organic food production should be increased and financially supported"*

Farming practices for locally produced food were also considered:

*"Government needs to work with local farmers and growers to support them to be able to produce as much food for local consumption as possible. They are part of the solution for getting carbon neutral. Regenerative farming is the key."*

There were also many comments relating to promoting plant-based diets and a move away from meat and dairy:

*"Don't shy away from the food and diet and animal agriculture issues, they need to be addressed!"*



*"You're not addressing the 'cow in the room'. Eating meat and consuming dairy are bigger issues than vehicle emissions."*

## Social media comments

*"If this is the case, why are they taken round dairy farms and taught there (sic) milk is good for them when in fact it's bad for them & the environment"*

## Summary

There is general agreement that a new Rural Economy Strategy is required. Industry and Islanders both wish to see more diversity in the agricultural sector as a way of providing food security and reducing the need to import foods. Issues relating to diet were raised but these comments are more applicable to policy OE1 - Promoting low-carbon lifestyles.

## 5.25 OE4 - Emissions from waste and water management

Policy OE4 – Emissions from waste and water management proposes that on-Island solid waste disposal will be made net-zero by 2040 and a net-zero water management strategy will be prepared by 2024.

## Written submissions

There were 6 submissions regarding policy OE4 - Emissions from waste and water management.

Emissions associated with the Energy Recovery Facility impact the carbon factor for Jersey's electricity. This is something that policy OE4 looks to address through carbon capture.

*"...The EfW plant's emissions are allocated to electricity production and significantly increase electricity's carbon content (albeit distributed electricity is very low carbon at 23g CO<sub>2</sub>e/kWh due to extremely low emissions associated with nuclear and hydro sourced power). Carbon capture could, therefore, have one of the most significant emissions reduction impacts by reducing the carbon in all of electricity's applications, including transport. There may also be possibilities to reuse CO<sub>2</sub> captured in other processes on Island."* – **Jersey Electricity**

Introducing commercial waste charging was the main area of concern in respect of policy OE4.

*"With increasing inflation, cost of living and costs of operations impacting our community and our businesses its essential that we take the positive initiatives of the Carbon Neutral roadmap further to ensure we have understand the cost of change, the affordability of these changes for business and individuals in order that we can ensure affordability, and that it does add further burden to either the costs of living or the costs of business operations to a point where we see ambitions that become undeliverable for us."* – **Jersey Chamber of Commerce**





Concerns relating to solid waste included how waste associated from delivery of goods would be treated for companies not based in Jersey. There was concern that introducing a commercial solid waste charge could disadvantage local retailers.

*"Will a "solid waste charge" adversely affect Jersey based retailers (against online competition)? i.e., if Romerils import a washing machine with associated packaging waste that is charged to Romerils, will that charge also be applicable to a non-Jersey online retailer? This must be considered" – Romerils*

Costs associated with a potential commercial liquid waste charge were also cause for concern. Such a charge would especially impact the hospitality and leisure sectors. However, other sectors such as hair and beauty may also be negatively impacted as they use large volumes of water.

*"Jersey Business recognizes the need for net-zero waste and water management strategies, and notes that the Government will consider the introduction of commercial waste charges for some activities. Concerns have been raised in relation to how a waste water management strategy will regulate different types of waste water. Many businesses, particularly by venues with pool facilities, deal with a large volume of water waste, varying from grey water (sinks, washing machines, bathtubs and showers) to black water (kitchens, dishwashes, toilets etc). Policy in this area must provide the infrastructure and support to enable business to make the necessary changes without unfairly penalizing them. Consideration should be given in the waste strategy to recognise domestic and commercial properties who re-utilise their grey water. There should be a mechanism by which those who utilise their grey-water are not charged for water treatment at the same level as water supply. Consideration should be given to how commercial pools are affected by the water management strategy to ensure they remain operational" – Jersey Business*

## Survey responses

There was no specific question in the survey relating to policy OE4 – Emissions from waste and water management. However, there were comments made with regards to policy OE4 in response to both Question 20: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?* and Question 21: *Do you have any other comments on the draft Carbon Neutral Roadmap?*

46 comments focused on recycling. Respondents want to improved recycling services, perhaps a joined-up approach to recycling across the Island to make it easier for people. There were comments requiring introducing food waste and green waste collections.

*"A plan to move to joined up whole-Island recycling, instead of a patchwork of parish collections would be very welcome and offer efficiency gains. Bringing in food waste collections, in line with the UK, would also be extremely welcome."*

*"Requirements for improved recycling and food waste collection services for domestic and commercial premises"*



*"Compulsory kerb side recycling in all parishes for tins, cardboard, paper, glass, kitchen waste and plastics on a 2-week basis, offset by mixed collections every other week."*

*"There should be green waste collections provided from parishes (i.e., biodegradable food and garden waste) alongside the existing recycling schemes. All single use plastic must be stopped being sold and used..."*

However, issues of reducing emissions from waste and water management were not fully addressed by respondents to the survey.

## Summary

There is a real appetite amongst Islanders to improve waste management, in particular recycling, and therefore the commitment to developing a new net-zero waste strategy was well received. However, considerable concerns were raised about the impacts of commercial waste charging and these impacts must be fully understood in the development of such policies.

## 5.26 OE5 - F-gas emissions

The policy OE5 – F-gas emissions sets out an ambition to extend the UK's compliance with the Kigali Amendment to Jersey by 2025.

### Written submissions

Jersey Business developed a written submission with members from the hospitality sector, it can be found in [Appendix 12.19](#).

There were five written submissions that referred to policy OE5 – F-gas emissions. They were supportive of extending the UK's compliance with the Kigali Amendment to Jersey by 2025.

*"Businesses in food retail reported that early investigation into more sustainable refrigeration systems are available within their budgets, but a lack of on Island servicing skills made the purchase unviable. Consider extending the 'Dependencies' for this policy to include the availability of suitably qualified local tradesmen to install these sustainable systems and service them, with reference to the policy on Green Skills (EN3)" – Jersey*

***Business***

*"Like most power utilities we utilise sulphur hexafluoride (SF6) gas for electrical plant. We are aware of the potency of this as a 'greenhouse gas' and we avoid its use where possible. We have a long-standing policy not to use this in equipment where there is a viable and effective alternative. As a small utility, we have limited influence in manufacturers' R&D [research and development], however we encourage alternative technologies where possible. We also regularly monitor the market for technological developments for alternatives. We maintain and monitor SF6 gas inventories, within our reporting." – Jersey Electricity*



## Survey responses

There was no specific question in the survey relating to policy OE5 - F-gas emissions. There were also no comments made in any of the free text questions relating to this policy.

## Summary

There was limited feedback on policy OE5 – F-gas emissions. All were supportive of the principle to extend the UK's compliance with the Kigali Amendment to Jersey by 2025.

## 5.27 OE6 - Delivering a sustainable finance framework

### Written submissions

A number of financial institutions provided written submissions to support policy OE6 - Delivering a sustainable finance framework. Written submissions suggested the framework would be useful in establishing Jersey's place as a credible sustainable finance jurisdiction.

*"Supporting the objectives of the Paris Agreement and the fight against climate change is increasingly seen as an important part of that - with investors, gatekeepers and international partners looking to jurisdictions to demonstrate sustainability credentials... Sustainable Finance on a Sustainable Island: the CNR supports one of the key critical success factors that underpin our sustainable finance strategy... During the research we carried out to develop that strategy, industry respondents repeatedly emphasised that to be credible as a sustainable finance centre, we must be able to provide evidence that we offer 'sustainable finance on a sustainable Island'. We expect that the local transition will play a key part in enhancing Jersey's attractiveness as a finance centre."*  
**– Jersey Finance Limited**

*"Recognising the pivotal role the finance industry can - and should - play. This to include guidance and administration of green bond issuance and the management of public pensions and reserves in sustainable investment strategies. The latter actively reducing the Island's Scope 3 emissions"* – **Affinity Private Wealth**

*"...This government has focused on the financial sector more than anything else, while they could be making legislative efforts to reduce climate change on the Island." This is a policy that we feel particularly passionately about, as since finance is such an important industry in the Island, it is essential that sustainability is ensured, as it has a large-scale impact. We feel that it is crucial to deliver a sustainable finance framework, as it could indeed have effects on a global scale and will establish Jersey as a leader in innovation within finance."* –  
**Jersey Youth Parliament**

The delivery of a sustainable finance framework should align Jersey with UK and international standards. Written submissions suggested that introducing climate-related financial disclosures would be an important aspect of the sustainable finance framework.



*"Post COP26 a growing number of people... are keen to see Jersey moving towards mandatory climate-related financial disclosures; based on the Task Force on Climate-related Financial Disclosures report designed to help nations meet their net-zero ambitions. If Jersey chooses to go this way there is a growing understanding that the policy will deliver a regenerative statement to international investors that Jersey is a leading sustainable Island to do business in... Jersey won't be the first jurisdiction shifting towards mandatory climate reporting for companies and financial institutions. In October, the UK government announced formal plans to introduce legislation requiring mandatory climate-related disclosure, and the US SEC Chair Gary Gentler revealed earlier this year that he aims to have proposed rules in place for mandatory climate risk reporting by companies by the end of this year." – **Dark Green Carbon Farm Foundation***

The draft Carbon Neutral Roadmap has a significant funding gap which is addressed in strategic policy 3 – Financing strategy. However, the finance industry has a key role to play in enabling Islanders to adopt low-carbon lifestyles through products and services such as green mortgages and loans.

*"Within our finance arm, Cherry Godfrey works with many Jersey companies to offer incentivised finance solutions for domestic and commercial 'green energy' loans. This ability would marry well with the government grant scheme" – **Cherry Godfrey***

The risk associated with not delivering a sustainable finance framework was considered to be huge, potentially damaging the sector's existence in Jersey.

*"Our industry is made up of nearly 14,000 professionals who call Jersey home. They want to see change at a local level that enhances Jersey's attractiveness and enviable quality of life, preserves our environment, develops our resilience to climate change, and builds a more sustainable future for all. Younger professionals are especially anxious to see strong action to tackle climate change from both Government and employers. If Jersey cannot deliver tangible action that is aligned with those values, it risks losing its attractiveness as a talent hub." – **Jersey Finance Limited***

## Individual submissions responses

Individual submission 902 ([Appendix 13.2](#)) raised the issue of climate related disclosure.

*"Your route to Net Zero is fundamentally flawed! ...The best GOJ can do for our Island is to force financial institutions, pension funds, government departments and utilities, to issue climate-related disclosure and net-zero plans and let the marketplace do the rest. You will not be alone the UK, USA and Canadian Governments already are committed because it makes GOOD COMMERCIAL SENSE!" – **902***

## Survey responses

There was no specific question in the survey relating to policy OE6 - Delivering a sustainable finance framework. Comments relating to the finance industry came in response to Question 20: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?* and Question 21: *Do you have any other comments on the draft Carbon Neutral Roadmap?*



Comments recognised the global impact of our finance sector and the opportunity to make a difference to global emissions:

*"It would be interesting to know how much the finance industry contributes to carbon emissions. Many businesses are based here but their work will have implications elsewhere."*

*"Legislation must be introduced to force the divestment in fossil fuels by the Finance sector"*

It was also felt that the finance sector could fund the decarbonisation of the Island:

*"Probably the biggest effect we can have as an Island, which could actually make us carbon negative, is through the finance industry. If we legislated to ensure that all financial transactions conducted in the Island must account for carbon emissions, perhaps by taxing any transactions in fossil fuel industries, this would have an absolutely enormous global effect, would be good for Jersey's international reputation, and raise significant money for the Island to pay for all the other policies."*

*"[Jersey] can attract international finance by having the correct regulatory and legislative platform - a green economy - this can be used to fund the £200m shortfall to allow Jersey to meet the Paris Agreement targets and have a positive impact."*

There were comments that also suggested that there was scepticism about the potential of the sustainable finance:

*"Very important to ensure any green/ESG finance actions aren't simply an exercise in greenwashing, but are fit-for-purpose and rigorous, with material change, rather than a re-naming exercise."*

## Summary

Policy OE6 - Developing a sustainable finance framework was well received. The framework would complement strategic policy 3 – Financing strategy. The role of providing finance to enable the transition to a decarbonised economy is an important role that must be considered in the framework. The sustainable finance framework could position Jersey's finance sector as a credible as a sustainable finance centre. Employing a significant number of Islanders, the reach of this framework will also have a considerable benefit on supporting low-carbon lifestyles. Work in this space is well underway with the existing long-term strategy: Jersey for Good – A Sustainable Future<sup>26</sup>.

## 5.28 Enabling policies

Policies that enable delivery and implementation and support the systemic change needed to make a just transition to a low-carbon economy.

<sup>26</sup> [Jersey for Good: A Sustainable Future \(Jersey Finance\)](#)



## 5.29 EN1 - Decarbonising Government of Jersey

Policy EN1 - Decarbonising Government of Jersey proposes how the Government of Jersey will reduce its operation emissions in line with the Paris Agreement as set out in strategic policy 1.

### Written submissions

This policy was widely supported through the written submissions:

*"Government must lead on all the initiatives contained in this document and ensure a steady, managed stream of work so the industry can respond and meet these demands" – Jersey Construction Council*

### Survey responses

There was no specific question in the survey relating to policy EN1 - Decarbonising Government of Jersey. However, through all of the free text questions there were comments relating to the Government of Jersey leading by example.

Question 8: *What else would make you more likely to switch to an electric vehicle when you next change your car?*

*"If the government were seen to be proactive in pioneering electric vehicles across their fleet and pushing public transport and the disgustingly polluting tantivy bus fleet to change to electric or hydrogen powered, then this would set an example and show their commitment to this policy."*

Question: 13: *Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*

*"If Government departments aren't using electric vehicles, how are they expecting the public to use them? Time to lead by example"*

Question 17: *Are there any other heating-related actions missing from the draft Carbon Neutral Roadmap?*

*"... A new hospital and Civil Service HQ are being built, what considerations are being given to the CO<sub>2</sub>E emissions in terms of the life-cycle costs and cradle to cradle elements of these constructions? Will we see, for example, a preference for triple-glazed windows as opposed to double glazed - the latter having a lower carbon footprint than the former?..."*

Question 18: *Do you have any other feedback on the heating policies in the draft Carbon Neutral Roadmap?*

*"...this needs Government to lead by example"*



Question 20: Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?

*"What about compulsory solar for all new builds and government buildings"*

Question 21: Do you have any other comments on the draft Carbon Neutral Roadmap?

*"The Government should lead by example by setting targets for its own vehicles and buildings which exceed those required by the Roadmap."*

*"Every government department should lead the way and be carbon neutral asap"*

### Social media comments

There were several comments on social media asking for the Government to lead by example.

*"So, Government of Jersey what are you doing about you whole fleet of diesel cars, and more so commercial vehicles ??"*

### Summary

There is a general acceptance that policy EN1 should be delivered. Respondents were clear that Government should lead by example and therefore this policy was well supported.

## 5.30 EN2 - Create a Carbon Neutral Alliance

Policy EN2 – Create a Carbon Neutral Alliance proposes to work with the Economic Council sustainability working group to support the development of a Carbon Neutral Alliance of businesses and voluntary, community, social enterprise and faith sector organisations; and establish a £500k Climate Action Fund to support grassroots projects to tackle the climate emergency.

### Written submissions

Policy EN2 – Create a Carbon Neutral Alliance was universally well received. Many of those who referenced the Alliance in their written submission would like to be involved. There were no comments against this policy, however it was questioned if there was sufficient funding allocated.

*"If this [Carbon Neutral Alliance] comes about Chamber should and will fully engage. Understanding the data which needs to be comprehensive and accurate is key to positive involvement and good decision making and true cross discipline participation is vital to gain full benefit! – Jersey Chamber of Commerce, Environment Committee"*





## Summary

Policy EN2 - Create a Carbon Neutral Alliance was not something that was picked up by many respondents to the survey or through social media. However, written submissions suggest that policy EN2 - Create a Carbon Neutral Alliance was seen as an important policy that should be implemented.

## 5.31 EN3 - Developing supply chains and on-Island skills for a sustainable economy

Policy EN3 - Developing supply chains and on-Island skills for a sustainable economy proposes putting the development of on-Island skills at the heart of future economic and skills strategy, including integrating green skills into the Future Economy Programme and Further Education and Skills white paper.

It also proposes that the Government will support the development of low carbon and sustainable supply chains

### Written submissions

Written submissions for this policy have been split into developing supply chains and developing on-Island skills. The emphasis on submissions was on the skills aspect of the policy with few commenting on supply chain.

### Developing supply chains

Written submissions addressing transport and heating policies also considered supply chains. However, there were broader comments in relation to policy EN3 developing supply chains specifically.

*"The responsibility is being put on businesses to understand and work with their own supply chains to reduce carbon emissions. Many will have access to the resources, knowledge and skills to do this, however this could be difficult and onerous for smaller businesses that do not have the same leverage or where there is limited competition in the local supply chain. The consumer has a role to play, and a broader use and promotion of the benefits of locally produced goods and services would be impactful... Jersey Business should be resourced to provide specialist environmental sustainability support to the local business community to help them understand their carbon footprint and to take actions to reduce it." – Jersey Business*

*"I especially welcome the local market supply chain audit with gap analysis. I note the intention to ensure there is access to low-carbon products, however one area of concern is the potential for greenwashing where customers believe they are purchasing goods or services which they believe to be lower carbon or sustainable but aren't on fuller investigation. I think that it is imperative that individuals and businesses can identify the environmental credentials within the supply chain, potentially through existing certification programmes such as eco active, or other international accreditations (ISO 14001, B Corp, Global Sustainable Tourism Council, Green Kitchen Standard etc)" – The Good Jersey Life*



## Developing on-Island skills

The importance of developing on-Island skills was widely accepted and was considered something that should be prioritised by most. Highlands College's written submissions clearly set out their potential to act as the lead in quipping Jersey to have the necessary skills needed to become net-zero. Their full submissions can be read in [Appendix 12.18](#):

*"To enable this to succeed the college need to see the investment in infrastructure, training, and resources with the political support to educate and train the skills that will be in demand in the near and planned future. We are on the brink of an exciting shift to a more sustainable future, which embeds Highlands College and the skills agenda at the heart of the community." – **Highlands College***

*"Jersey Business welcomes the intention to put the development of on-Island skills at the heart of the future economy and skills strategy. Concerns about a lack of skills routinely came up in discussions around many aspects of the carbon roadmap... Specific concerns were also raised about having enough specialist engineers to service the new low-carbon products being installed and the availability of electricians as demand rises. Jersey Business welcomes the intention to carry out a local market supply chain audit including gap analysis to identify supply chain issues which may limit implementation of the policies. This should also be used as an opportunity to identify opportunities for new innovative products and services that could be offered by new or existing businesses." – **Jersey Business***

*"We are currently experiencing issues with recruiting local skilled staff across a variety of positions. The piece of work in EN3 needs to be accelerated to be able to achieve many of the objectives in the CNR. There will be a need to upskill existing skilled workers and due to the requirements of the transition, the workforce in the energy industry will need to increase." – **Rubis Channel Islands***

*"We fully support this policy as we understand the importance of improving the skills available to aid decarbonisation, as without sufficient training, we will not be able to fulfil all the policies outlined. So, we therefore believe that emphasis should be placed on this initiative, as it is one that will be imperative in ensuring Jersey's future." – **Jersey Youth Parliament***

*"Training can be costly for small-medium businesses, not just the cost of it but the working time lost, especially if it's off-Island. Grants and funding to help train more employees would be welcomed." – **A Cornish Electrical***

*"The industry has a proven track record in developing new skills. What plans are in place and when will they be made available. Training needs to be made available locally, working closely with Highlands college. Training must be ahead of the curve, so the industry is ready for when policies are adopted. Are Highlands already planning for the new skills required? Will training be funded? There are subsidies for ASHP, but not insulation; what happened to fabric first? There are currently no cavity wall firms on-Island. What is being done to address this issue? There is currently a shortage of PassivHaus experts on-Island. What is being done to address this issue? – **Jersey Construction Council***



## Engagement centre with trades

Many of the people we spoke to at the trade centre engagement session raised the issues surrounding policy EN3. Namely that there needed to be a better local supply chain – with frequent references to the closure of the Simon Sand Quarry. The cost of importing goods was a concern and the impact that would have on the end consumer. It was felt that Government need to do more to strengthen on-Island supply chains, especially for those that are helping with this agenda.

There were frequent references to a staffing shortage and a lack of suitably trained workers – or those willing to undertake training. It was felt that schools needed to do more to promote the construction sector to position it as a favourable career as too much emphasis was currently placed on careers in finance. Apprentices and day-release schemes were well received but finding people to train was becoming increasingly difficult. It was suggested that since COVID-19 many temporary workers have left the Island and that the cost of living was preventing Jersey attracting new staff. The need for a population policy that considered the labour market was mentioned many times. Those in trades felt excluded from such discussions suggesting that finance and hospitality were given preferential treatment and construction was not included in discussions and consultations. The commitment set out in policy EN3 is to carrying out a skills gap analysis and to work with industry and Highlands College was extremely well received.

## Survey responses

There was no specific question in the survey relating to policy EN3 - Developing supply chains and on-Island skills for a sustainable economy. However, there were comments on both supply chains and skills in the free-text questions.

Question 8: *What else would make you more likely to switch to an electric vehicle when you next change your car?*

*"I am a mechanic and there are not enough trained personnel who can work on the vehicles we already have on the road."*

Question: 13: *Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?*

*"There will need to be support for the services surrounding the industry too for example mechanics will need training. Teachers will need to be trained to deliver the up-to-date courses at highlands and perhaps the curriculum needs amending for GCSEs in DT or Science to explore 'electricity' in different contexts."*

Question 17: *Are there any other heating-related actions missing from the draft Carbon Neutral Roadmap?*



*"Skills training - GoJ needs to address the skills gap with free training course"*

*"Training for those involved in the industry so that services are ready when the deadline arrives."*

Question 18: Do you have any other feedback on the heating policies in the draft Carbon Neutral Roadmap?

*"There are hardly any energy assessors - there needs to be more training."*

Question 20: Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?

*"An education apprenticeship scheme for young people to learn green politics; green agricultural practices, organic farming; renewable energy mechanics; manufacturing of local agricultural products; any carbon neutral renewable skill needed for a sustainable Jersey."*

Question 21: Do you have any other comments on the draft Carbon Neutral Roadmap?

*"There is a huge need for on Island upskilling, work has to be done to ensure sectors are on board with the changes."*

There were fewer comments about the supply chain part of the policy. There were comments that suggested that locally supplied goods and services would strengthen supply chains as well as reducing emissions from transporting goods and services to Jersey:

*"In 2021, the local sand pit was closed and sand is now imported from overseas - what is the environmental impact of this decision?..."*

*"We are already seeing the supply chain problems with imported food. We can't provide enough food to feed the population, but this could be assisted by more encouragement to the local farming industry and to private individuals."*

The supply chain part of the policy did raise questions:

*"Will companies have to determine the CO<sub>2</sub> associated with supply chains etc? products and measured reductions over time? Will this be submitted to government or third party for certification?"*



## Social media comments

There were not many comments relating to policy EN3 on social media. However, it was recognised that having a suitably skilled and trained workforce was essential to the delivery of the Roadmap:

*"Might also be a great idea to get all the electric charging points in place first before talking about scrapping cars. In saying that, if you can find enough elections to do the work. Manual workers to trench in the cables, plus all the parts needed to make the chargers..."*

## Summary

Policy EN3 - Developing supply chains and on-Island skills for a sustainable economy was considered by many to be the first step required in order to meet the ambition of the Carbon Neutral Roadmap.

Developing supply chains was considered important for the economy and resilience of Jersey. But there was recognition that increasing locally produced goods and services should not impact on higher prices for end users.

Having a skilled and suitable training workforce was felt to be the key to the successful delivery and implementation of many of the policies. Working with skills and training providers as well as industry was considered to be a top priority for many, and further development of this policy should be done in partnership with key stakeholders.

## 5.32 EN4 - Delivering the COP26 education pledge

### Written submissions

There was clear support for policy EN4 – Delivering the COP26 education pledge. Comments linked across to policy EN3 - Developing supply chains and on-Island skills for a sustainable economy. It was widely acknowledged that policy EN4 will help Islanders to understand climate change and its impacts as well as better understanding what they can do to help to meet the net-zero targets.

*"In primary I never got taught about climate change but in secondary we learn a lot about climate change in geography and in form we sometimes talk about similar stuff relating to climate change." – Le Rocquier School*

*"... We feel very strongly that good quality education on the environment within schools is something that is essential in order to build a sustainable community, in which everyone understands and cares about climate related issues. This is the only way we will truly be able to succeed, as we need to change the general mindset towards climate change and our role in solving it." – Jersey Youth Parliament*

*"DWCT supports the GoJ in delivering the COP26 education pledge (EN4). We hope that our vital conservation work at DWCT supports this and provides a collaborative opportunity to increase awareness of the links and impacts between climate change and the biodiversity crisis." - Durrell Wildlife Conservation Trust*



## Survey responses

There was no specific question in the survey relating to policy EN4 – Delivering the COP26 education pledge. However, the free text questions all had comments relating to the delivering education or how children travel to school.

Question 8: *What else would make you more likely to switch to an electric vehicle when you next change your car?*

*"School transport would be key decision on using car less and changing to different size car."*

Question: 13: *Do you have anything else to say about the transport-related actions in the draft Carbon Neutral Roadmap?* There were comments related to 'the school run' and encouraging people to get to school by other means:

*"Making walking and taking the bus and cycling to schools safer"*

Question 17: *Are there any other heating-related actions missing from the draft Carbon Neutral Roadmap?*

*"Education is key. People need to buy into better insulation and understand the benefits of it."*

Question 18: *Do you have any other feedback on the heating policies in the draft Carbon Neutral Roadmap?*

*"...education important"*

Question 20: *Are there any further actions that you think should be included in the draft Carbon Neutral Roadmap and the policies?*

*"Better education in primary and secondary schools to raise a generation of changemakers and ambassadors for climate change. ..."*

Question 21: *Do you have any other comments on the draft Carbon Neutral Roadmap?*

*"... The future of this will be our young people. Please make sure this is covered in schools and education settings also..."*



It was also recognised that education is not just about schools:

*"Focus on adults not children...it's easy to say education of the younger generation is the answer but it really isn't...the focus needs to be emergency actions on adults who are in denial and will need to be supported through grief before they take action...What is the plan for the deniers?..."*

*"Education I think is really important to get people behind this. Going into workplaces and offering pop up events so the general public can go and learn is really crucial. Lots of people can be negative about change so if you can find ways to teach them, I think this will help you with implementing the Roadmap."*

## Summary

Education was something that seems to be considered as important to many Islanders. Feedback from the consultation was that Islanders are not comfortable with much of the language and science behind climate change. Comments on both the survey and social media suggested that terms such as net-zero and carbon neutral were confusing and there were calls for helping people to better understand.

Although the focus of comments was on traditional school / college education it was recognised that this policy needs to have a broader educational reach including education for all Islanders. This policy needs further development and considerations should be given to other policies including policy EN3 - Developing supply chains and on-Island skills for a sustainable economy and policy OE1 - Promoting low-carbon lifestyles.

## 5.33 EN5 - Blue Carbon, biodiversity and sequestration

Policy EN5 - Blue Carbon, biodiversity and sequestration proposes that Jersey should become a centre of excellence for blue carbon sequestration, with an ambition to double the extent of sea grass beds and recognise that tackling the climate emergency by using nature-based solutions that also address the biodiversity crisis provides multiple benefits for our land, air and sea.

### Written submissions

There was support for policy EN5 - Blue Carbon, biodiversity and sequestration. The benefits for such project were far broader than carbon abatement:

*"The Trust very much welcomes this policy but would also like to see a commitment to protecting our existing blue infrastructure as a whole and not just focusing on sea grass beds. Other seaweeds including kelp also have the ability to absorb significant carbon and should be duly recognized. The Trust would also like to see a recognition of the value of restoration for addressing the biodiversity crisis as opposed to simply focusing on protection. The National Parks in the UK are a good example whereby landscape protection has been delivered over the years but little biodiversity enhancement. Restoration projects could be applied to both terrestrial and marine landscapes." – The National Trust for Jersey*

*"The potential for sequestration of carbon emissions in the marine environment is supported in principle. A Marine Spatial Plan would need to ensure that analyses were made of the biodiversity and environmental impact for any marine site selected for blue carbon." – The Jersey National Park*





*"While BLUE welcomes the ambition to double the extent of seagrass beds in Jersey's waters, a carbon neutral roadmap and strategy should also include recognition, protection and objectives to increase the area covered by all blue carbon/high-biodiversity habitats... The Jersey Carbon Neutral Roadmap should include aims for protection and growth of all high carbon habitats (not seagrass alone). Protection of a variety of habitats should be achieved through ecosystem-based protection measures such as designation of large areas of protection. In order to achieve additionality and generation of a carbon credit scheme, the Government of Jersey must combine their aim of seagrass restoration with the removal of pressures (i.e. through designation of a Marine Park) to claim carbon credits. Tackling the climate emergency by using nature-based solutions that also address the biodiversity crisis provides multiple benefits on land and at sea And Develop a Marine Spatial Plan Protecting the seabed and other carbon storing habitats from inappropriate development and damaging activities would cut off a major direct source of emissions and allow those carbon stores to rebuild..." – Blue Marine Foundation*

## Survey responses

There were no specific questions in the survey relating to policy EN5 - Blue Carbon, biodiversity and sequestration but local projects to support biodiversity and sequestration including blue carbon were popular. There were 11 of comments relating to trees – planting, maintaining and protecting them.

*"Tree planting and investment in land to plant local woodland should be part of the plan."*

*"...a great way to reduce carbon levels is to plant more trees. Lots of them! Too many are being cut down, which is detrimental to the biodiversity of the Island."*

Although not widely commented on, there were 8 comments on blue carbon:

*"I was pleased to see marine carbon is being seriously studied, this will no doubt lead to difficult political decisions on international stage. I hope Jersey has the courage to stand firm if it finds a science backed plan to restore our sea grasses and marine environment."*

*"Put in place as many marine reserves as possible, and police them properly. It has been proved that marine reserves can be very successful in preserving and increasing fish stocks, and in providing places where sea grass can thrive to assist in reducing CO<sub>2</sub>."*

## Social media comments

There were not many comments regarding policy EN6 on any of the social media channels:

*"Jersey has an opportunity to increase their soil carbon levels, which would result in lower levels of atmospheric CO<sub>2</sub>e, an increase in water-holding capacity, aggregate stability, water infiltration and better resilience to impacts of climate change as additional benefits. The withdrawal of subsidies damaging Jersey's soil health would enable soil organic carbon levels to improve."*



71% of those who took part in a poll on Government of Jersey's Instagram story supported the statement: The draft Roadmap suggests doubling Jersey's sea grass beds and using nature-based solutions to tackle the climate emergency and biodiversity crisis.

However, in response to some of the more general social media posts it was clear people want to see nature-based solutions as part of the response to tackling the climate emergency

*"...plant more trees..."*

## Summary

Policy EN5 - Blue Carbon, biodiversity and sequestration was a well-received policy. Islanders are in agreement that they wish to see nature-based solutions as part of the response to tackling the climate emergency. The co-benefits from this policy were valued and considered to be of importance.

## 5.34 EN6 - Carbon offsets

The responses regarding this policy can be found in strategic policy 5: Becoming carbon neutral

## 5.35 Strategic policy 5: Becoming carbon neutral

Strategic policy 1 explains the pathway to net-zero. The question about whether Jersey should become carbon neutral remains open. It is recognised that buying offsets will be probably be a part of Jersey's pathway to net-zero. But, buying offsets will certainly be needed if we choose to become carbon neutral early, for example 2030. Policy EN6 - Carbon offsets sets out how this could be achieved.

## Written submissions

Written submissions recognise that strategic policy 1 commits Jersey to a science-led emissions trajectory and that becoming carbon neutral in 2030 (or at a different date) remains a legitimate step in becoming net-zero. Thoughts around the date at which Jersey should buy offsets was mixed. However, there was a general consensus that supporting local sequestration projects was a vital part of the journey to becoming net-zero.

*...Jersey should be investing in offsets as soon as possible to minimise initial cost and encourage early growth and establishment of (rain)forests. If the policies outlined within the draft CNR are successful in reducing Jersey's carbon emissions, costs associated with carbon offsets should only reduce over time. It is worrying that GoJ have not made an official policy on carbon offsets. DWCT is concerned that the decision to review and produce a carbon offset framework in 2025, along with the decision on becoming carbon neutral to be taken by 2028 is too late. This demonstrates lack of urgency and resources to deliver such a review amongst the many other priorities outlined in the CNR..." - **Durrell Wildlife Conservation Trust***



*"I welcome the commitment to local reduction and sequestration projects before the purchase of off-Island offsets and feel that there is enormous scope for both terrestrial and marine sequestrations, which will also tackle the biodiversity crisis at the same time." - **The Good Jersey Life***

*"...Reform Jersey is committed to ensuring that Jersey plays its part in addressing the climate change crisis. The target for carbon neutrality by 2030 was originally set by the States Assembly decision to adopt P.27/2019... We owe it to future generations to ensure that this target is met and we create for them an environment in which they can thrive, protected by the resilience provided by ensuring we are prepared for the challenges of the future." - **Reform Jersey***

*"We believe the estimated £2.5m -£5m for carbon offsets could be better used on reducing the root cause of emissions within the Island. This will also benefit the local economy. We believe offsets should only be considered when other emission abatement interventions have been exhausted and not used as a substitute." - **Jersey Electricity***

*"With the [States] Assembly having taken a decision on a target date for Carbon Neutrality (circa 2030)...we are generally supportive of where we now are, and the clear direction of travel set out in the Draft Roadmap. The Forum also recognises that in short term, fast pace and bold leadership in respect of the on-Island carbon abatement is the clear priority with the option remaining open for the Island to choose to buy offsets, despite the issues and complexity surrounding these, in order to be carbon neutral by whatever final date is agreed. Carbon Neutral by 2030 is therefore something that can be considered over the next few years once we have established the initial trajectory of on-Island progress which is key." - **Jersey Chamber of Commerce***

*"As a group, we understand that at the moment, carbon offsets will need to be involved in reaching a carbon neutral status, however we hope that more focus will be placed on direct actions to reduce emissions, therefore decreasing the amount of offsets that will need to be purchased. This is because we feel that it is important to do as much as we can to reduce our emissions before turning to other methods. Indeed, we hope that in the future, the need for carbon offsetting will be completely eliminated." - **Jersey Youth Parliament***

*"...it is also absolutely crucial that Jersey's Government is able to convey a positive vision for this strategy which illustrates the myriad of additional environmental benefits to be secured including cleaner water and air, better health, eradication of fuel poverty, restoration of biodiversity, increased leisure opportunities, reputational enhancement and reduction in road noise to name just a few. Hopefully this will help to illustrate that the required investment is not solely about reaching carbon neutrality, which some will consider to be an intangible and meaningless target, but rather investing and improving our Island's environmental infrastructure for both this generation and those who follow on." - **The National Trust for Jersey***

## Individual submissions responses

Individual submission from 906 ([Appendix 13.6](#)) suggested that policy stance on the off-setting market was dated.



*"It will not be possible to reduce carbon emissions to zero by 2030, but carbon offsets offer a viable way forward for governments seeking to achieve carbon neutrality, i.e., when combined with carbon reduction measures. It is entirely right that we should 'require high standards in the use of carbon offsetting... but in my view the Council of Ministers is taking an unduly negative view of the current state of the carbon offset market. This market is now well-established on an international level, and we need to invest in off-Island offsets at an early stage as well as on-Island.'" – 906*

## Survey responses

Strategic policies 1 and 5 have caused some confusion to respondents of the survey. It was widely believed that aligning to the Paris Agreement changed the date for carbon neutrality from 2030 to 2050. It was not understood that these are two different terms and that becoming carbon neutral by 2030 was an option explained in strategic policy 5.

*"Please do this sooner than 2030. We should lead the world and start early. Jersey is largely a middle-class population who can afford to adopt these changes early."*

As outlined in [section 5.1](#) the responses to Question 6 of the survey demonstrated a strong support for the Paris Agreement (78.1% were either supportive or very supportive). However, in the free text questions it was evident that many respondents felt confused by 2050 and 2030.

*"I strongly disagree with the Council of Minister's decision to water down the decision of the States Assembly in May 2019 that 'Jersey should aim to be carbon neutral by 2030'. The revised new target of 2050 is too far away, given the urgency and extent of the climate crisis, and as an Island we need to aim for 2030, in line with the decision of the States. This means that the actions and timescales in the draft Roadmap need to be reviewed prior to it being brought to the States Assembly for approval, i.e., with the aim of bringing the deadline back to the agreed date of 2030."*

*"Personally, I think we need far more ambition than 2050, and will be asking my representatives when they/I have the chance to be backing the 2030 'option' to be carbon neutral by that date..."*

Despite the confusion over net-zero and carbon neutral respondents shared mixed views on buying carbon offsets.

*"...It will not be possible to reduce carbon emissions to zero by 2030, but carbon offsets offer a viable way forward for governments seeking to achieve carbon neutrality, i.e., when combined with carbon reduction measures. It is entirely right that we should 'require high standards in the use of carbon offsetting', as stated on page 33 of the Roadmap, but in my view the Council of Ministers is taking an unduly negative view of the current state of the carbon offset market. This market is now well-established on an international level, and we need to invest in off-Island offsets at an early stage as well as on-Island...."*

*"...don't rely on buying carbon offsets as a way to balance the books."*



*"...Offsets are just more smoke and mirrors enabling people and governments to shirk their responsibilities. Net zero and carbon neutrality are just today's buzzwords for making it someone else's problem."*

Supporting local sequestration was seen as preferable of off-setting. There were many comments relating to preserving, planting and protecting trees and improving biodiversity and natural habitats:

*"A great way to reduce carbon levels is to plant more trees. Lots of them! Too many are being cut down, which is detrimental to the biodiversity of the Island."*

*"Blue carbon should be utilized more. Algae planting for sequestration"*

It was widely felt that there needed to be more information:

*"Carbon sequestration and effective recording of this is important to give a true picture of the Island's carbon footprint."*

## Summary

Strategic policies 1 and 5 have caused some confusion to respondents of the consultation. This was especially evident in sessions with those at the lower levels of the Engagement Pyramid.

*"Stop increasing the date, Was 2030 now 2050 what will it be next week." – Survey respondent*

There was a common misconception that by aligning to the Paris Agreement (net-zero by 2050 with interim targets in 2030 and 2035), Jersey had made a decision to defer becoming carbon neutral until 2050.

However, local sequestration was very positively received, and the co-benefits widely acknowledged.

## 5.36 The draft Carbon Neutral Roadmap

It was evident that from the responses that many who engaged in the consultation had not read the entire draft Carbon Neutral Roadmap. For example, there were responses making recommendations for policies that were already included in the draft Carbon Neutral Roadmap. As expected, this was more common at the lower levels within the engagement pyramid and less evident at the higher levels. Some higher-level responses focused on a specific set of issues that were pertinent to their organisation.

Feedback for the roadmap was mainly positive across all channels, but that there was potential to do more.



## Written submissions

*"We as the Youth Parliament of Jersey believe that the policies will go a long way towards reaching our goals, and we have no new policies to suggest (except for the pedestrianisation of town), however a large number of the policies need to be more ambitious. In this climate crisis, we need to do everything we can. These policies are good and great steps to take, but they aren't quite there yet." – Jersey Youth Parliament*

*"C4J is broadly supportive of the policy objectives and signalling of the CNR..." - Cycle 4 Jersey*

## Individual submissions

*"The Carbon Neutral Roadmap is a welcome piece of policy for Jersey. All other government policy and proposals should be measured against their contribution to implementing the carbon neutral strategy. The Roadmap must be more ambitious. there is no reason that Jersey cannot 'lead the way' in efforts to decarbonise." - 911*

*"A good and helpful document but given that Government have always been much better at Planning than implementation, we must await the proof of the pudding" - 903*

## Survey

78% of survey respondents were supportive or very supportive for the need for a Carbon Neutral Roadmap for Jersey.

*"A really important step in Jersey playing it's part in tackling the global climate emergency."*

*"Really happy that we are getting on with this. Climate Change is the most important challenge of our generation. We have an opportunity to become world leaders in the green revolution and to create hundreds or thousands of new green tech jobs. Very excited to see it coming together not just for us but also for our children"*

## 5.37 Other issues

Other issues not addressed elsewhere in the draft Carbon Neutral Roadmap:

The issue of population was raised a number of times.

*"Stop population increases and you stop the increase in our carbon footprint." – Survey respondent*



*"The Island is also way too over-populated - we need a better immigration policy before we get to levels of standing-room only" – **Survey respondent***

*"Start With Population Control this will help Climate Change" – **Social media comment***

*"We need a policy of taking in our share of those made homeless by the climate. Also to financially support them" – **Survey respondent***



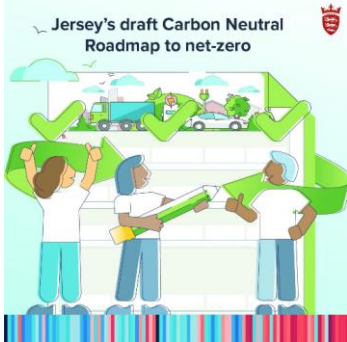
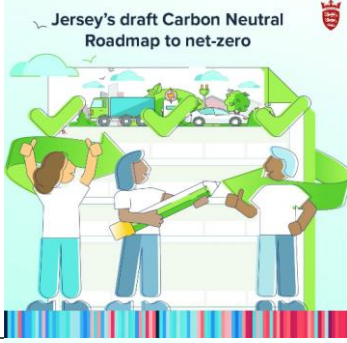



## 6. Appendices

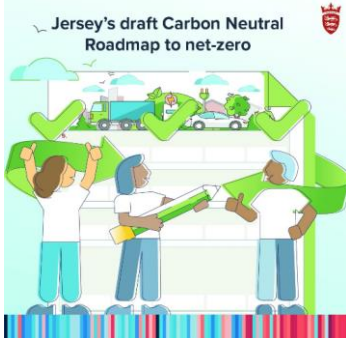
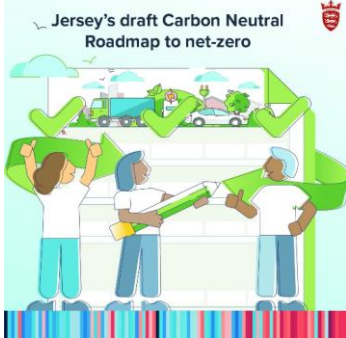
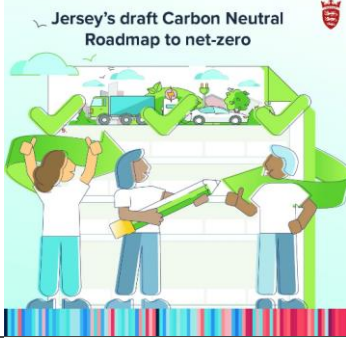

### Appendix 1: Social media posts

This table shows the posts which were published relating to the draft Carbon Neutral Roadmap consultation, on both Government of Jersey and Jersey's Climate Conversation channels. The table posts their analytics, including reach, engagement and impressions.


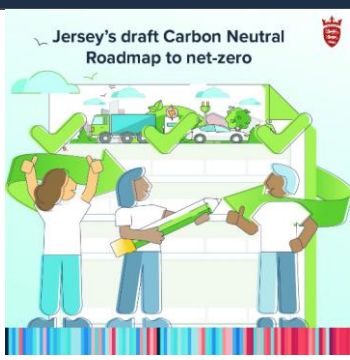



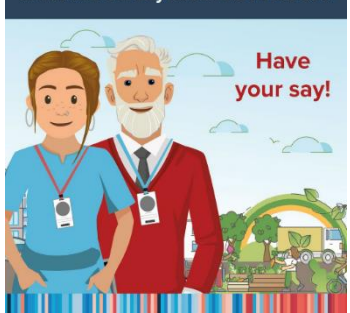
- **reach:** The number of people who saw your post at least once. Reach is different from impressions, which may include multiple views of your post by the same people. This metric is estimated
- **engagement:** The number of reactions, comments, shares, and clicks on your post
- **impressions:** The total number of times your post has been seen.

Post text	Post image	Engagement	Social media channel
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your question and take part in the discussion on how Jersey will reach net-zero by 2050. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a>		<b>Reach:</b> 10,481 <b>Engagement:</b> 156 <b>Impressions:</b> 10,708	Government of Jersey Facebook
We're proposing subsidies to help Islanders switch from petrol/diesel to an electric car, and financial support for the move away from fossil fuel boilers. Take a look at the full list of policies in the draft Carbon Neutral Roadmap and have your say: <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Reach:</b> 14,206 <b>Engagement:</b> 1,049 <b>Impressions:</b> 104,453	Government of Jersey Facebook
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your question and take part in the discussion on how Jersey will reach net-zero by 2050.		<b>Reach:</b> 9,411 <b>Engagement:</b> 65 <b>Impressions:</b> 9,883	Government of Jersey Facebook

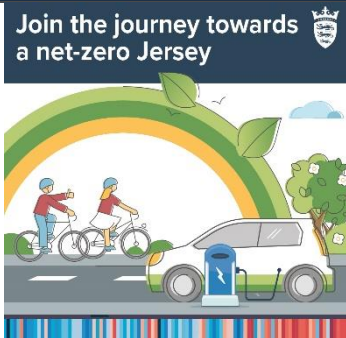
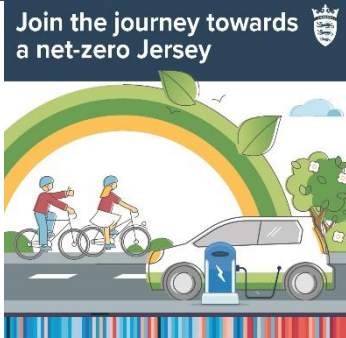

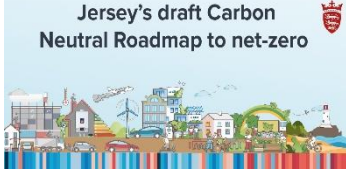
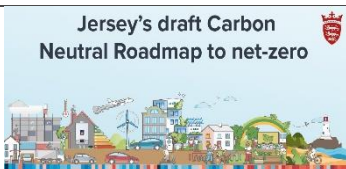



Post text	Post image	Engagement	Social media channel
<p>Tomorrow is our live online consultation session on Jersey's draft Carbon Neutral Roadmap. This is an opportunity to take part in the discussion on how Jersey will reach net-zero by 2050 and how the proposed policies will impact you. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a></p>		<p><b>Reach:</b> 8,416 <b>Engagement:</b> 80 <b>Impressions:</b> 8,838</p>	Government of Jersey Facebook
<p>We're proposing subsidies to help Islanders switch from petrol/diesel to an electric car, and financial support for the move away from fossil fuel boilers. Take a look at the full list of policies in the draft Carbon Neutral Roadmap and have your say <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a></p>		<p><b>Engagement:</b> 9 <b>Impressions:</b> 2,245</p>	Government of Jersey Instagram
<p>The draft Carbon Neutral Roadmap sets out how Jersey can tackle the climate emergency on a path towards a net-zero future. It includes: 🚗 Subsidies for buying electric vehicles 🏠 Support for switching heating methods Take part in the consultation at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a></p>		<p><b>Engagement:</b> 6 <b>Impressions:</b> 1,592</p>	Government of Jersey Instagram
<p>Have your say on the plans set out to reach net-zero in Jersey, proposed in the draft Carbon Neutral Roadmap. 🇯🇪 The feedback you give will be reviewed and published as part of the Carbon Neutral Roadmap and lodged for debate by the States Assembly in 2022. To have your say on the future of Jersey's climate, go to <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a> or visit your parish hall to fill in the consultation. 📝 You can also take part in our online consultation on 6 January 📅 <a href="https://bit.ly/3sv7Kir">https://bit.ly/3sv7Kir</a></p>		<p><b>Reach:</b> 257 <b>Engagement:</b> 1 <b>Impressions:</b> 264</p>	Jersey's Climate Conversation Facebook



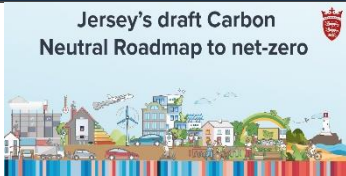
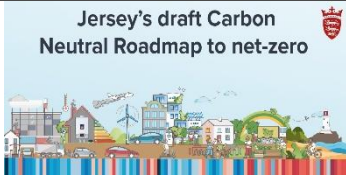

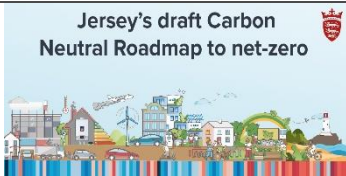
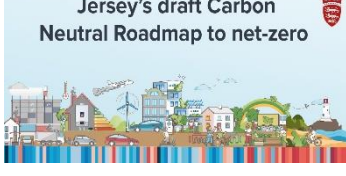
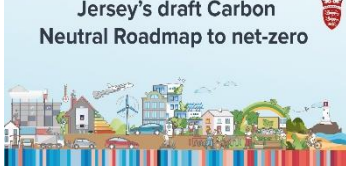
Post text	Post image	Engagement	Social media channel
Have your say on the plans set out to reach net-zero in Jersey, proposed in the draft Carbon Neutral Roadmap. JE The feedback you give will be reviewed and published as part of the Carbon Neutral Roadmap and lodged for debate by the States Assembly in 2022. To have your say on the future of Jersey's climate, visit the draft Carbon Neutral Roadmap link in our bio, or visit your parish hall to fill in the consultation. 		Reach: 179 Engagement: 12 Impressions: 192	Jersey's Climate Conversation Instagram
There's less than a week left to have your say on the proposed plans to tackle Jersey's climate emergency. We're aiming to make on-Island solid waste disposal net-zero by 2040. The consultation on the draft Carbon Neutral Roadmap closes on Monday. Give us your views at <a href="http://gov.je/consultations">gov.je/consultations</a>		Reach: 19,265 Engagement: 1,217 Impressions: 120,459	Government of Jersey Facebook
There's less than a week left to have your say on the proposed plans to tackle Jersey's climate emergency. We're aiming to make on-Island solid waste disposal net-zero by 2040. Have your say on the draft Carbon Neutral Roadmap before the deadline at <a href="http://gov.je/consultations">http://gov.je/consultations</a>		Clicks: 12 Engagement: 50 Impressions: 2,412	Government of Jersey Twitter
Theres less than a week left to have your say on the proposed plans to tackle Jersey's cliamte emergency. We're aiming to make on-Island solid waste net-zero by 2040. The consultation on the draft Carbon Neutral Roadmap closes on Monday. Give us your views at <a href="http://gov.je/consultations">gov.je/consultations</a>		Engagement: 11 Impressions: 505	Government of Jersey LinkedIn
What would help you make lifestyle choices to positively impact the environment in Jersey? Policies setting out how Jersey can reduce its carbon emissions on a pathway to net-zero have been laid out in the draft Carbon Neutral Roadmap. We want your views on the proposals for tackling the climate emergency by taking part in the consultation: <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		Reach: 186 Engagement: 8 Impressions: 195	Jersey's Climate Conversation Instagram





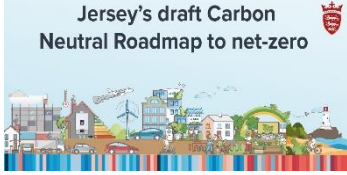






Post text	Post image	Engagement	Social media channel
Jersey has set out proposed actions and incentives to reduce CO2 emissions. Would a 32ppl subsidy encourage you to switch from diesel to renewable diesel? We want your views to tell us what you think. Don't miss this opportunity to help change the way we all travel. Visit <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Reach:</b> 366 <b>Engagement:</b> 9 <b>Impressions:</b> 366	Jersey's Climate Conversation Facebook
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		<b>Reach:</b> 256 <b>Engagement:</b> 0 <b>Impressions:</b> 258	Jersey's Climate Conversation Facebook
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a> , or click on the link in our bio!		<b>Reach:</b> 89 <b>Engagement:</b> 7 <b>Impressions:</b> 97	Jersey's Climate Conversation Instagram
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your question and take part in the discussion on how Jersey will reach net-zero by 2050. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a>		<b>Engagement:</b> 41 <b>Impressions:</b> 4,618 <b>Clicks:</b> 2	Government of Jersey Twitter
We're proposing subsidies to help Islanders switch from petrol/diesel to an electric car, and financial support for the move away from fossil fuel boilers. Take a look at the full list of policies in the draft Carbon Neutral Roadmap and have your say <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 238 <b>Impressions:</b> 4,365 <b>Clicks:</b> 123	Government of Jersey Twitter
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your question and take part in the discussion on how Jersey will reach net-zero by 2050. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a>		<b>Engagement:</b> 90 <b>Impressions:</b> 4,035 <b>Clicks:</b> 20	Government of Jersey Twitter





Post text	Post image	Engagement	Social media channel
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your question and take part in the discussion on how Jersey will reach net-zero by 2050. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a>		<b>Engagement:</b> 57 <b>Impressions:</b> 3,110 <b>Clicks:</b> 16	Government of Jersey Twitter
The Carbon Neutral Roadmap sets out how Jersey can reach net-zero emissions by 2050. The plans include support to help Islanders move away from fossil fuel boilers and incentives to scrap the most polluting vehicles. Have your say on the proposals at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 1 <b>Impressions:</b> 391	Government of Jersey LinkedIn
Tomorrow is our live consultation session on Jersey's draft Carbon Neutral Roadmap. This is an opportunity to ask your questions and take part in the discussion on how Jersey will reach net-zero by 2050. Sign up here: <a href="http://bit.ly/3Enw48f">http://bit.ly/3Enw48f</a>		<b>Engagement:</b> 10 <b>Impressions:</b> 319	Government of Jersey LinkedIn
Join our live consultation session on Jersey's draft Carbon Neutral Roadmap on Thursday 6 Jan. An opportunity to ask your questions and take part in the discussion on how Jersey will reach net-zero by 2050.		<b>Engagement:</b> 10 <b>Impressions:</b> 551	Government of Jersey LinkedIn
We're proposing subsidies to help Islanders switch from petrol / diesel to an electric car and financial support for the move away from fossil fuel boilers. Take a look at the full list of policies in the draft Carbon Neutral Roadmap and have your say at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 67 <b>Impressions:</b> 1,731	Government of Jersey LinkedIn
What would help you make lifestyle choices to positively impact the environment in Jersey? Policies setting out how Jersey can reduce its carbon emissions on a pathway to net-zero have been laid out in the draft Carbon Neutral Roadmap. We want your views on the proposals for tackling the climate emergency by taking part in the consultation here: <a href="http://bit.ly/3E4himA">http://bit.ly/3E4himA</a> . Watch the Carbon Neutral Roadmap animation here: <a href="http://bit.ly/3Eo9hJD">http://bit.ly/3Eo9hJD</a>		<b>Engagement:</b> 10 <b>Impressions:</b> 319	Government of Jersey LinkedIn



Post text	Post image	Engagement	Social media channel
Have your say on the plans to tackle climate change, proposed in the draft Carbon Neutral Roadmap. The Roadmap sets out policies for Jersey to become net-zero by 2050. Have your say  <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a> Take part in an online consultation session  <a href="https://bit.ly/3sv7Kir">https://bit.ly/3sv7Kir</a>		<b>Engagement:</b> 17 <b>Impressions:</b> 918	Jersey's Climate Conversation Twitter
Have your say on the plans set out to reach net-zero in Jersey, proposed in the draft Carbon Neutral Roadmap.  The feedback you give will be reviewed and published as part of the Carbon Neutral Roadmap and lodged for debate by the States Assembly in 2022. To have your say on the future of Jersey's climate, go to <a href="https://lnkd.in/egk2Kn9k">https://lnkd.in/egk2Kn9k</a> or visit your parish hall to fill in the consultation. You can also take part in our online consultation on 6 January, sign up below  <a href="https://bit.ly/3sv7Kir">https://bit.ly/3sv7Kir</a>		<b>Engagement:</b> 17 <b>Impressions:</b> 918	Jersey's Climate Conversation LinkedIn
The draft Carbon Neutral Roadmap sets out how Jersey can tackle the climate emergency and reach net-zero emissions by 2050. Among the plans are a series of subsidies and incentives to encourage changes in the way we travel and heat our homes in the Island. The consultation is open until 31 January. Have your say at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Reach:</b> 5,925 <b>Engagement:</b> 294 <b>Impressions:</b> 5,992	Government of Jersey Facebook
"The draft Carbon Neutral Roadmap sets out how Jersey can tackle the climate emergency and reach net-zero emissions by 2050. The consultation is open until 31 January. Have your say at <a href="http://gov.je/consultations">http://gov.je/consultations</a> "		<b>Clicks:</b> 16 <b>Engagement:</b> 257 <b>Impressions:</b> 3,110	Government of Jersey Twitter
The draft Carbon Neutral Roadmap sets out how Jersey can tackle the climate emergency and reach net-zero emissions by 2050. The deadline to have your say is tomorrow! Share your feedback at <a href="http://gov.je/consultations">http://gov.je/consultations</a>		<b>Clicks:</b> 13 <b>Engagement:</b> 54 <b>Impressions:</b> 2,702	Government of Jersey Twitter

<sup>27</sup> The video from the Minister for the Environment can be watched in full here:  
[https://www.facebook.com/150089998513274/posts/1892359827619607/?comment\\_id=1892388120950111](https://www.facebook.com/150089998513274/posts/1892359827619607/?comment_id=1892388120950111)








Post text	Post image	Engagement	Social media channel
The Government of Jersey pledges to put children first in our response to tackling the climate emergency. Improving climate education and learning are vital in our efforts to tackling climate change. Policy EN4 in the draft Carbon Neutral Roadmap states that the "Government of Jersey will deliver the COP26 education pledge by embedding high quality climate education into education and learning". Have your say on this policy, and others by visiting the Carbon Neutral Roadmap link in our bio		<b>Reach:</b> 263 <b>Engagement:</b> 18 <b>Impressions:</b> 286	Jersey's Climate Conversation Instagram
We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. How will it impact you? Take 5 minutes and tell us what you think about the changes. The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. Tell us what you think, visit <a href="https://bit.ly/3eTso3R">https://bit.ly/3eTso3R</a>		<b>Reach:</b> 24,473 <b>Engagement:</b> 2,550 <b>Impressions:</b> 24,836	Government of Jersey Facebook
We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. How will it impact you? Take 5 minutes and tell us what you think about the changes: <a href="https://bit.ly/3eTso3R">https://bit.ly/3eTso3R</a>		<b>Clicks:</b> 82 <b>Engagement:</b> 221 <b>Impressions:</b> 4,279	Government of Jersey Twitter
The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. How will it impact you? We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. 🚗🚚 Complete the survey to tell us what you think about the changes ➡️ <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		<b>Reach:</b> 350 <b>Engagement:</b> 8 <b>Impressions:</b> 359	Jersey's Climate Conversation Facebook
The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. How will it impact you? We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. 🚗🚚 Tell us what you think ➡️ <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 20 <b>Impressions:</b> 529	Jersey's Climate Conversation Twitter











Post text	Post image	Engagement	Social media channel
We want your views on the proposed actions and incentives to get Islanders out of their petrol and deisel vehicles. How will it impact you? Take 5 minutes and tell us what you think about the changes. The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. Tell us what you think, visit <a href="http://bit.ly/3eTso3R">http://bit.ly/3eTso3R</a>	An illustration of a red car with smoke coming out of its tailpipe, set against a dark blue background with a crown icon in the top right corner.	<b>Engagement:</b> 12 <b>Impressions:</b> 863	Jersey's Climate Conversation Twitter
The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. How will it impact you? We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. 🚗🚌 Complete the survey to tell us what you think about the changes, find the link in our bio.	An illustration of a red car with smoke coming out of its tailpipe, set against a dark blue background with a crown icon in the top right corner.	<b>Reach:</b> 309 <b>Engagement:</b> 29 <b>Impressions:</b> 325	Jersey's Climate Conversation Instagram
We're proposing financial support to help Islanders make the switch from petrol and disel vehicles to electric ones. We want your views on how the new actions and incentives in the draft Carbon Neutral Roadmap will impact you. Take part in the consultation at <a href="http://gov.je/consultations">gov.je/consultations</a>	An illustration of a red electric car parked next to a charging station, set against a dark blue background with a crown icon in the top right corner.	<b>Engagement:</b> 506 <b>Impressions:</b> 6,496	Government of Jersey LinkedIn
Transport is Jersey's largest source of greenhouse gas emissions. Policy TR3 (page 85 of the draft Carbon Neutral Roadmap) supports transition fuels, by providing subsidies for renewable diesel, by 32 pence per litre until 2026. We want your views on our draft Carbon Neutral Roadmap. Don't miss this opportunity to help change the way we all travel. Visit <a href="http://gov.je/consultations">gov.je/consultations</a>	An illustration of a blue car parked next to a charging station, set against a dark blue background with a crown icon in the top right corner.	<b>Reach:</b> 16,732 <b>Engagement:</b> 798 <b>Impressions:</b> 17,477	Government of Jersey Facebook
Transport is Jersey's largest source of greenhouse gas emissions. Policy TR3 (page 85 of the draft Carbon Neutral Roadmap) supports transition fuels, by providing subsidies for renewable diesel, by 32 pence per litre until 2026. Have your say at <a href="http://gov.je/consultations">http://gov.je/consultations</a>	An illustration of a blue car parked next to a charging station, set against a dark blue background with a crown icon in the top right corner.	<b>Clicks:</b> 7 <b>Engagement:</b> 47 <b>Impressions:</b> 2,513	Government of Jersey Twitter




Post text	Post image	Engagement	Social media channel
Transport is Jersey's largest source of greenhouse gas emissions. Policy TR3 (page 85 of the draft Carbon Neutral Roadmap) supports transition fuels, by providing subsidies for renewable diesel, by 32 pence per litre until 2026. We want your views on our draft Carbon Neutral Roadmap. Don't miss this opportunity to help change the way we all travel. Visit <a href="http://gov.je/consultations">gov.je/consultations</a>	<b>Would renewable diesel subsidies help you switch?</b> 	<b>Engagement:</b> 19 <b>Impressions:</b> 713	Government of Jersey LinkedIn
Policy TR9 in the draft Carbon Neutral Roadmap outlines the need for a bus development plan. 🚌 How do you think the bus service could be improved? What would make you get the bus more? Let us know my completing the survey 👍 <a href="https://bit.ly/3Ft7IKE">https://bit.ly/3Ft7IKE</a>	<b>What would get you out the car and on the bus?</b> 	<b>Reach:</b> 384 <b>Engagement:</b> 10 <b>Impressions:</b> 384	Jersey's Climate Conversation Facebook
Policy TR9 in the draft Carbon Neutral Roadmap outlines the need for a bus development plan. 🚌 How do you think the bus service could be improved? What would make you get the bus more? Let us know my completing the survey (link in bio)	<b>What would get you out the car and on the bus?</b> 	<b>Reach:</b> 255 <b>Engagement:</b> 21 <b>Impressions:</b> 267	Jersey's Climate Conversation Instagram
Transport contributes to 44% of Jersey's greenhouse gas emissions! To become net-zero by 2050, we need to phase out the use of nearly all petrol and diesel vehicles. We want your views on our draft Carbon Neutral Roadmap. Don't miss this opportunity to help change the way we all travel. Visit <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>	<b>Transport is Jersey's largest source of carbon emissions</b> 	<b>Reach:</b> 397 <b>Engagement:</b> 2 <b>Impressions:</b> 404	Jersey's Climate Conversation Facebook
Transport contributes to 44% of Jersey's greenhouse gas emissions! To become net-zero by 2050, we need to phase out the use of nearly all petrol and diesel vehicles. We want your views on our draft Carbon Neutral Roadmap. Don't miss this opportunity to help change the way we all travel. Visit the 'draft Carbon Neutral Roadmap' link in our bio.	<b>Transport is Jersey's largest source of carbon emissions</b> 	<b>Reach:</b> 174 <b>Engagement:</b> 14 <b>Impressions:</b> 181	Jersey's Climate Conversation Instagram



Post text	Post image	Engagement	Social media channel
"Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://gov.je/Consultations">http://gov.je/Consultations</a> "		<b>Clicks:</b> 23 <b>Impressions:</b> 3,754 <b>Engagement:</b> 113	Government of Jersey Twitter
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://gov.je/Consultations">gov.je/Consultations</a>		<b>Impressions:</b> 426	Government of Jersey LinkedIn
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 19 <b>Impressions:</b> 669	Jersey's Climate Conversation Twitter
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="https://lnkd.in/egk2Kn9k">https://lnkd.in/egk2Kn9k</a>		<b>Engagement:</b> 1 <b>Impressions:</b> 32	Jersey's Climate Conversation LinkedIn
Today is your last chance to have your say on how we tackle the climate emergency. Make sure you give us your views on the draft Carbon Neutral Roadmap proposals and how they could impact you. Go to <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 19 <b>Impressions:</b> 2,429	Government of Jersey Instagram
Don't miss your opportunity to have your say on the proposed plans to reach net-zero in Jersey by 2050. Carbon emissions are created around the world to make the goods we import into Jersey. To help tackle the climate emergency, we need to reduce the emissions produced by other countries on our behalf. Take 5 minutes and give us your views at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 25 <b>Impressions:</b> 2,303	Government of Jersey Instagram





Post text	Post image	Engagement	Social media channel
Transport is Jersey's largest source of greenhouse gas emissions. Policy TR3 (page 85 of the draft Carbon Neutral Roadmap) supports transition fuels, by providing subsidies for renewable diesel, by 32 pence per litre until 2026. We want your views on our draft Carbon Neutral Roadmap. Don't miss this opportunity to help change the way we all travel. Visit <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 9 <b>Impressions:</b> 1,983	Government of Jersey Instagram
We want your views on the proposed actions and incentives to get Islanders out of their petrol and diesel vehicles. How will it impact you? Take 5 minutes and tell us what you think about the changes. The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050. Tell us what you think at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 39 <b>Impressions:</b> 4,394	Government of Jersey Instagram
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you prepare for the change, we're suggesting subsidies for new heating systems. Tell us what you think of the proposals at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Reach:</b> 125,280 <b>Engagement:</b> 2,649 <b>Impressions:</b> 25,558	Government of Jersey Facebook
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you get set for the change, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Clicks:</b> 21 <b>Engagement:</b> 86 <b>Impressions:</b> 2,865	Government of Jersey Twitter
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you get set for the change, we're suggesting subsidies for new heating systems. Tell us what you think of the proposals at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 44 <b>Impressions:</b> 1,336	Government of Jersey LinkedIn
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you get set for the change, we're suggesting subsidies for new heating systems. Tell us what you think <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 105 <b>Impressions:</b> 105	Jersey's Climate Conversation Twitter






Post text	Post image	Engagement	Social media channel
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you get set for the change, we're suggesting subsidies for new heating systems. Tell us what you think of the proposals by visiting the draft Carbon Neutral Roadmap link in our bio ❤️		Reach: 119 Engagement: 7 Impressions: 124	Jersey's Climate Conversation Instagram
We want your views on the plans to change the way you heat your home or business. From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install a new oil, gas or coal boiler. To help you make the switch, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		Reach: 17,212 Engagement: 769 Impressions: 17,508	Government of Jersey Facebook
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install a new oil, gas or coal boiler. To help you make the switch, we're suggesting subsidies for new heating systems. Have your say at <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		Clicks: 38 Engagement: 235 Impressions: 8,393	Government of Jersey Twitter
We want your views on the plans to change the way you heat your home or business. 🏠🏢 From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install a new oil, gas or coal boiler. To help you make the switch, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		Reach: 1,049 Engagement: 44 Impressions: 1,059	Jersey's Climate Conversation Facebook
We want your views on the plans to change the way you heat your home or business. 🏠🏢 From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install a new oil, gas or coal boiler. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		Engagement: 0 Impressions: 120	Jersey's Climate Conversation Twitter



Post text	Post image	Engagement	Social media channel
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We want your views on the plans to change the way you heat your home or business.  From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install a new oil, gas or coal boiler. To help you make the switch, we're suggesting subsidies for new heating systems. Tell us what you think, by clicking on the link in our bio!		<b>Reach:</b> 133 <b>Engagement:</b> 7 <b>Impressions:</b> 144	Jersey's Climate Conversation Instagram
Are you ready to make the change? From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Reach:</b> 16,891 <b>Engagement:</b> 1,078 <b>Impressions:</b> 17,529	Government of Jersey Facebook
From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Clicks:</b> 38 <b>Engagement:</b> 235 <b>Impressions:</b> 8,393	Government of Jersey Twitter
Are you ready to make the change? From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 7 <b>Impressions:</b> 389	Government of Jersey LinkedIn



Post text	Post image	Engagement	Social media channel
Are you ready to make the change? From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think at <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		Reach: 342 Engagement: 4 Impressions: 351	Jersey's Climate Conversation Facebook
From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think  <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		Engagement: 1 Impressions: 109	Jersey's Climate Conversation Twitter
Are you ready to make the change? From 2026, it's proposed you will no longer be able to install new oil, gas and coal boilers in your home. As part of the draft Carbon Neutral Roadmap, we're suggesting subsidies for new heating systems. Tell us what you think by visiting the draft Carbon Neutral Roadmap link in our bio and filling out the survey 		Reach: 113 Engagement: 9 Impressions: 119	Jersey's Climate Conversation Instagram
From 2026, under the draft Carbon Neutral Roadmap plans, you will not be able to install new oil, gas and coal boilers in your home. To help you get set for the change, we're suggesting subsidies for new heating systems. Tell us what you think of the proposals at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>		Engagement: 28 Impressions: 3,376	Government of Jersey Instagram
Don't miss your opportunity to have your say on the proposed plans to reach net-zero in Jersey by 2050. Carbon emissions are created around the world to make the goods we import into Jersey. To help tackle the climate emergency, we need to reduce the emissions produced by other countries on our behalf. Take 5 minutes and give us your views at <a href="http://gov.je/consultations">gov.je/consultations</a>		Reach: 14,988 Engagement: 542 Impressions: 15,329	Government of Jersey Facebook





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Don't miss your opportunity to have your say on the proposed plans to reach net-zero in Jersey by 2050. Carbon emissions are created around the world to make the goods we import into Jersey. Take 5 minutes and give us your views at <a href="http://gov.je/consultations">http://gov.je/consultations</a>		<b>Clicks:</b> 12 <b>Engagement:</b> 29 <b>Impressions:</b> 1,808	Government of Jersey Twitter
Don't miss your opportunity to have your say on the proposed plans to reach net-zero in Jersey by 2050. Carbon emissions are created around the world to make the goods we import into Jersey. To help tackle the climate emergency, we need to reduce the emissions produced by other countries on our behalf. 🌱🌿 Take 5 minutes and give us your views at <a href="http://www.gov.je/CarbonRoadmap">www.gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 2 <b>Impressions:</b> 416	Jersey Climate Conversation Facebook
Don't miss your opportunity to have your say on the proposed plans to reach net-zero in Jersey by 2050. Carbon emissions are created around the world to make the goods we import into Jersey. To help tackle the climate emergency, we need to reduce the emissions produced by other countries on our behalf. Take 5 minutes and give us your views at <a href="http://gov.je/consultations">gov.je/consultations</a>		<b>Engagement:</b> 33 <b>Impressions:</b> 645	Jersey Climate Conversation Twitter
Carbon emissions are created around the world to make the goods we import into Jersey. To help tackle the climate emergency, we need to reduce the emissions produced by other countries on our behalf. 🌱🌿 Give us your views on the proposed plans 📝 <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a>		<b>Engagement:</b> 33 <b>Impressions:</b> 645	Jersey Climate Conversation Twitter
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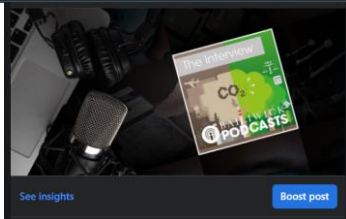
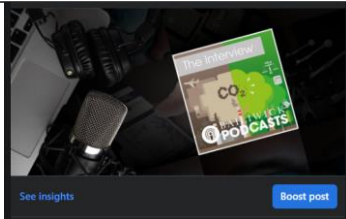


Post text	Post image	Engagement	Social media channel
A new carbon neutral alliance will look after a £500,000 Climate Action Fund to support grassroots projects to tackle the climate emergency. Tell us what you think about this! <a href="http://www.gov.je/carbonroadmap">http://www.gov.je/carbonroadmap</a>		Reach: 342 Engagement: 6 Impressions: 348	Jersey Climate Conversation Facebook
A new carbon neutral alliance will look after a £500,000 Climate Action Fund to support grassroots projects to tackle the climate emergency. Tell us what you think about this! <a href="http://gov.je/carbonroadmap">http://gov.je/carbonroadmap</a>		Engagement: 10 Impressions: 162	Jersey Climate Conversation Twitter
A new carbon neutral alliance will look after a £500,000 Climate Action Fund to support grassroots projects to tackle the climate emergency. Tell us what you think about this! <a href="https://lnkd.in/gSjWqJm5">https://lnkd.in/gSjWqJm5</a>		Engagement: 1 Impressions: 40	Jersey Climate Conversation LinkedIn
A new carbon neutral alliance will look after a £500,000 Climate Action Fund to support grassroots projects to tackle the climate emergency. Tell us what you think about this! Click on the draft Carbon Neutral Roadmap link in our bio.		Reach: 206 Engagement: 15 Impressions: 219	Jersey's Climate Conversation Instagram
We're all going to change how we live our lives and that includes the food we eat. Have you already made a change to your diet for environmental reasons? Tell us what you think about this 🍴 <a href="http://gov.je/carbonroadmap">http://gov.je/carbonroadmap</a>		Engagement: 3 Impressions: 127	Jersey's Climate Conversation Twitter
We're all going to change how we live our lives and that includes the food we eat. Have you already made a change to your diet for environmental reasons? Tell us what you think about this 🍴 <a href="http://www.gov.je/carbonroadmap">http://www.gov.je/carbonroadmap</a>		Reach: 391 Engagement: 3 Impressions: 391	Jersey's Climate Conversation Facebook



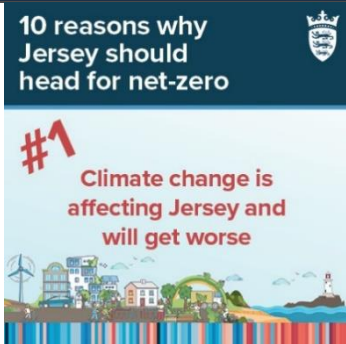


Post text	Post image	Engagement	Social media channel
Becoming net-zero by 2050 will need new jobs and some people will need to learn new skills. 🧩🚗👤 Tell us what you think! <a href="http://www.gov.je/carbonroadmap">http://www.gov.je/carbonroadmap</a>	 Climate Emergency JSY	Reach: 446 Engagement: 7 Impressions: 447	Jersey's Climate Conversation Facebook
Becoming net-zero by 2050 will need new jobs and some people will need to learn new skills. 🧩🚗👤 Tell us what you think! <a href="http://gov.je/carbonroadmap">http://gov.je/carbonroadmap</a>	 Climate Emergency JSY	Reach: 446 Engagement: 7 Impressions: 447	Jersey's Climate Conversation Twitter
Becoming net-zero by 2050 will need new jobs and some people will need to learn new skills. 🧩🚗👤 Tell us what you think! <a href="https://lnkd.in/gSjWqJm5">https://lnkd.in/gSjWqJm5</a>	 Climate Emergency JSY	Engagement: 3 Impressions: 50	Jersey's Climate Conversation LinkedIn
Becoming net-zero by 2050 will need new jobs and some people will need to learn new skills. 🧩🚗👤 Tell us what you think! You can find the survey on the draft Carbon Neutral Roadmap link in our bio.	 Climate Emergency JSY	Engagement: 3 Impressions: 204	Jersey's Climate Conversation Instagram
The Government of Jersey pledges to put children first in our response to tackling the climate emergency. Improving climate education and learning are vital in our efforts to tackling climate change. Policy EN4 in the draft Carbon Neutral Roadmap states that the "Government of Jersey will deliver the COP26 education pledge by embedding high quality climate education into education and learning". Have your say on this policy, and others at <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>	 Climate Emergency JSY	Reach: 281 Engagement: 6 Impressions: 288	Jersey's Climate Conversation Facebook



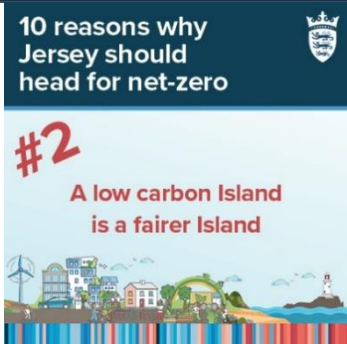


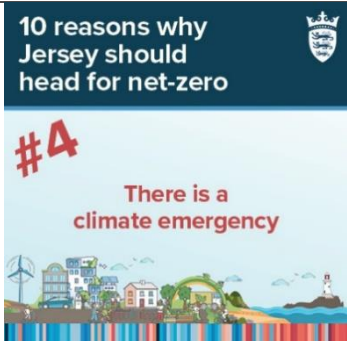


Post text	Post image	Engagement	Social media channel
<p>In this podcast, Steve Skelton, Director of Strategy and Innovation, explains the draft Carbon Neutral Roadmap - a key document that sets out how Jersey will reduce its carbon emissions to net-zero by 2050. Listen here <a href="https://player.whooshkaa.com/episode?id=940231">https://player.whooshkaa.com/episode?id=940231</a> Special thanks to Bailiwick Express for this podcast.</p>		<p><b>Reach:</b> 335  <b>Engagement:</b> 6  <b>Impressions:</b> 335</p>	<p>Jersey's Climate Conversation Facebook</p>
<p>In this podcast, Steve Skelton, Director of Strategy and Innovation, explains the draft Carbon Neutral Roadmap - a key document that sets out how Jersey will reduce its carbon emissions to net-zero by 2050. Listen here <a href="https://lnkd.in/e3vJE4zb">https://lnkd.in/e3vJE4zb</a> Special thanks to Bailiwick Express for this podcast.</p>		<p><b>Engagement:</b> 19  <b>Impressions:</b> 289</p>	<p>Jersey's Climate Conversation LinkedIn</p>
<p>The draft Carbon Neutral Roadmap suggests doubling Jersey's sea grass beds and using nature-based solutions to tackling the climate emergency and biodiversity crisis. Do you support this? Let us know at <a href="http://gov.je/CarbonRoadmap">http://gov.je/CarbonRoadmap</a></p>		<p><b>Engagement:</b> 5  <b>Impressions:</b> 119</p>	<p>Jersey's Climate Conversation Twitter</p>
<p>There's less than a week left to have your say on the proposed plans to tackle Jersey's climate emergency. We're aiming to make on-Island solid waste disposal net-zero by 2040. Have your say before the deadline on Monday at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a>  #carbonroadmap #netzero #goinggreen #carbon #climatechange</p>		<p><b>Engagement:</b> 36  <b>Impressions:</b> 3,389</p>	<p>Government of Jersey Instagram</p>

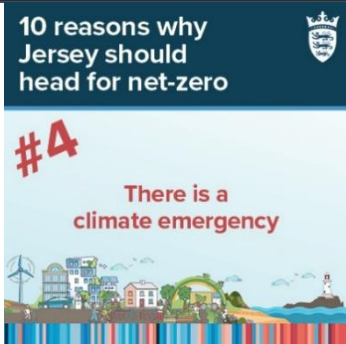

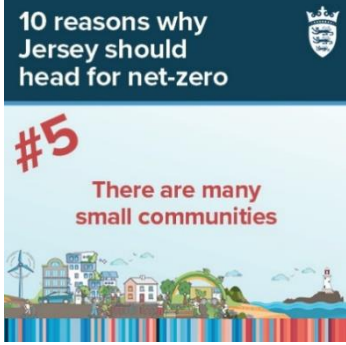



Post text	Post image	Engagement	Social media channel
<p>Responding to the climate emergency is a global challenge that no one country can address alone. Jersey is small, but it still has its role to play. Just because we can't do it all on our own doesn't mean we shouldn't try to do what we can. Jersey may feel protected from the worst impacts of climate change, but we already see more extreme weather and have the real threat of coastal flooding. Across the world, people are losing their homes to flooding and wildfires, and suffering food shortages. As impacts increase, mass migration grows and battles for scarce resources escalate, the effects will end up on our shores. 🌊☁️ To play our part, Jersey is aiming to reduce 68% of emissions by 2030, and become net-zero by 2050. To have your say on this, visit <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a></p>		<p><b>Reach:</b> 746 <b>Engagement:</b> 28 <b>Impressions:</b> 791</p>	Jersey's Climate Conversation Facebook
<p>Responding to the climate emergency is a global challenge that no one country can address alone. Jersey is small, but it still has its role to play. Just because we can't do it all on our own doesn't mean we shouldn't try to do what we can. Jersey may feel protected from the worst impacts of climate change, but we already see more extreme weather and have the real threat of coastal flooding. Across the world, people are losing their homes to flooding and wildfires, and suffering food shortages. As impacts increase, mass migration grows and battles for scarce resources escalate, the effects will end up on our shores. 🌊☁️ To play our part, Jersey is aiming to reduce 68% of emissions by 2030, and become net-zero by 2050. To have your say on this, visit <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a></p>		<p><b>Reach:</b> 226 <b>Engagement:</b> 20 <b>Impressions:</b> 240</p>	Jersey's Climate Conversation Instagram
<p>Through our climate policies, we can create fair access to clean and affordable energy, warmer homes, new jobs and re-skilling opportunities, less congestion in town and a chance for everyone to do their bit. 🏠🔧 Have your say on what you think of these policies at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a></p>		<p><b>Reach:</b> 314 <b>Engagement:</b> 7 <b>Impressions:</b> 319</p>	Jersey's Climate Conversation Facebook



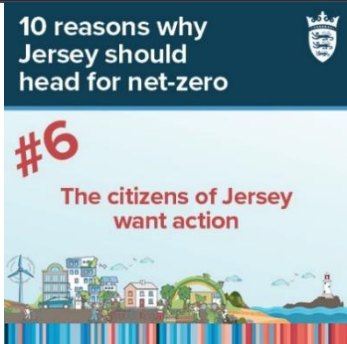



Post text	Post image	Engagement	Social media channel
Through our climate policies, we can create fair access to clean and affordable energy, warmer homes, new jobs and re-skilling opportunities, less congestion in town and a chance for everyone to do their bit. 🏠🔧 Have your say on what you think of these policies at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a> or by clicking on the draft Carbon Neutral Roadmap link in our bio 📱		<b>Reach:</b> 184 <b>Engagement:</b> 15 <b>Impressions:</b> 192	Jersey's Climate Conversation Instagram
To meet our net-zero ambition in alignment with the Paris Agreement by 2050 we need to decarbonise Jersey. Decarbonising our Island means that there will be cleaner, safer, quieter roads; reduced air pollution; more space for wildlife and to play outdoors; improved public health from active travel; cleaner beaches and a greater sense of community. 🏞️🚶🏠 The draft Carbon Neutral Roadmap sets out proposed policies to get us on this journey. Have your say on these policies at <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		<b>Reach:</b> 308 <b>Engagement:</b> 3 <b>Impressions:</b> 313	Jersey's Climate Conversation Facebook
To meet our net-zero ambition in alignment with the Paris Agreement by 2050 we need to decarbonise Jersey. 🇯🇪 Decarbonising our Island means cleaner, safer, quieter roads; reduced air pollution; more space for wildlife and to play outdoors; improved public health from active travel; cleaner beaches and a greater sense of community. 🏞️🚶🏠 The draft Carbon Neutral Roadmap sets out proposed policies to get us on this journey. Have your say on these policies by clicking on the draft Carbon Neutral Roadmap link in our bio 📱		<b>Reach:</b> 279 <b>Engagement:</b> 1 <b>Impressions:</b> 285	Jersey's Climate Conversation Instagram
In 2019, the States Assembly declared a Climate Emergency that is likely to have a profound effect on Jersey. The emergency hasn't gone away. We need to make changes to reduce our carbon emissions and set the Island on a path to a net-zero future. Let us know what you think of the policies outlined to tackle the climate emergency at <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a> .		<b>Reach:</b> 256 <b>Engagement:</b> 1 <b>Impressions:</b> 263	Jersey's Climate Conversation Facebook





Post text	Post image	Engagement	Social media channel
In 2019, the States Assembly declared a Climate Emergency that is likely to have a profound effect on Jersey. ☒ The emergency hasn't gone away. We need to make changes to reduce our carbon emissions and set the Island on a path to a net-zero future. Let us know what you think of the policies outlined to tackle the climate emergency at <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a> or click on the draft Carbon Neutral Roadmap link in our bio 🖱		<b>Reach:</b> 199 <b>Engagement:</b> 19 <b>Impressions:</b> 212	Jersey's Climate Conversation Instagram
Every nation around the world is made up of small communities. There are over 100 towns in the UK with a population less than that of Jersey. ☒ To reduce global emissions, everyone needs to play their part - Jersey is no exception. There's no such thing as too small to make a difference! To have your say on the policies outlined in the draft Carbon Neutral Roadmap, visit <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		<b>Reach:</b> 303 <b>Engagement:</b> 2 <b>Impressions:</b> 303	Jersey's Climate Conversation Facebook
Every nation around the world is made up of small communities. There are over 100 towns in the UK with a population less than that of Jersey. ☒ To reduce global emissions, everyone needs to play their part - Jersey is no exception. There's no such thing as too small to make a difference! To have your say on the policies outlined in the draft Carbon Neutral Roadmap, visit <a href="http://gov.je/CarbonRoadmap">gov.je/CarbonRoadmap</a> , or click on the draft Carbon Neutral Roadmap link in our bio 🖱		<b>Reach:</b> 200 <b>Engagement:</b> 11 <b>Impressions:</b> 211	Jersey's Climate Conversation Instagram
Why should Jersey head for net-zero carbon emissions? The Citizens' Assembly on Climate Change met in Spring 2021. They spent over 1500 hours debating and learning together, and made recommendations on how Jersey can reduce our carbon emissions. They were ambitious and want to see action! Have your say on the policies here: <a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a>		<b>Reach:</b> 2314 <b>Engagement:</b> 5 <b>Impressions:</b> 316	Jersey's Climate Conversation Facebook




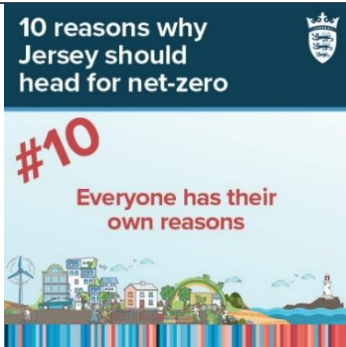
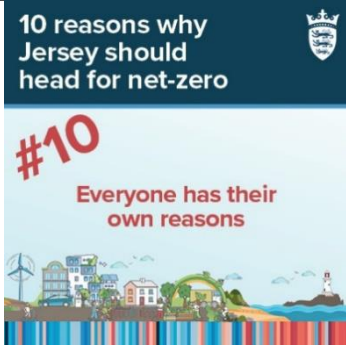



Post text	Post image	Engagement	Social media channel
Why should Jersey head for net-zero carbon emissions? The Citizens' Assembly on Climate Change met in Spring 2021. They spent over 1500 hours debating and learning together, and made recommendations on how Jersey can reduce our carbon emissions. They were ambitious and want to see action! Have your say on the policies here by clicking on the draft Carbon Neutral Roadmap link in our bio.		<b>Reach:</b> 206 <b>Engagement:</b> 23 <b>Impressions:</b> 215	Jersey's Climate Conversation Instagram
Jersey is an international finance centre, our reputation relies on us being responsible global citizens, quick to adopt and adhere to international standards and rules. It is vital that Jersey takes action and sets its climate targets in line with the rest of the world so as to tackle climate change. We don't want to be the odd one out and want to lead by example! Let us know what you think on the policies outlined in the draft Carbon Neutral Roadmap at <a href="http://www.gov.je/carbonroadmap">http://www.gov.je/carbonroadmap</a>		<b>Reach:</b> 342 <b>Engagement:</b> 4 <b>Impressions:</b> 2342	Jersey's Climate Conversation Facebook
Jersey is an international finance centre, our reputation relies on us being responsible global citizens, quick to adopt and adhere to international standards and rules. It is vital that Jersey takes action and sets its climate targets in line with the rest of the world so as to tackle climate change. We don't want to be the odd one out and want to lead by example! Let us know what you think on the policies outlined in the draft Carbon Neutral Roadmap, by clicking on the draft Carbon Neutral Roadmap link in our bio 🖱️		<b>Reach:</b> 173 <b>Engagement:</b> 12 <b>Impressions:</b> 180	Jersey's Climate Conversation Instagram
Jersey is an international finance centre, our reputation relies on us being responsible global citizens, quick to adopt and adhere to international standards and rules. It is vital that Jersey takes action and sets its climate targets in line with the rest of the world so as to tackle climate change. We don't want to be the odd one out and want to lead by example! Let us know what you think on the policies outlined in the draft Carbon Neutral Roadmap at <a href="https://lnkd.in/gSjWqJm5">https://lnkd.in/gSjWqJm5</a>		<b>Engagement:</b> 0 <b>Impressions:</b> 37	Jersey's Climate Conversation Instagram




Post text	Post image	Engagement	Social media channel
<p>78% of young people surveyed in Jersey were 'worried' or 'very worried' about climate change. A child born today faces multiple and lifelong health harms from climate change — a warmer world with an increased risk of food shortages, infectious diseases, floods and extreme heat. If urgent action is not taken, its impacts will be felt by our children and generations of their children living in Jersey. Let us know how you think we should be tackling climate change in Jersey</p> <p><a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a></p>		<p>Reach: 284 Engagement: 4 Impressions: 1287</p>	Jersey's Climate Conversation Facebook
<p>78% of young people surveyed in Jersey were 'worried' or 'very worried' about climate change. A child born today faces multiple and lifelong health harms from climate change — a warmer world with an increased risk of food shortages, infectious diseases, floods and extreme heat. If urgent action is not taken, its impacts will be felt by our children and generations of their children living in Jersey. Let us know how you think we should be tackling climate change in Jersey, by clicking on the draft Carbon Neutral Roadmap link in our bio </p>		<p>Reach: 133 Engagement: 11 Impressions: 141</p>	Jersey's Climate Conversation Instagram
<p>Our consumption drives emissions across the globe. While our annual on-Island emissions are 3.8 tonnes per person, an average European is responsible for almost 13 tonnes per year. As an example, about 14% of China's emissions result from consumption elsewhere which will include emissions from making things that we buy in Jersey. This is one of the reasons why Jersey should aim for net-zero emissions. Tell us your views on how we're planning on getting there </p> <p><a href="http://www.gov.je/CarbonRoadmap">http://www.gov.je/CarbonRoadmap</a></p>		<p>Reach: 247 Engagement: 2 Impressions: 247</p>	Jersey's Climate Conversation Facebook



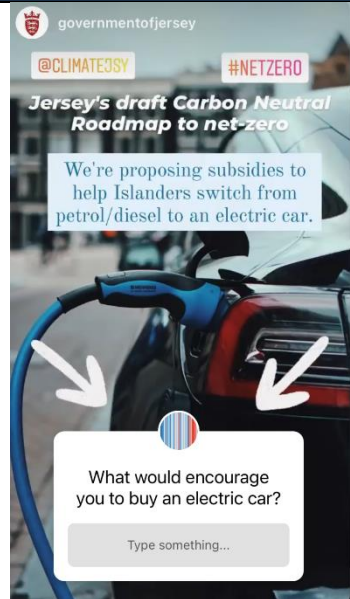
Post text	Post image	Engagement	Social media channel
Our consumption drives emissions across the globe. While our annual on-Island emissions are 3.8 tonnes per person, an average European is responsible for almost 13 tonnes per year. As an example, about 14% of China's emissions result from consumption elsewhere which will include emissions from making things that we buy in Jersey. This is one of the reasons why Jersey should aim for net-zero emissions. Tell us your views on how we're planning on getting there 📍 link in bio		<b>Reach:</b> 177 <b>Engagement:</b> 14 <b>Impressions:</b> 185	Jersey's Climate Conversation Instagram
We're taking a people-powered approach. We'll make more progress when everyone finds their reason to take action, to get involved and make sustainable choices, about how we travel, what we eat and how we use energy. Some people have their reason now, others will find it, but everybody's reason counts. ❤️ Tell us your reason at <a href="http://www.gov.je/carbonroadmap">http://www.gov.je/carbonroadmap</a>		<b>Reach:</b> 270 <b>Engagement:</b> 0 <b>Impressions:</b> 270	Jersey's Climate Conversation Facebook
We're taking a people-powered approach. We'll make more progress when everyone finds their reason to take action, to get involved and make sustainable choices, about how we travel, what we eat and how we use energy. Some people have their reason now, others will find it, but everybody's reason counts. ❤️ Tell us your reason by completing our survey, link in our bio 📍		<b>Reach:</b> 140 <b>Engagement:</b> 9 <b>Impressions:</b> 151	Jersey's Climate Conversation Instagram
The UK government has today announced its intention to extend UK ratification of the Paris Agreement to the 3 UK Crown Dependencies: the Bailiwick of Guernsey, the Isle of Man and the Bailiwick of Jersey. 🇬🇧		<b>Reach:</b> 753 <b>Engagement:</b> 22 <b>Impressions:</b> 753	Jersey's Climate Conversation Facebook



Post text	Post image	Engagement	Social media channel
The UK government has today announced its intention to extend UK ratification of the Paris Agreement to the 3 UK Crown Dependencies: the Bailiwick of Guernsey, the Isle of Man and the Bailiwick of Jersey. JE		<b>Reach:</b> 360 <b>Engagement:</b> 41 <b>Impressions:</b> 381	Jersey's Climate Conversation Instagram

## Appendix 2: Instagram stories

This table shows the stories which were published on Instagram relating to the draft Carbon Neutral Roadmap consultation, on both Government of Jersey and Jersey's Climate Conversation channels. The table shows the comments to the open-box questions and the results of polls.

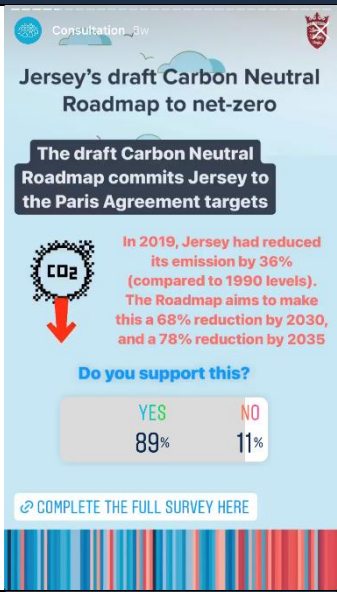

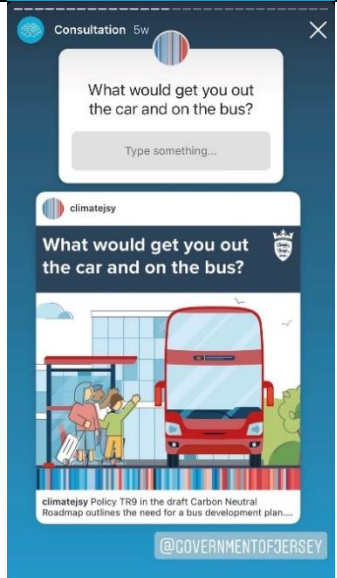
Post	Instagram channel	Comments	Poll results
	Government of Jersey and Jersey's Climate Conversation	Charging points installed for every apartment/flat in apartment/flat car park	<b>Yes:</b> 72% (133) <b>No:</b> 28% (51)
		Paying for home charging points	<b>Yes:</b> 78% (186) <b>No:</b> 22% (50)
		Bike path from Gorey through St Clement first/ 20mph limit for ebikes.	<b>Yes:</b> 73% (121) <b>No:</b> 27% (44)
		More charging spaces – free parking	<b>Yes:</b> 91% (224) <b>No:</b> 9% (23)
		Better cycling infrastructure first	<b>Yes:</b> 86% (181) <b>No:</b> 14% (30)
		Subsidise the cost of electric vehicles as they can be expensive	<b>Yes:</b> 89% (219) <b>No:</b> 11% (27)
		Infrastructure currently weak, you'd be better incentivising for things like external wall insulation on home	<b>Yes:</b> 62% (107) <b>No:</b> 38% (65)



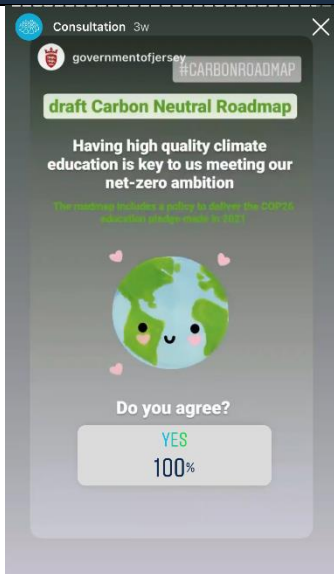
Post	Instagram channel	Comments	Poll results
 <p>27 January 10:21 @CLIMATEJSY</p> <p><b>draft Carbon Neutral Roadmap</b></p> <p>#CARBONROADMAP</p> <p>Don't miss your opportunity to have your say!</p> <p>The draft roadmap suggests doubling Jersey's sea grass beds and using nature-based solutions to tackling the climate emergency and biodiversity crisis</p> <p>Do you support this?</p> <p>YES 71% NO 29%</p>	Government of Jersey and Jersey's Climate Conversation		<p><b>Yes:</b> 80% (24)</p> <p><b>No:</b> 20% (6)</p>
 <p>18 January 11:51 @ROMERILS</p> <p>Thanks for the support!</p> <p><b>Would you like a 50% subsidy to replace your oil or gas boiler?</b></p> <p>Have your say on our proposed plans</p> <p>YES 82% NO 18%</p> <p>#CARBONROADMAP @CLIMATEJSY</p>	Government of Jersey and Jersey's Climate Conversation		<p><b>Yes:</b> 81% (72)</p> <p><b>No:</b> 19% (17)</p>
 <p>27 January 10:54 @CLIMATEJSY</p> <p><b>draft Carbon Neutral Roadmap</b></p> <p>We're all going to change how we live our lives and that includes the food we eat.</p> <p>Have you already made a change to your diet for environmental reasons?</p> <p>YES 50% NO 50%</p> <p>#CARBONROADMAP</p>	Government of Jersey and Jersey's Climate Conversation		<p><b>Yes:</b> 58% (18)</p> <p><b>No:</b> 42% (13)</p>





Post	Instagram channel	Comments	Poll results
 <p>Consultation 3w</p> <p><b>Jersey's draft Carbon Neutral Roadmap to net-zero</b></p> <p><b>The draft Carbon Neutral Roadmap commits Jersey to the Paris Agreement targets</b></p> <p>In 2019, Jersey had reduced its emission by 36% (compared to 1990 levels). The Roadmap aims to make this a 68% reduction by 2030, and a 78% reduction by 2035</p> <p><b>Do you support this?</b></p> <p>YES 89% NO 11%</p> <p><a href="#">COMPLETE THE FULL SURVEY HERE</a></p>	Jersey's Climate Conversation		<p><b>Yes:</b> 89% (8)</p> <p><b>No:</b> 11% (1)</p>
 <p>Consultation 6w</p> <p><b>Would you scrap your old, polluting vehicle for £500?</b></p> <p>YES 42% NO 58%</p> <p>climatejsy</p> <p><b>Scrap your old polluting vehicle for £500?</b></p> <p>climatejsy The draft Carbon Neutral Roadmap sets out how Jersey will reach net-zero by 2050...</p>	Jersey's Climate Conversation		<p><b>Yes:</b> 42% (5)</p> <p><b>No:</b> 58% (7)</p>
 <p>Consultation 5w</p> <p><b>What would get you out the car and on the bus?</b></p> <p>Type something...</p> <p>climatejsy</p> <p><b>What would get you out the car and on the bus?</b></p> <p>climatejsy Policy TR9 in the draft Carbon Neutral Roadmap outlines the need for a bus development plan...</p> <p>@GOVERNMENTOFJERSEY</p>	Jersey's Climate Conversation	<p>Cheaper and more evening buses</p> <p>Option to be able to get on the school bus with younger children</p> <p>A better route system between western parishes. Going between St Ouens, St Brelades and St Peters</p>	<p><b>Yes:</b> 85% (17)</p> <p><b>No:</b> 15% (3)</p> <p><b>Yes:</b> 60% (6)</p> <p><b>No:</b> 40% (4)</p> <p><b>Yes:</b> 90% (18)</p> <p><b>No:</b> 10% (2)</p>




Post	Instagram channel	Comments	Poll results
	Government of Jersey and Jersey's Climate Conversation		Yes: 100% (77) No: 23% (5)



## Appendix 3: Jersey Evening Post adverts


The following images were advertised in the Jersey Evening Post.

The Jersey Evening Post has approximately 58,649 daily readers and website views.




# Jersey's draft Carbon Neutral Roadmap to net-zero


We've set out our Roadmap to help Jersey reduce its carbon emissions and reach net-zero by 2050.

 The consultation on the Government of Jersey's draft Carbon Neutral Roadmap gives you the opportunity to feedback on the proposed policies for tackling the climate emergency.

Have your say by going to [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap) or visit your Parish hall to collect a copy of the consultation survey.

Organisations and businesses are also invited to make formal written submissions, with more details available on the website.



 The draft Carbon Neutral Roadmap consultation runs until 31 January 2022.

Feedback will then be reviewed before the Roadmap is lodged for States Assembly debate.

Figure 4: Advert included in the Jersey Evening Post on 3 January 2022.






# What would get you out of your petrol and diesel vehicles?

**How about scrapping your old polluting vehicle for £500 or subsidies on electric vehicles?**



 **We want your views on Jersey's incentives and actions to get you out your car and reducing our Co2 emissions.**

Visit: [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap)  
 Or visit your parish hall to collect a copy of the consultation survey.

You can also make wider ranging written submissions. More details are available on the website.




 The draft Carbon Neutral Roadmap consultation runs until **31 January 2022**.

Figure 5: Advert included in the Jersey Evening Post on 10 January 2022.




# Would a 50% subsidy encourage you to make the switch away from your oil or gas boiler?\*

\* 100% subsidy for some eligible households


 **We want your views on how the proposed incentives and actions to reduce emissions in Jersey will impact you?**

Visit: [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap)



Or visit your parish hall to collect a copy of the consultation survey.

You can also make wider ranging written submissions. More details are available on the website.

 The draft Carbon Neutral Roadmap consultation runs until **31 January 2022**.




Figure 6: Advert included in the Jersey Evening Post on 18 January 2022.



## Appendix 4: Radio adverts

Two radio adverts were played on Channel 103 during the consultation period. 59% of Jersey's population listens to Channel 103 each week, reaching 54,400 people in Jersey each week.

The general advert was played between 17 December 2022 – 2 January 2022, between 2 and 4 times a day. The advert was played a total of 48 times.

The script was as follows:

The draft Carbon Neutral Roadmap lays out how Jersey can reduce its carbon emissions as we work together to tackle the climate emergency.

Now it's your opportunity to help shape the path the Island takes towards a net-zero future. What would get you out of the car and on the bus more often? What support is needed to help Islanders convert to low-carbon heating systems?

To have your say in the Government of Jersey's consultation visit [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap) (gov dot jay ee slash carbon roadmap) or pick up a copy of the survey from your parish hall.

The transport advert was played between 7 January 2022 – 21 January 2022, 4 times a day. The advert was played a total of 60 times.

The script was as follows:

The draft Carbon Neutral Roadmap lays out how Jersey can reduce its carbon emissions as we work together to tackle the climate emergency.

Now it's your opportunity to help shape the path the Island takes towards a net-zero future. What would get you out of the car and on the bus more often? What support is needed to help Islanders convert to low-carbon heating systems?

To have your say in the Government of Jersey's consultation visit [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap) (gov dot jay ee slash carbon roadmap) or pick up a copy of the survey from your parish hall.



## Appendix 5: Bailiwick Express adverts

Adverts were placed on the Bailiwick Express website on 24 January 2022.

The website banner had 40,040 views and was 'clicked on' 16 times.



Figure 7: Banner advert used on Bailiwick Express online.

The website 'double skyscraper' advert was viewed 7,794 times and was 'clicked on' 13 times.

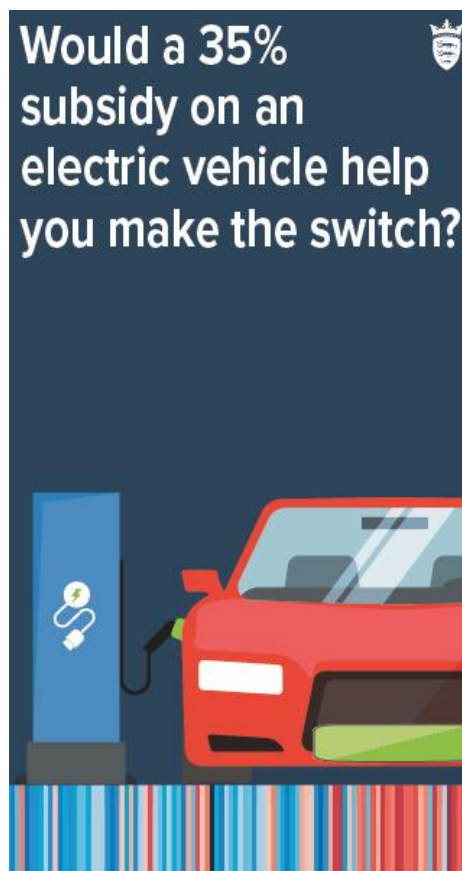


Figure 8: Double skyscraper advert used on Bailiwick Express online.



## Appendix 6: Google adverts

Adverts were paid for on google websites from 17 December 2021 – 23 January 2022. Clicking on the advert took you to the Government of Jersey consultation page<sup>28</sup>.

The following adverts show the impressions (the total number of times the post has been seen), and how many people clicked on them.



Figure 9: Image used for a google advert. The 'general focus' images used in google adverts ran from 17 December 2021 – 31 December 2021. The 'general focus' images had 1,014,447 impressions and were clicked on 5,354 times.



Figure 10: Image used for a google advert. The 'general focus' images used in google adverts ran from 17 December 2021 – 31 December 2021. The 'general focus' images had 1,014,447 impressions and were clicked on 5,354 times.

<sup>28</sup> [Carbon Neutral Roadmap consultation \(gov.je\)](https://www.gov.je/CarbonNeutralRoadmap/consultation)







Figure 11: Image used for a google advert. The 'transport focus' images used in google adverts ran from 10 January 2022 – 16 January 2022. The 'transport focus' images had 1,077,454 impressions and were clicked on 4,147 times.



Figure 12: Image used for a google advert. The 'transport focus' images used in google adverts ran from 10 January 2022 – 16 January 2022. The 'transport focus' images had 1,077,454 impressions and were clicked on 4,147 times.

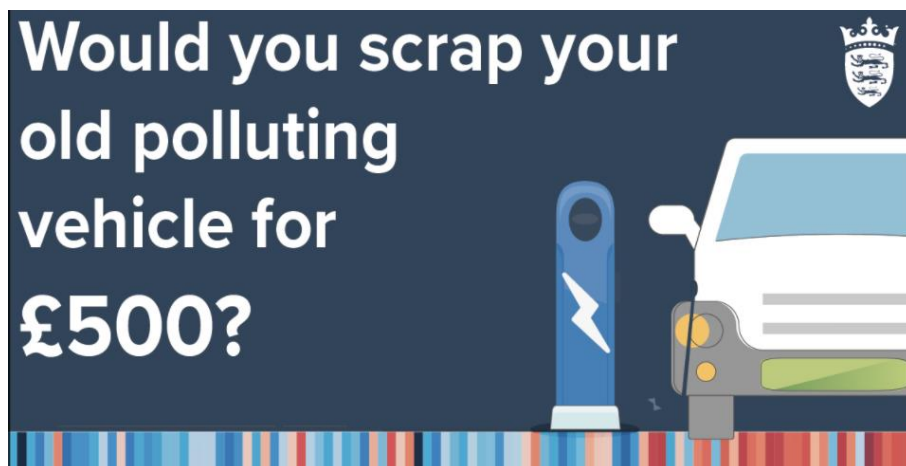


Figure 13: Image used for a google advert. The 'transport focus' images used in google adverts ran from 10 January 2022 – 16 January 2022. The 'transport focus' images had 1,077,454 impressions and were clicked on 4,147 times.







Figure 14: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.



Figure 15: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.



Figure 16: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.



Figure 17: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.



Figure 18: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.



Figure 19: Image used for a google advert. The 'heating focus' images used in google adverts ran from 18 January 2022 – 23 January 2022. The 'heating focus' images had 601,339 impressions and were clicked on 2,307 times.

## Appendix 7: Carpark banners

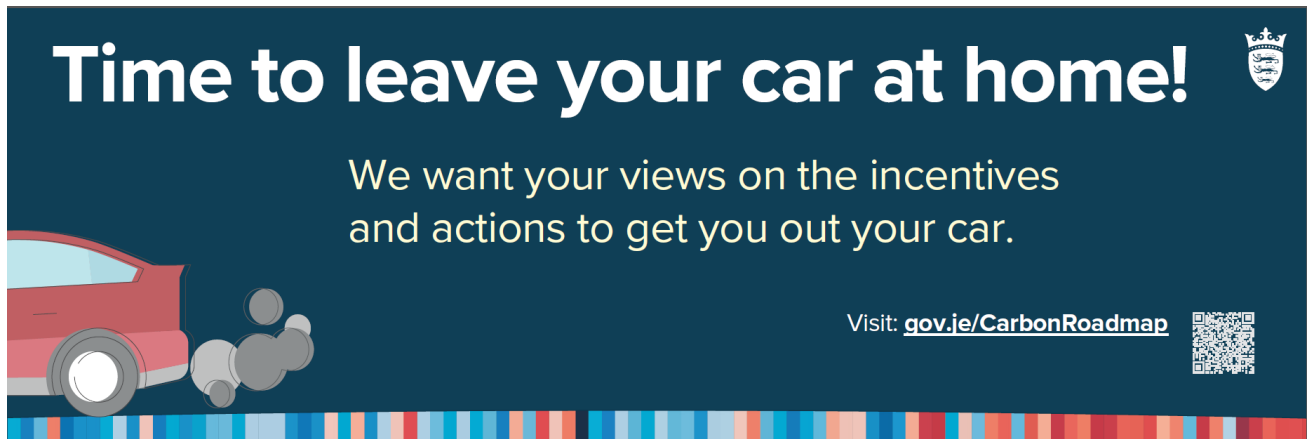


Figure 20: Banners which were put up at Sand Street car park, Patriotic Street car park, Pier Road, Green Street car park and Minden Place car park.

## Appendix 8: Poster



Figure 21: General poster, used at stakeholder events.

# Appendix 9: Window decal



Figure 22: Decal on Romerils' shop window,.

# Appendix 10: Government of Jersey website banner

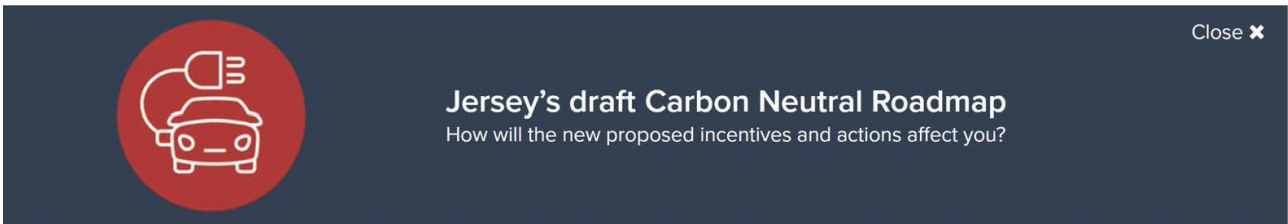


Figure 23: This advert was placed on the banner of the Government of Jersey website for one week.



# Appendix 11: MURAL board

## Heating policies

Zoom in on the policy you want to look at. Add your comments by typing on a post-it (coloured square). If you need more post-its you can copy and paste. Ask your facilitator for help if you aren't sure or would like them to type for you.

### HT1 - Supporting low-carbon heating systems and home insulation

The Government of Jersey will:  
Provide a subsidy to enable both householders and commercial businesses to transition to low-carbon heating systems.

The scheme will run from 2022 until 2025.

Purchase incentive to replace oil or gas boiler with specified alternatives

- Covers 50% of the cost up to £5k
- Up to £10k and no match funding required for low income households

### HT2 - Update building bye-laws

The Government of Jersey will:  
Bring into force legislation that updates current building regulations and sets increased energy efficiency and carbon emission standards of new and existing domestic and commercial buildings and prohibits new fossil fuel boilers being installed in any property after 1st January 2026.

Review and update building bye-laws in 2022

- Increase minimum energy standards in new buildings and when existing buildings are renovated
- End the replacement of oil and gas boilers from 1 January 2026

### HT3 Energy Performance Certificates

The Government of Jersey will:  
Develop and introduce legislation to make both domestic and commercial Energy Performance Certificates mandatory at the point of sale and rental by the end of 2024, with minimum standards being brought in sequentially from 2026.

Government will also ensure that Energy Performance Certificates are displayed on public buildings by 2025.

Other thoughts about this policy and its impacts on you

What is bad about this policy? what are the negative impacts

What is good about this policy? what are the positive impacts

Other thoughts about this policy and its impacts on you

What is bad about this policy? what are the negative impacts

What is good about this policy? what are the positive impacts

Other thoughts about this policy and its impacts on you

What is bad about this policy? what are the negative impacts

Figure 24: A screenshot of the 'MURAL' board used during online consultation sessions.



## Appendix 12: Written submissions

### Appendix 12.1: A Cornish Electrical written submission

#### Climate Emergency

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**From:** A Cornish Electrical [REDACTED]  
**Sent:** 31 January 2022 14:38  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Roadmap Feedback.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation response

Good afternoon,

As a small-medium business [REDACTED] our feedback about the Carbon Neutral Roadmap. I think it's fantastic to see something being put in place and believe we all have both a personal and corporate responsibility to stop the damage and where possible repair what can be repaired.

We are an established electrical contractors who enjoy what we do but want to find ways to offer further energy saving solutions to our customers. Over the last 2-3 years we are beginning to see an increasing amount of requests for EV charging units which is great, but believe we can offer more.

[REDACTED]

We would welcome working with the government to support wider education of energy saving and carbon footprint. From a personal and a business perspective I have a few points for consideration listed below:

#### **Financial Incentives:**

There definitely needs to be some sort of financial incentive to convert people to EV. We are trying to move our fleet of vans to EV but can only do this gradually due to the cost of changing the vehicles. From a business perspective EV vehicle grants would be welcomed. From a personal perspective I think the only option would be to either offer free parking to EV's or introduce a Road Tax for non-EV's.

More FREE EV charging points would be a great incentive. These could be powered by solar panels on the roofs of car parks from energy stored in batteries.

Investing in solar panels and energy storage solutions can initially be costly and off putting for many people. It is fairly straight forward to provide customers with a ROI for the purchase but what would make this ROI much more attractive would be an decent energy buy-back offer for surplus energy (eg: government matches JEC offering).

#### **Small-Medium Business Support:**

Training can be costly for small-medium businesses, not just the cost of it but the working time lost, especially if it's off-island. Grants and funding to help train more employees would be welcomed.

Sustaining a profit margin for small-medium businesses is getting harder and harder, especially post COVID and BREXIT which has seen not only a horrendous hike in materials but suppliers adding "COVID subsidies". We are also a company who chose to pay all our employees the whole way through lockdown and have paid sickness for isolation. If there could be something along the lines of GST exemptions for the supply/purchase of renewable energy products and services that is a win:win for both supplier and consumer.

I would be very interested in seeing further developments of the roadmap and being involved in any surveys / forums about the topic, so if you have a mailing/contact list please could you add me to it.

Kind regards

### To; Minister of the Environment

#### Carbon Neutral Roadmap consultation

Dear Sir,

Comments for consideration in response to this consultation.

Affinity wants to see decisions and policies that are;

1. Suitably ambitious with the scale and scope to enable carbon neutrality and a set of metrics and targets to measure and report progress.
2. Realistic in terms of communicating to all islanders the changes that lie ahead – both in terms of rising costs and the behavioural/lifestyle shifts required.
3. Motivating and inclusive to ensure a fair and just transition, which every islander can participate in and contribute to. The Government should lead by example.
4. Considerate of jobs, given the significant upheaval in economic and societal systems the transition will bring. The training and retraining of the workforce will be an important success factor.
5. Recognising the pivotal role the finance industry can - and should - play. This to include guidance and administration of green bond issuance and the management of public pensions and reserves in sustainable investment strategies. The latter actively reducing the island's Scope 3 emissions.

#### How can we address apathy?

Addressing climate change is the challenge of our time and it will require unity, resolve, passion and ingenuity from leaders around the world to achieve this. At the same time, all governments allocating resources to solving the net-zero equation do so against a backdrop where their populations expect the continued pursuit of economic development and an ongoing rise in their nation's prosperity. The people of Jersey are no different and elected officials face an enormous task in catalysing engagement and instigating change. This consultation period, following the release of the Carbon Neutral Roadmap, confirms we have reached the point where talk now has to turn to action.

A recent report published by McKinsey & Co (*The net zero transition – what it would cost, what it could bring*) highlights the problems Jersey – and many other nations – face as they now take this next step. They make the observation as stakeholders increase their commitments to net zero, moving to action has not proven easy or straightforward. The report highlights five reasons why this is the case;

- i. The scale and pace of the step-up in spending, needed on physical assets, is enormous.
- ii. The collective and global action required is equally massive, particularly in the context the burdens of the transition will not be evenly felt.
- iii. Those required to make the changes/sacrifices over the short to medium term are not those who are likely to benefit over the long term.
- iv. The reset to business practices and lifestyles, which have evolved over decades, are extremely difficult to catalyse and achieve buy-in.

- 
- v. The energy transition involves the transformation of the most important systems supporting our lives and well-being. The changes ahead will affect daily lives and it is unlikely the transition will run smoothly. For example, impairing access to electricity, and/or rising producer and consumer costs could all lead to delays and pushback from the public.

*"Together, these factors highlight why the prevailing notion of enlightened self-interest alone is unlikely to be sufficient to help achieve net zero."* McKinsey & Co 2022.

We need a strong government – one which is not afraid to communicate difficult messages. Which implements policies that likely will not please the majority, but are the right thing to do for our island and the planet. This will require taxes to rise, the government to dictate choices and everyone to make sacrifices in terms of lifestyle. No one can opt out.

### **Action taken**

Affinity supports the majority of the strategic policies presented in the Carbon Neutral Roadmap. The business has highlighted the publication of the consultation document internally and encouraged employees to engage in the process by completing the online survey.

Affinity's Sustainability & Ethics Committee has reviewed the Roadmap and provided input to this submission.

Affinity will continue to support and participate in the Jersey Finance 'Jersey for Good – A Sustainable Future' initiative, recognising the role this plays in achieving the goal of delivering 'green finance on a green island'. Ongoing collaboration between the finance industry, the Jersey Financial Services Commission and the Government will be essential if the island is to deliver a number of the Roadmap's goals.

**31 January 2022**

Word count 708

## Appendix 12.3: Anneville Farm Limited written submission



Date 30 - 01 - 22

Minister of Environment

[Title]

General submission

Enabling Policy

Dear Sir

With ref. to Climate Emergency and road to carbon Zero.

Your proposals for transport and heating still require a source of energy to replace and run the proposed electric Vehicles and heating appliances, This involves huge capital investment which is currently unaffordable for a large number of the population. 45years ago a house could be built with a high level of insulation which required no heat input ( max profit over ruled ) .

Man's needs are Food , Water, Shelter and Transport .

Food The Island is dependent on imports for 96% of it's food requirements . Due to current environmental disasters around the world together with labour shortages ,transport and covid the food availability that we have become accustomed to is, I believe on the verge of collapse. Our agricultural industry is in dire straits due to lack of governmental and public support . The diversity of crops which were produced have gone together with the farms and farmers if we are to contribute to reaching carbon zero we start with food production (security)

HOW ? Situation : no farms ,no farmers , no workers and the land will take years to restore and if the supermarkets survive they need to buy local however , I believe we probably need to be looking at the local corner shop which customers can walk to.

If we are serious about reducing carbon emissions it is every ones responsibility to change life styles and consider each purchase and activity (travel etc) As a society we should not be dumping food ,I don't believe that will continue for much longer . Destruction of unsold products should not happen and production of substandard products should cease, it is a waste of resources.



Shelter . Insulation and solar power should have been considered as a requirement with insulation set at a high u value .

Transport : Electric vehicles raise more issues than they solve ,still require energy to run and produce .

I understand that new combustion engines are 50% less efficient ,and the E10 fuel causes more engine wear. Tractors are unaffordable and electric ones while under trial will not be available for some time.

Ships and trucks all consume huge amounts of energy. Future will need a perpetual motion generator to facilitate electric power as we will run out of resources to convert the world to electric power.

In the global arena our contribution will be small however if we were to start with trying to restore our agricultural industry we will go some way to reducing our carbon footprint. I do not think that electric cars or changing domestic boilers will contribute at all . By implementing changes to say the journeys we make ,the temperatures we maintain in homes and lights left on ,also cutting street lighting will make a difference . I haven't even touched on technology ,but that is also a huge consumer of energy.

Sincerely,

## Appendix 12.4: Assosiation of Jersey Architects written submission

### The Carbon Neutral Roadmap (2021 Consultation Draft)

Consultation comments by and on behalf of the Association of Jersey Architects (AJA). Jan 2022

The Carbon Neutral Roadmap (2021 Consultation Draft) represents aspirational guidance for the Government of Jersey to direct the island into becoming Carbon Neutral by 2050.

Informative in nature, the Roadmap provides little clear policy and the document primarily provides an indication of the possible route for Jersey to follow for the next 30 years.

While the document is of general interest, the following comments relate to the specific areas where the AJA's particular expertise can provide informed and relevant comment and insight. The AJA welcomes the invitation to consult on this Carbon Neutral initiative and in future consultation referred to in the Roadmap.

Regarding the sources of emissions relating to the built environment (Chapter 7), the reduction in energy demand and switching to low carbon energy sources is key. While the Roadmap focus is on carbon emissions, current building performance criteria considers energy efficiency. The translation to low carbon energy sources does allow the reduction in carbon emissions, however, may not improve building performance and should be considered secondary to performance enhancement.

The proposed aim of moving to low carbon energy sources is not in question, however current industry expertise, capacity and general construction industry momentum could slow the transition, and the potential of alternative lower carbon bio-fuel supply may provide an improved interim arrangement.

The improved performance of new buildings is vital, however with approx. 80% of the buildings expected to be standing in 2050 already in existence, the importance of improving the existing building stock cannot be downplayed.

Upgrading Building Byelaw standards, to improve building performance would provide a straightforward readily achievable approach and is a mechanism that should be strongly encouraged.

Improving the performance of existing buildings is a more complex challenge, but essential for carbon neutrality to be achieved. While the proposed initiative requiring mandatory enhancements to buildings at the point of sale would inhibit the property market, grants and other incentives to encourage building improvement would provide a more successful approach. This alternative would encourage the necessary skill development, enrich the built-up area, appreciate the existing building stock and focus on maximising performance, rather than meeting minimum threshold standards.

The proposed funding to incentivise building enhancements is welcomed, however, to achieve the sea-change in emissions reduction needed, the funding and focus needs to be significantly increased.

Similarly, the requirement for mandatory Environmental Performance Certificates (EPCs), training low energy heating specialists, performance and retrofitting expertise, the level of local skills needs to be radically and immediately overhauled to enable subsequent implementation within the desired timescale. This will require significant local training and financial encouragement to implement.



Referring to the proposed Delivery Plan (2022 - 2025) Policies, the AJA would comment as follows:

#### HT1 – Supporting Low Carbon Heating Systems and Home Insulation

The proposed subsidy to transition to low carbon heating systems and improved fabric performance is supported, however, incentives need to be significantly increased to realise the desired island wide performance enhancements and kick-start the process. With boiler replacements estimated at £5,000, this equates to 1,000 households, far short of the 16,000 households sought by 2030.

Such performance improvements to existing and new buildings will inevitably lead to visual changes to the built environment, and the Planning Department must be fully in tune with these measures and refine their relevant Planning Policies to achieve this result.

#### HT2 – Update Building Byelaws

Upgrading these standards is crucial, should be taken forward without delay and with Construction Industry consultation to ensure necessary capacity, training and performance is achieved.

#### HT3 – Energy Performance Certificates

The mandatory introduction of EPCs would provide valuable insight into building's performance, base figures to gauge improvements and the encouragement needed to make such enhancements. Limited local skills will require necessary training and financial support to establish.

#### OE1 – Promoting Low Carbon Lifestyles

The AJA would welcome ongoing consultation to inform public understanding and inclusion within the Carbon Neutral Alliance.

#### OE2 – Construction Sector Emissions

The AJA would welcome ongoing consultation to inform policy levers and construction standards. While improving standards to a level equivalent to Passivhaus or similar is encouraged, the mandatory requirement to achieve Passivhaus Certification at Planning stage should be avoided. Such controls would restrict development, architectural quality, result in increased pre-construction costs, timescales and endanger local consultation employment.

#### EN2 – Create a Carbon Neutral Alliance

The AJA would welcome ongoing consultation to inform public understanding and inclusion within the Carbon Neutral Alliance.

#### EN3 – Developing Supply Chains and On-Island Skills for a Sustainable Economy

The AJA would welcome and support initiatives and incentives to develop skills to enhance the performance of buildings and a low carbon island.



# Appendix 12.5: ATF Fuels written submission

Organisation	-	ATF Fuels (ATF)
Contact Details	-	Name: [REDACTED]
		E-Mail: [REDACTED]
		Mobile: [REDACTED]
Subject	-	Transport Policies

Dear Minister of the Environment

## Overview

With ATF's commitment to low prices and best environmental practice we wish to constructively contribute to this important Carbon Neutral Roadmap.

Our key points;

- ATF believe GoJ policy-makers should adopt international best practice in relation to liquid biofuels. This action can be made now, with immediate tangible benefits, our analysis indicates this could equate to the equivalent of 6,841 cars off the road;
- Ensure the transport policy makes sustained on-going behavioural change;
- Achieve a more targeted approach with the use of renewable road fuel, immediately for Passenger Service Vehicles (PSVs) and potentially then Heavy Goods Vehicles (HGVs);
- Achieving best value from monies raised by the levy on road fuels (without unintended consequences)

The Government of Jersey (GoJ) commissioned a report<sup>1</sup> to provide an assessment of the maturity and economic viability of technologies that could play a role in the decarbonisation of Jersey's transport sectors.

GoJ's own independent published analysis evaluated the use of liquid biofuels along the supply chain to evaluate what investments would be needed to make these technologies feasible.

## Liquid Biofuels – Bioethanol & Biodiesel

GoJ's report correctly states that biofuels are feasible and international precedent in the use of these fuels has been set.

In 2008, the UK Government introduced the Renewable Transport Fuel Obligation (RTFO), as the main policy tool, with the aim of reducing greenhouse gas emissions (CHG) from road transport fuels. All fuels have had an obligation to contain a 'bio element' in the UK. Ethanol is blended with the Petrol and in Diesel, Fatty Acid Methyl Esters (FAME).

The UK and many other countries mandate fuel suppliers to only sell fuels that contain a bio element of 10% Ethanol in Petrol and 7% FAME in Diesel. E10 (Petrol) and B7 (Diesel), relate to the % of biofuel contained within them.

These fuels reduce the overall levels of CO2 emissions as they use less fossil fuels.

1 <https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/Review%20of%20future%20energy%20mix%20options.pdf>  
2 <https://www.iea.org/reports/renewables-2019/transport>

Like other countries Jersey can make an immediate start, with real and sustained reductions to carbon emissions by mandating E10 & B7.

ATF are pleased to already be supplying its customers with these types of fuel.

### Hydrotreated Vegetable Oil (HVO) – Direct replacement for Diesel

GoJ Policy TR3 suggests subsidising 2<sup>nd</sup> generation biofuels such as HVO, spending approximately £2.9 million to subsidise 9 million litres of second-generation diesel over a 4 year period.

We commend the intentions of Policy TR3, nonetheless this approach could be refined further to secure an even better outcome, with more focus.

Experience shows that untargeted subsidies may not lead to a sustained change in behaviour.

ATF believe the costs, workings and intended beneficiaries should be published in respect of any subsidies.

### Behavioural change

Our experience suggests that the public remain price conscious, particularly at a time of rising inflation. The increased use of ATFs price competitive Forecourts demonstrate this.

The market price of HVO is approximately 60 pence per litre (ppl) higher than ATFs B7. With a rebate of 32ppl in place, ATF would retail HVO at approximately 170.90ppl, at the time of writing (26/01/2022). An average customer purchases 34 litres, hence HVO would increase a fill by £12. ATF is concerned that this could be unaffordable to our many domestic and commercial customers.

To facilitate a change of consumer behaviour, a more targeted approach would be beneficial to secure maximum and immediate impact.

PSVs and HGVs, are known to be hard to electrify and therefore better outcomes would arise by targeting users of vehicle who do not currently have a choice to switch.

The GoJ Carbon Neutral Roadmap could encourage more public transport users by targeting initially buses and potentially later all taxis thereby reducing the amount vehicular movements on our roads.

Finally, according to Jerseys population estimate (2019) there are 17,420 young people between the ages of 5-19 .

The Governments proposal that anybody under the age of 18, could receive a free bus pass that currently costs £20, is costed at £348,400 per annum.

A repurposed Policy TR3 could deliver the equivalent 8 years of free bus travel, using Zero Carbon public transport which would change behaviours and also help educate young people about the importance of Climate Change.

<sup>1</sup> <https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/Review%20of%20future%20energy%20mix%20options.pdf>

<sup>2</sup> <https://www.iea.org/reports/renewables-2019/transport>

### Price security and sustainability of supply

An important point for consideration is the availability of the fuel.

In the assessment of the proposal the report<sup>1</sup> states that the modelling was based on market availability and the cost remains stable. As policy makers will understand this product is a commodity and prices will change due to market forces.

In relation to Security of Supply, current global production of HVO is over 5 million tonnes forecast<sup>2</sup> to increase to 13 million tonnes by 2024. To put this into perspective the UK consumes over 36 million tonnes of road diesel per annum

As demand increases from competing industries such as other Road Transport, Aviation and Heating, demand has the risk of outstripping supply.

ATFs market view is that the cost of HVO could rise further.

ATF recommends any subsidies should take account of these likely market fluctuations to ensure the policy outcome are met.

### Price Transparency

Subsidies, whilst well intentioned, have the possibility to not reach the end user and instead can be lost in supply chains.

ATF recommends that any price subsidy is accompanied by a clear and independently validated mechanism to ensure the end customer benefits.

### Policy TR3 CO2 Emissions outcomes

ATFs analysis of the CO2 emission outcomes of the proposed Policy TR3 would equate to 90,961 t/CO2 per annum from road transport.

In comparison adoption of the global standard in the use of liquid biofuels would equate to 88,731 t/CO2 annum (at zero cost to taxpayers).

Potentially a saving of 2,230 t/CO2 per annum.

ATF would be happy to share these workings with Government.

<sup>1</sup> <https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/Review%20of%20future%20energy%20mix%20options.pdf>

<sup>2</sup> <https://www.iea.org/reports/renewables-2019/transport>

## Conclusion

ATF believe that the Carbon Neutral Roadmap in relation to Transport, can achieve tangible climate benefits and best value for taxpayers, and road users, by;

- 1) Adoption of International Best Practise, by requiring liquid biofuels in legislation;
- 2) Targeting any rebate for HVO toward PSVs and by this repurposing considering fully subsidising travel for under 18s for up to 8 years;
- 3) Ensure the £2.98 million spend proposed in Policy TR3, is reviewed.

ATF hopes this submission is helpful contribution to the Jerseys Climate Change Emergency response and would welcome the opportunity of explaining this submission with Government.

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1 <https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/Review%20of%20future%20energy%20mix%20options.pdf>

2 <https://www.iea.org/reports/renewables-2019/transport>

## Appendix 12.6: Beaulieu Primary School Eco Group written submission

**From:** [REDACTED]  
**Sent:** 28 January 2022 15:28  
**To:** Climate Emergency  
**Subject:** carbon neutral road map

Dear Team

Here are the following ideas from our Eco group at Beaulieu Primary school.

[REDACTED] said make electric cars more affordable  
[REDACTED] said push the date forward to make everyone own an electric car  
[REDACTED] said try and encourage more people to walk and maybe they could build up tokens on their apps and could put these tokens towards purchasing an electric car  
[REDACTED] said provide more affordable solar panelling to heat your home  
[REDACTED] said could we install wind power farms maybe on the north coast  
[REDACTED] says make the cost of lighting your home more expensive during the day

Kind Regards  
[REDACTED]

--  
[REDACTED]  
Beaulieu Convent School  
Wellington Road  
St Helier  
Jersey JE2 4RJ

T: (01534) 731280  
F: (01534) 888607  
Twitter: @BeaulieuSchool

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## Appendix 12.7: Bikers written submission

Dear Sir,

Carbon Neutral Roadmap - Transportation

I am responding to the draft Carbon Neutral Roadmap as [REDACTED] at Bikers, a motorcycle dealership operating at Georgetown Garage. This response focuses on transport issues and related carbon emissions.

The Carbon Neutral Roadmap identifies transport as a major source of emissions - and the key answers to solve the perceived problem of private car use and related emissions are to either swap to an electric car (expensive and availability of charging infrastructure is an issue) or move to alternative transport - with the options outlined in the Road Map being 'active' travel (walk/cycle) or to take the bus. These limited options are not suitable for everyone.

As a motorcycle dealership we see customers on a regular basis looking to change to light weight motorcycles or road legal scooters ('powered two wheel' transport or 'PTW') as an alternative to using a car. Our customers are often budget constrained, driving older cars, cannot afford to consider a switch to electric cars but still need a feasible independent transport option. It is clear that many 'single occupant' car journeys such as commuting can be completed by PTW.

Petrol engine PTW's (in particular those with smaller engine capacities) create lower CO2 emissions than travel by car or bus - a JEP article in November 2021 quoted emissions of 171g/km for car usage, 104g/km for a bus user whilst a 125cc scooter can be in the region of just 60g/km. PTW's also reduce congestion and demand for parking spaces (4 or 5 PTW's take the space of a single car).

Affordable, silent, zero emission electric mopeds and scooters/light motorcycles are becoming readily available with an acceptable range perfectly suited for commuting or short local journeys. These vehicles can typically be charged from a standard household three pin socket and have batteries which can easily be removed for charging, thereby alleviating the need for expensive charging infrastructure.

However the difficulty we often see in converting an enquiry into a new rider surrounds the complexity and cost of the licencing process.

At present a new rider has to undertake a one day 'Compulsory Basic Training' course (cost £135), followed by a theory test (£38) followed by a practical test (£48). This applies whether the rider is a 16 year old taking to the road for the first time or an experienced car driver who will have already undertaken and passed a theory test as part of the car licencing process.

Whilst customers appreciate and understand the reasons for the CBT course (primarily learning machine control skills and rider safety) they express concern at the amount of time commitment necessary to take the tests as well as the costs involved and will often 'give up' on the idea at this point.

If the licencing process could be simplified we believe we would see more people making the switch from cars to PTWs.

We think consideration could be given to allowing 'experienced' drivers to shortcut the current process and take to the road in a much simpler manner, potentially along the following lines :

- Fast track scheme available to drivers aged over (say) 22 who have held a car licence for (say) 2 years
- Grant of a full 'light motorcycle' licence upon satisfactory completion of a CBT training course without the need to take a further theory/practical test.

If it was felt that it would be wrong to promote a switch from cars to petrol engine PTWs there would always be the option to apply this only to people making the change to electric PTW's (this could be done by having an 'electric moped' or 'electric light motorcycle' driving licence category or by applying a restriction to the existing category in a similar manner to manual/automatic restrictions are applied).

The concept of encouraging the use of PTW's could also be further extended to reduce traffic congestions and related emissions arising from school traffic.

At present, 16 year olds can apply for a licence to ride a moped (50cc bike restricted to a maximum speed of 30mph) and, in the past, a reasonable number of youngsters took up this option, thereby easing the number of cars making the school run. However numbers have reduced in recent years with many parents feeling that the costs involved with buying the bike, sorting insurance, buying protective clothing etc and undertaking training/tests was not worthwhile if the bike was only to be used for a year before the child got a car at 17.

In contrast, Guernsey allows 14 year olds to ride mopeds - giving a 4 year window to use the bike before they move on to a car at 17 - the take up rate in Guernsey is much higher yet we do not hear about road traffic accidents involving young riders on the news on a regular basis. A 'spin off' benefit of the time spent on PTWs by a greater proportion of young people in Guernsey seems to be a far greater awareness of motorcyclists when they get into cars later, thereby enhancing safety on the roads for all.

If we adopted a similar concept here and allowed 14 year olds to ride mopeds then we believe the number of students choosing to move to PTWs will increase as parents find the related costs more palatable with the resulting fall in schools traffic and a subsequent reduction in traffic congestion.

One option here would be to pursue the zero emission goal and restrict 14 year olds to electric mopeds only - thereby using this as a 'teaser' to encourage the younger generation to truly lead by example by committing to clean, green, transport.

Again this could be achieved by the introduction of a new 'electric moped' licence category.

These ideas will not only assist in a transition to green, low carbon or carbon neutral transport but also has the potential to reduce traffic congestion and demand for parking – it's a win win situation all round.

Sometimes the solution to a problem needs a broad approach and should not simply focus closely on one specific issue. These ideas potentially go beyond the Carbon Neutral Roadmap and stray into other, wider, traffic policy areas. We do not believe they should be discounted on that basis and the bigger picture needs to be considered.

We would be more than pleased to discuss this further if required and can be contacted on [REDACTED]

[REDACTED]

Word count 1083

## Appendix 12.8: Blue Marine Foundation written submission

John Young  
Minister for the Environment  
Ministerial Offices  
19-21 Broad Street  
St Helier  
Jersey  
JE2 3RR

Dear Minister,

Please find below the consultation response from Blue Marine Foundation (BLUE) to Jersey's Carbon Neutral Roadmap. It is BLUE's belief that if Jersey is to achieve carbon net neutrality, adequately mitigate for climate change and encourage a localised food chain, a crucial first step is the further protection of its marine environment. We propose the establishment of a Marine Park to help achieve these and other benefits, including eco-tourism, economic and human wellbeing.

In-line with global protection targets, a Marine Park should cover at least 30 per cent of Jersey's territorial waters. Specifically, it should incorporate sensitive, high biodiversity, high carbon habitats. It should be closed to inappropriate development and activities that disturb the seabed, releasing carbon stores.

This 'seascape' carbon approach would be a world-first and could support Jersey in meeting its net zero commitments in a highly innovative way. BLUE would like to support leading blue carbon scientist Professor [REDACTED] to adapt the IUCN Nature-based solutions guidelines, using the considerable scientific work conducted by the Government of Jersey to allow accurate verification of blue carbon from the Jersey seascape. This could set Jersey at the forefront of carbon neutrality and create a conservation template for other governments to use.

More detail on these points and their relevance to the policies included in the Carbon Neutral Roadmap is included below.

Yours sincerely,

[REDACTED]

[REDACTED] Blue Marine Foundation

## Policy EN5: Blue carbon, biodiversity and sequestration

### An ambition to double the extent of seagrass beds

While BLUE welcomes the ambition to double the extent of seagrass beds in Jersey's waters, a carbon neutral roadmap and strategy should also include recognition, protection and objectives to increase the area covered by all blue carbon/high-biodiversity habitats. These should include maerl beds (recent studies of which indicate are a high blue carbon habitat<sup>1</sup>), kelp forests (which support complex food webs through primary production, habitat provision and act as a carbon transport pathway to marine sediments<sup>2</sup>) and marine sediments themselves (which are well-established as being the largest store of organic carbon on the planet). An effective mechanism to protect a variety of habitats is through the designation of protected areas, such as a Marine Park, which are ecosystem-based.

Policy EN5 references the promotion of *'Jersey as a centre of excellence for blue carbon sequestration'* however it must be noted that restoration of seagrass alone will not result in the additionality required for carbon credits. The ability to create carbon credits and therefore an offsetting scheme requires the removal of damaging activities (in the form of disturbance i.e. dredging, sediment dumping etc.) from a habitat. Credits cannot arise from seagrass restoration in areas that are already closed to these pressures or are under no existing pressure, as no additionality will take place.

**RECOMMENDATION:** The Jersey Carbon Neutral Roadmap should include aims for protection and growth of all high carbon habitats (not seagrass alone). Protection of a variety of habitats should be achieved through ecosystem-based protection measures such as designation of large areas of protection. In order to achieve additionality and generation of a carbon credit scheme, the Government of Jersey must combine their aim of seagrass restoration with the removal of pressures (i.e. through designation of a Marine Park) to claim carbon credits.

Tackling the climate emergency by using nature-based solutions that also address the biodiversity crisis provides multiple benefits on land and at sea

And

### Develop a Marine Spatial Plan

Protecting the seabed and other carbon storing habitats from inappropriate development and damaging activities would cut off a major direct source of emissions and allow those carbon stores to rebuild. Strategic Policy 1 within the Carbon Neutral Roadmap states that *'Jersey will follow an emissions reduction pathway in line with our commitments under the Paris Agreement'* which will *'stay in line with, and respond to further evidenced change in, science-based global emissions reduction targets that are needed to limit global warming to 1.5°C'*.

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<sup>1</sup> <https://marine.gov.scot/sma/assessment/case-study-blue-carbon-scottish-maerl-beds#:~:text=Assuming%20an%20area%20of%207.06%20km2%2C%20this%20would%20mean,of%20sediment%20of%20maerl%20beds.>

<sup>2</sup> [https://www.sciencedirect.com/topics/earth-and-planetary-sciences/kelp-forest#:~:text=The%20kelp%20forests%20provide%20several,and%20cultural%20\(ecotourism%20and%20recreational](https://www.sciencedirect.com/topics/earth-and-planetary-sciences/kelp-forest#:~:text=The%20kelp%20forests%20provide%20several,and%20cultural%20(ecotourism%20and%20recreational)

Recent analysis has shown that ocean-based climate solutions could resolve 21 per cent of the 'emissions gap' – the difference between our current global trajectory (that will result in more than 3°C of warming) and emissions consistent with limiting temperature increase to 1.5°C<sup>3</sup>.

Protection of Jersey's marine habitats through the development of a Marine Park will contribute to Jersey's Carbon Neutral Roadmap policies through several routes:

#### Enhanced Resilience to Extreme Climactic Events

Extreme storm events are expected to increase in frequency and intensity as a consequence of climate change<sup>4</sup>. Such events can cause considerable damage to sensitive marine habitats. Studies have demonstrated that recovery within MPAs is quicker than in areas with no protection from damaging activities, indicating that MPAs confer resilience to the habitats within them<sup>5</sup>.

#### Enhanced Ability of Habitats to Sequester Carbon Effectively

Blue carbon ecosystems (BCEs) are areas of highly productive coastal habitats. Their high carbon content means that their protection can substantially contribute to carbon drawdown. Conversely, their disturbance results in the release of greenhouse gases. While BCEs cover only 0.5 per cent of the sea floor (extending down to approximately 50 metres depth), they are estimated to contribute over 50 per cent of the global carbon burial in the ocean<sup>6</sup>. Further, effective protection designations can also increase the carbon sequestration capabilities of already degraded habitats by excluding the most destructive activities (such as bottom trawling) and allowing for rewilding of degraded areas of seabed habitat.

Therefore, MPAs (such as a Marine Park) not only allow for continued carbon sequestration in habitats in good condition but also allow for degraded habitats to improve the sequestration potential.

#### Reduced Emissions from Disturbance of Carbon Stores in Marine Sediments

It is well-established that marine sediments act as a globally significant carbon store, which can remain buried for millennia if left undisturbed. Upon disturbance, these sediments release CO<sub>2</sub> into the water column<sup>6</sup>. This contributes to climate change through several mechanisms. Firstly, it is believed that a substantial proportion of this CO<sub>2</sub> is released from the ocean to the atmosphere. Secondly, the addition of this CO<sub>2</sub> to the water column contributes to ocean acidification, harming wildlife and disrupting the food chain<sup>6</sup>. Closing areas of known high carbon marine habitats to bottom-towed fishing and other disruptive activities is therefore crucial for:

1. Cutting emissions caused by these activities, reducing Jersey's gross carbon emissions
2. Allowing marine habitats to sequester carbon through lack of disturbance.

#### Enhanced Ability of The Ocean to Absorb Atmospheric CO<sub>2</sub>

It is well-understood that the ocean absorbs vast quantities of atmospheric CO<sub>2</sub>. A 2021 UNESCO report highlighted that '*Without the ocean and land sinks, atmospheric CO<sub>2</sub> levels would be close to 600 ppm, compared to the annual average in 2018 of 409 ppm*'<sup>7</sup>. However, the ocean's ability to

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<sup>3</sup> <https://www.wri.org/insights/turning-tide-ocean-based-solutions-could-close-emission-gap-21>

<sup>4</sup> <https://link.springer.com/article/10.1007%2Fs00382-014-2329-8>

<sup>5</sup> <https://doi.org/10.3389/fmars.2021.671427>

<sup>6</sup> <https://www.nature.com/articles/s41586-021-03371-z>

<sup>7</sup> <https://unesdoc.unesco.org/ark:/48223/pf0000376708>



absorb CO<sub>2</sub> is not infinite. Increased CO<sub>2</sub> in the water column (for example, when caused by activities that disturb, and mobilise carbon from, marine sediments) reduces its capacity to absorb CO<sub>2</sub>, hampering its ability to act as a buffer for anthropogenic emissions.

Recent estimates suggest that the amount of CO<sub>2</sub> released into the water column by bottom-towed fishing alone is equal to around 15–20 per cent of the amount absorbed by the ocean from the atmosphere<sup>6</sup>. It is clear that these activities comprise management and policy changes that will have huge impact in reducing emissions.

**RECOMMENDATION:** Jersey's Carbon Neutral Roadmap and Marine Spatial Plan should include the designation of a Marine Park covering high value habitats to:

- increase carbon sequestration rates
- reduce emissions caused by the remobilisation of marine sediment carbon into the water column
- increase the ocean's ability to absorb atmospheric CO<sub>2</sub>.

#### Policy EN3: Developing Supply Chains and on-island Skills for a Suitable Economy

In order to boost the local supply chain and reduce food miles, the Government of Jersey should consider an initiative that promotes the purchase of local seafood. In an MPA on the south coast of England, the Lyme Bay Reserve, local fishermen operate under a voluntary code of conduct, operating static gear. Aside from the ecological benefits of this MPA, fishermen operating under a voluntary code of conduct in the Reserve sell their catch under a 'Reserve Seafood' label. The initiative has been a key case study in demonstrating the ability to foster support for local produce.

Jersey faces an opportunity to adopt such a scheme, reducing food miles within the seafood sector, and supporting local business through consumption of seafood on the island from locally caught, low-impact fish.

**RECOMMENDATION:** Jersey's Carbon Neutral Roadmap should include schemes to boost local food consumption, particularly when grown or harvested using low-impact, low-carbon methods.

## Appendix 12.9: Cherry Godfrey written submission

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** 01 February 2022 11:14  
**To:** Climate Emergency  
**Subject:** The Path to Carbon Neutrality

#### The Path to Carbon Neutrality

Good morning to you,

I am writing in response to your invitation for comment on the Carbon Neutral Roadmap.

I wanted to make you aware that Cherry Godfrey is able to assist in this pathway and have experience in the administration of energy efficient solutions.

Within our finance arm, Cherry Godfrey works with many Jersey companies to offer incentivised finance solutions for domestic and commercial 'green energy' loans. This ability would marry well with the government grant scheme and Cherry Godfrey could solve a potential 'roll out' solution for your offices.

I would welcome a VC with your officers there to elaborate further. Perhaps we can put something in our calendars in the near future?

I look forward to hearing from you.

Thanks and regards,

[REDACTED]  
**Cherry Godfrey**  
PO Box 13, 1 Fountain Street, St. Peter Port, Guernsey, GY1 4AQ  
[REDACTED]

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Thank you for taking the time to discuss the draft Carbon Neutral Roadmap with the Channel Island Insurance Institute. As an eco active business Crawford & Company take the issue of climate change extremely seriously and therefore welcome the opportunity to give feedback as part of the consultation.

In 2019 Mark Carney, the then Governor of the Bank of England gave a speech during the [UN Secretary General's Climate Action Summit 2019](#). This speech considered the role of insurance in smoothing the transition to a 1.5 degree world. He pointed out that Insurers are aware that the physical risks of climate change are being felt across the globe with a rise of extreme weather events. In Jersey we are already seeing the impacts of more extreme weather. Dealing with a flood or other weather-related claims can be extremely emotional for those affected with some Islanders not having adequate insurance – or even contents insurance at all. Jersey's Carbon Neutral Strategy has a Just Transition as one of its 5 principles so it is important to remember those who may struggle to insure their homes.

Mark Carney also pointed out that the insurance industry has deep risk management expertise and long-term perspective. It is therefore not surprising that as a Jersey based loss adjusting firm we recognise the importance of Jersey's draft Carbon Neutral Roadmap. We support that GOJ are tackling carbon reduction/climate change as we experienced significant expense on more extreme weather incidents. The Jersey Shoreline Management Plan (published in 2020) aims to ensure that our coastal defences continue to protect the island over the next 100 years. This is really important for the Insurance sector as rising sea levels and more rainfall will increase the risk of flooding and water damage in some areas of Jersey.

Insurance companies pay for reinstatement works. So, Policy HT2 – Update building bye-laws is especially relevant. We need to better understand what the proposed changes will look like. What is the detail and how far are GOJ going with the building byelaws for improving insulation standards and energy efficiency and what that knock on will be for cost of claims for building repairs. This policy could have massive impact on claims spend. Going forward it is vital that the Insurance sector be involved in the bye law changes so the insurance market can have their say.

There were 26 water pollution incidents reported to the Government of Jersey in 2021. We welcome a move away from oil heating systems – this will lead to a reduction in the number of oil claims which are not only expensive but cause environmental damage.

We very much welcome the opportunity to take part in the consultation on the Draft Carbon Neutral Roadmap and look forward to continued involvement as you further develop the long-term climate action plan.

WORD COUNT: 468

## Appendix 12.10: Crawford and Company written submission

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WORD COUNT: 468

## Appendix 12.11: Cycle4Jersey written submissions



Deputy John Young

Minister for the Environment

Broad Street

St Helier JE2 3RR

Date: 31 January 2022

By email to: [climateemergency@gov.je](mailto:climateemergency@gov.je)

Dear Deputy

### **Draft Carbon Neutral Roadmap: Submission from Cycle 4 Jersey**

I write on behalf of Cycle 4 Jersey (**C4J**), an advocacy group representing people who ride bicycles in Jersey. We want to see a diverse range of people riding bikes, having fun, enjoying Jersey and contributing to a happier, healthier more and more sustainable Island – a better place for us all to live and work.

This feedback to the draft Carbon Neutral Roadmap consultation (**CNR**) is split into **two submissions**:

1. Firstly, the cover letter contains our **overarching feedback** on the CNR (word count: 752).
2. Secondly, the response detailed in the Appendix to this letter represents C4J feedback on the specific **transport policies** (TR1 to TR11) of the CNR (word count: 1,110)

Whilst C4J does not have a formal membership structure, this submission is based on discussions within a community of active, like-minded participants in the group.

### **Submission 1: C4J's position on the overarching CNR (word count: 752 words)**

C4J is broadly supportive of the policy objectives and signalling of the CNR. It is great to see Jersey committed to a globally recognised pathway aligned with the Paris Agreement.

However, there is no viable pathway to carbon neutrality in Jersey, or in other developed economies, without a major shift towards cycling and other active travel options to displace the private car on short journeys. Moreover, [evidence from other countries](#) shows that measures such as incentives for the purchase of EVs are not efficient and can result in high implicit abatement costs relative to emissions reductions. Given the limited resources allocated to the CNR and the ongoing funding gap for our carbon neutral journey, what is needed is a holistic view of transport as Jersey's largest source of emissions to make sure that we get value for money.

In our view, the draft CNR incorrectly targets the electrification of the current vehicle fleet as an immediate priority and a quick win. The level of resourcing allocated to this strategic priority places it on the same level as the decarbonisation of heating and building. But in our view, policies

surrounding the electrification of the vehicle fleet will deliver poor value for the taxpayer and will embed current practices and behaviours for decades to come. Ultimately, this will make to the long-term switch to more active and public travel all the more expensive and complex - undermining both the overall policy objectives of the CNR and the ability to deliver a successful sustainable travel roadmap.

Indeed, the answer to the climate crisis is not different cars but different behaviours. That is why it is disappointing to note that active travel is currently relegated under the CNR into a largely unfunded and undeveloped line item, connected to the “business as usual” of the sustainable transport roadmap (which does not yet exist). As drafted, the CNR implies that funding a switch to EVs is the best use of public funds at this time and one of the key pillars in terms of solving the climate crisis.

This ignores the fact that the age of reliance on the private car must come to an end. Active travel cannot be peripheral or a “nice to have” on our net-zero pathway – it must be front and centre, right from the start. The CNR seems to suggest that the shift to active travel is much harder to achieve and should therefore be deferred to a later date. That cannot be right, when we are staring at a climate emergency that requires immediate actions. Indeed, we would argue absence of a detailed strategic policy focus in the CNR on active travel is major omission that limits Jersey’s chances of staying within the commitments of the Paris Agreement.

The excessive focus on electrification of the private vehicle fleet also ignores the fact that, as things stand, it is a policy which effectively exports Jersey’s CO2 emissions to other countries - in particular those involved in the electric vehicle supply chain. It does nothing to address other externalities associated with EVs and the private car more generally recognised in the CNR – from pollution (globally, as well as noise and fine particles at a local level), to the corrosive effect on public health associated with inactive lifestyles.

But perhaps worst of all, as drafted the CNR hardwires for years to come the current negative “feedback loop” whereby active travel is seen as too dangerous or inconvenient by the majority – contributing to ever more congestion and cementing the behaviours that have got us into the crisis in which we find ourselves. This in turn makes it even more difficult (and expensive) to deliver on the long-term societal changes outlined in the CNR, including the switch to “low carbon lifestyles” it seeks to promote.

In short, the policy of funding a switch to electric vehicles without a major policy focus on urgently developing active travel running alongside it with equal weight, funding and urgency, puts our ambitions for net-zero and a just transition out of reach. There is a climate emergency – this requires bold decisions that tackle the root of the problem. These decisions need to be taken now, with a fast roll-out of active travel policies as recommended in the Annex to this letter, where we make specific comment on the Transport policy section of the CNR.

The contributors to this C4J response would be pleased to discuss in further detail how we can put active travel front and centre of the Government’s plans for net-zero.

Your sincerely

A solid black rectangular box used to redact the signature of the sender.

[contact@cycle4jersey.org](mailto:contact@cycle4jersey.org)

## Appendix

### Submission 2: Feedback on Transport Policies

Word count (comments column only): **1,110 words**

Transport Policies			
#	Policy title	The Government of Jersey will...	Comments from Cycle 4 Jersey Participants
TR1	Speeding up adoption of electric vehicles	<ul style="list-style-type: none"> <li>• <i>Subsidise the cost of an electric vehicle at the point that it is first registered on the Island (for both new and imported second-hand vehicles)</i></li> <li>• <i>Continue to offer subsidised public parking until a new parking plan is in place (as required by the Sustainable Transport Policy)</i></li> <li>• <i>Exempt electric vehicles from planned increases in vehicle emissions duty</i></li> <li>• <i>Work with Jersey Electricity to agree a scale-up plan for electric vehicle charging infrastructure that:</i> <ul style="list-style-type: none"> <li>○ <i>subsidises the cost of domestic electric charging infrastructure</i></li> <li>○ <i>continues to deliver off-street electric vehicle charging points across the Island</i></li> <li>○ <i>trials on-street charging infrastructure to identify the right solution for Jersey, including exploring consequential amendments to planning regulation where appropriate</i></li> <li>○ <i>improves the visibility of charger availability across the Island</i></li> </ul> </li> </ul>	<p>Speeding up the adoption of electric vehicles will help us not achieve carbon neutrality on its own and may in fact slow it down by entrenching the Island's existing behaviours. As a result, TR1 cannot be a standalone policy. It must be accompanied by incentives and restrictions that accelerate a shift for private users away from cars wherever possible. We detail such possible measures in our response below.</p> <p>Moreover, £3,500 is unlikely to be enough to overcome the price differential with ICE cars for lower income households. It is therefore primarily going to benefit middle earners buying a used EV off-Island and importing it to Jersey – people who in due course probably would have bought an EV anyway.</p>



TR2	Vehicle scrappage incentive	<p><i>Introduce a vehicle scrappage scheme to target the most polluting vehicles. Petrol or diesel cars or small vans that are over 10 years old (manufacture date 2012 or earlier) will receive a £500 green living credit if they are scrapped.</i></p>	<p>This another scheme that is mainly likely to benefit those who would have scrapped their vehicle anyway – e.g. those with vehicles lying unused and/or unroadworthy – rather than vehicles that genuinely need taking off the road.</p> <p>A more effective approach would be to disincentivise the use of undesirable vehicles such as older, heavier and more polluting models. This could be achieved by a range of measures:</p> <ul style="list-style-type: none"> <li>- Introducing VED on an annual basis or on transfer of second hand cars, based on weight, EURO pollution standard and CO2, etc.</li> <li>- Bringing in clear air zones around schools and in town/urban neighbourhoods (like the French Crit’Air system)</li> <li>- Linking parking charges to the emissions of the vehicle, with an increasing scale for the most polluting vehicles (effectively, an extension of the discounted parking for EVs in place currently)</li> </ul> <p>See also comments on TR6, TR8, TR9 and TR10, noting that we must provide viable alternatives to drive behaviour change.</p>
TR3	Supporting transition fuels	<p><i>Bring forward a proposal in the Government Plan 2022 to subsidise the rate of fuel duty charged on second generation renewable diesel, by 32ppl until 2026.</i></p>	<p>This should only apply to commercial vehicles in Jersey and not to the wider fleet. It must also be linked to a robust definition of “second generation bio-fuel” that excludes fuel from food crops, palm oil etc.</p> <p>In any case, it needs to be part of managed transition away from ICE vehicles – even in the commercial sector, where increasingly the use of alternatives such as cargo bikes is being seen in other jurisdictions as a viable option for “last mile” delivery. To achieve</p>

			<p>this, the subsidy could be tapered so as to decrease over time, anticipating the greater availability of electric options in the next ten years.</p>
TR4	VED incentive	<p><i>Apply no level of Vehicle Emissions Duty on zero carbon vehicles and increase Vehicle Emissions Duty on all domestic petrol and diesel vehicles each year until at least 2030.</i></p>	<p>This is sensible, but we would encourage the introduction of annual or VED or a similar tax on transfers of second-hand vehicles in Jersey, to gradually penalise more polluting models and make it more likely these will eventually be scrapped. See comments above on TR2. This is because fuel duty/impots does not currently cover the full cost to society of vehicle use (when factoring in all externalities) and it would be just therefore to introduce a “polluter-pays” approach to remove this subsidy of vehicle use.</p> <p>In time, taxes such as VED or annual charges could be replaced by a more targeted and fair road usage charge, based on data collected from vehicles. That should be a long-term objective, and one which will ultimately replace duty lost from the switch to EVs.</p>
TR5	End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030	<p><i>Bring into force legislation that prohibits the importation and registration of petrol and diesel cars and small vans that are new Island in 2030 at the latest and will seek to extend this to other categories of vehicle at subsequent dates between 2030 and 2040.</i></p>	<p>We should be moving faster than the UK. Otherwise, there is a real risk that Jersey will become a “dumping ground” for vehicles from the UK that, through a combination of consumer choice, subsidies and the introduction of “clean air zones”, are becoming unsaleable in the UK.</p> <p>We suggest bringing this date forward for private vehicles and for small vans (under 3.5t), e.g. by introducing an outright ban on the importation of vehicles with CO2 emissions over 120g/km by 2025, followed by an outright ban on importation of petrol and diesel vehicles (including hybrids) by 2028.</p>

			This needs to be coupled with other sustainable travel policies (as below) but also with a re-skilling of garage technicians to service electrified vehicles.
TR6	Review Roads Law	<i>Review the legal framework for Jersey's highways to ensure they are fit to safely enable low-carbon, sustainable and modern travel and transport.</i>	<p>Any review of the Roads Law should form part of broader review that looks at making our legal framework on road safety fit for purpose. This should capture:</p> <ul style="list-style-type: none"> <li>- Embedding road design principles that give protection to vulnerable road users (including so-called Dutch design principles for cycle lanes etc.) for both new developments and as part of a programme of road upgrades that gradually prioritises active travel over private cars</li> <li>- Uniformity in roads policies between Parish and States roads</li> <li>- Giving effect to the proposals for a network of Designated Lanes (under P79/2020) to form a legally protected active travel network</li> <li>- Review of changes to the Highway Code, to ensure the hierarchy of users and other key measures for vulnerable users are placed on a statutory footing in Jersey</li> <li>- Proposals for a "<a href="#">Freddie's Law</a>" to remove loopholes for drivers who fail to stop at the scene of an accident</li> <li>- Better enforcement of speed limits, through the introduction of speed cameras</li> <li>- Creation of a penalty points system for drivers</li> <li>- Ensuring Jersey law is properly adapted to the introduction of Intelligent Speed Assistance on vehicles,</li> </ul>

			as mandated under the newly revised EU General Safety Regulation (661/2009/EC)
TR7	"Green" number plates for electric vehicles	<i>Ensure that, from the 1 January 2023, owners of electric vehicles will have the option to display a number plate that features a green marker as a visible signifier of their contribution tackling the climate emergency.</i>	This sounds fine in principle, but why not mandate black number plates to "shame" higher polluting and larger, anti-social vehicles?
TR8	Sustainable Transport Roadmap	<i>Complete the rapid plans required by the Sustainable Transport Policy and, drawing on these, publish a Sustainable Transport Roadmap in 2022.</i>	<p>In our view, this is the of the most important pieces of our "de-carbonisation jigsaw". In that context, EVs are potentially at best distraction and at worst a hindrance.</p> <p>Currently there are no clear plans to fund this vital policy area. With a huge funding gap already baked into the CNR, where will this money come from?</p> <p>As regards the detailed action plan itself, here are some high impact suggestions we believe need to feature as part of our most urgent actions in this space:</p> <ul style="list-style-type: none"> <li>• Convert multi-storey parking spaces to offer sheltered bike facilities with CCTV, lockers etc.</li> <li>• Tax corporate parking spaces as a benefit in kind, removing the exemption under Schedule 2 of the Income Tax (Jersey) Law 1961 and introducing further tax breaks for switching car spaces to cycle parking</li> <li>• Mandate school travel policies that prioritise active travel and public transport, moving away from "drive and drop" as the default choice</li> <li>• Government backed car-pooling arrangements, using App-based technology and backed by tax incentives</li> <li>• Introduce low emission zones around known hotspots and sensitive sites (schools, centre of town, urban areas)</li> </ul>

			<ul style="list-style-type: none"> <li>• Complete the Eastern cycling route and connect existing cycle paths to form a coherent network</li> <li>• Adopt a network of “Designated Lanes” (under P79/2020) with physical restrictions such as barriers to reduce rat-runs</li> <li>• Changes to planning rule to mandate cycling facilities for commercial buildings (existing and re-fits) and new builds residential properties (e.g. reduce car parking ratio in exchange for car sharing (Evie) spots and bike racks)</li> <li>• Mandatory developer contribution to active travel infrastructure in the form of a hypothecated levy</li> </ul>
TR9	Bus service development trials	<i>Implement a programme of bus service development trials 2022-2024.</i>	<p>We are very supportive of the bus service, but we believe our offer must adapt to changing habits and to meet the challenge of sustainable travel. We need to be creative as a small Island, looking at solutions such as “Reggae bus” services (e.g. smaller minibuses and shared taxis) with demand-driven mobility services harnessing the use of technology and apps to deliver convenient sustainable transport.</p> <p>We also strongly support the introduction of electric buses, as a priority on the two routes (1 and 15) that are most suited to currently available vehicles.</p> <p>We also believe schools should have mandated targets for public transport and active travel amongst pupils, as part of the review of school travel plans (see comment under TR8).</p>
TR10	Active Travel	<i>Implement further active travel initiatives in 2022, ahead of development of the full Sustainable Transport Policy.</i>	<p>The focus in 2022 needs to be on rolling out a detailed, funded Sustainable Transport Roadmap, to avoid the pitfalls associated with over-reliance on EVs highlighted above.</p>

			<p>That should not detract, however, from the need to make quick progress on some “easy wins” in 2022. These could include:</p> <ul style="list-style-type: none"> <li>- Create a tax and legal framework to support “Cycle to Work” schemes. This would create tax breaks for employers and employees to buy a bike for cycle commuting</li> <li>- Introduce a “cycling czar” role in Government to champion the needs of bike users and drive coordinated policy making across departments</li> <li>- Bikeability initiatives to improve cycling infrastructure and access for riders of all abilities (this could include a review of existing bike shelters)</li> <li>- Publicise the Highway Code changes through a campaign of road user education</li> <li>- Work with schools on emissions measurement and education, partnering with providers like Ricardo to provide real-time onsite monitoring facilities (e.g. at drop-off time) to use as an educational tool for students</li> </ul>
TR11	Emissions from aviation and maritime transport	<i>Work with the Ports of Jersey to reduce emissions from aviation and marine transport, in line with the Jet Zero scenario 2 emissions targets and obligations under the MARPOL treaty</i>	<p>Jersey should introduce punitive taxes or levies on:</p> <ul style="list-style-type: none"> <li>- marine fuel used by private boat owners</li> <li>- private or business aviation</li> </ul> <p>The proceeds would be used to fund the Island’s climate emergency response.</p>

## Appendix 12.12: Dark Green Carbon Farm Foundation written submissions

**From:** [REDACTED]  
**Sent:** 25 January 2022 23:06  
**To:** Climate Emergency  
**Subject:** Re: Climate Positive Road Map for Jersey.

**Categories:** Consultation response

Thank you, [REDACTED]

Thank you and please thank [REDACTED].

As discussed [REDACTED] I'd be grateful if you put the [REDACTED].

This submission; is intended to clarification confusion to the terms Net Zero; Carbon Neutral. Carbon reductions, carbon avoidance and carbon removals, which I picked up on.

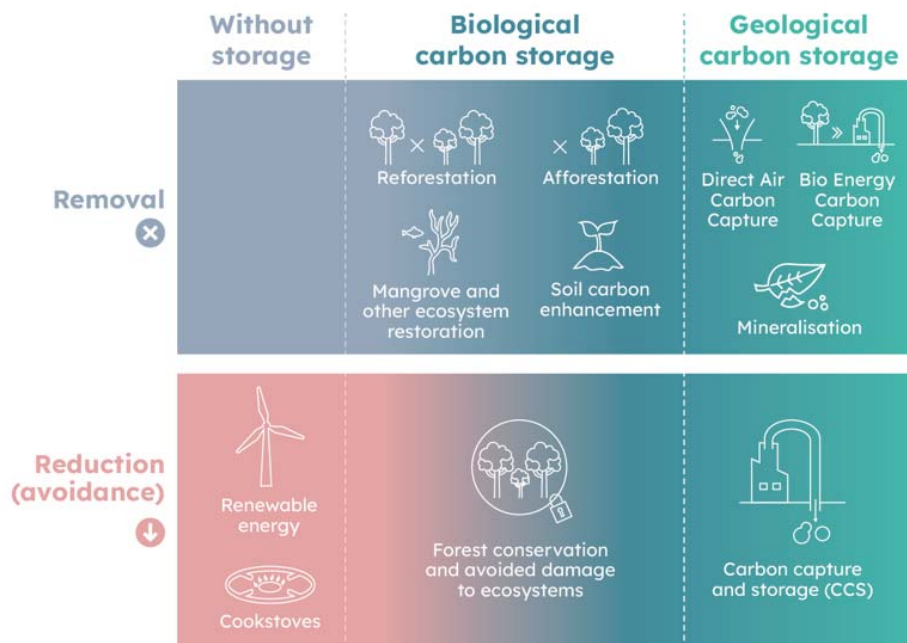
The diagrams below are extracted from <https://sciencebasedtargets.org/resources/files/Towards-a-science-based-approach-to-climate-neutrality-in-the-corporate-sector-Draft-for-comments.pdf>

Term	Scope of climate forcers	Definition from IPCC SR15
<b>Carbon neutrality or net-zero CO<sub>2</sub> emissions</b>	CO <sub>2</sub> emissions	Net zero carbon dioxide emissions are achieved when anthropogenic CO <sub>2</sub> emissions are balanced globally by anthropogenic CO <sub>2</sub> removals over a specified period.

### The NET-zero Accounting Policy Confusion ?







It seems most of the strategies discussed [REDACTED] in Jerseys route to Net Zero fit into reduction (avoidance) category not removal category definition of the IPCC SR15 paper, which if right could significantly impact Jerseys actual Net Zero journey!

Kind regards

[REDACTED]

---

**From:** Climate Emergency  
**Date:** Tuesday, 25 January 2022 at 15:05  
**To:** [REDACTED]  
**Subject:** RE: Climate Positive Road Map for Jersey.

Hi [REDACTED]  
 Thank you for sending through your written submissions on the draft Carbon Neutral Roadmap. We [REDACTED]  
 [REDACTED]. Please can you let us know which [REDACTED]

Many thanks

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 25 January 2022 06:21  
**To:** Climate Emergency  
**Subject:** Climate Positive Road Map for Jersey.

Hello.

Post COP26 a growing number of people connected to carbon removal credits are keen to see Jersey moving towards mandatory climate-related financial disclosures; based on the Task Force on Climate-related Financial Disclosures report designed to help nations meet their net-zero ambitions. If Jersey choses to go this way there is a growing understanding that the policy will deliver a regenerative statement to international investors that Jersey is a leading sustainable Island to do business in.

Jersey won't be the first jurisdiction shifting towards mandatory climate reporting for companies and financial institutions. In October, the UK government announced formal plans to [introduce legislation requiring mandatory climate-related disclosure](#), and the US SEC Chair Gary Gentler revealed earlier this year that he aims to [have proposed rules in place](#) for mandatory climate risk reporting by companies by the end of this year. [On December 16 2021, Prime Minister Trudeau issued a mandated letter to Canadian Ministers](#) to support TCFD's.

How many carbon credits can be retired into Jersey's soils to mitigate the worst impacts of climate change? Jersey's Soil Organic Carbon across Agricultural Land is approx. 3% >. Natural habitats average 17.5% SOC. (NRM Labs). Each 1% increase in SOC in Jerseys soils draws down 5 (metric tonnes) of CO<sub>2</sub>e. Since all Soil Carbon is put there by the magic of photosynthesis, we know those 5 tonnes of carbon dioxide came from 3.67 times as much carbon dioxide.

So an acre of topsoil with 1% organic matter has sequestered 18.35 tonnes of CO<sub>2</sub>.

If 3000 hectares of agricultural fields average 3% and have the capability of increasing to 17.5% or more, Jersey soils have the capacity of drawing down approximately ½ Jersey annual emissions annually; while delivering additional benefits of improved water infiltration and retention, biosecurity, soil porosity, stability and nutrient availability, which all build Jersey's resilience to impacts of climate change – drought, flood.

Of course, this is reliant on policy not to seal land with concrete, which a growing number of countries are putting in place as part of their Paris Climate Change Agreements.

It's also our hope Jersey would consider a no seal strategy on land by 2030 to keep our sinks active.

Kind regards

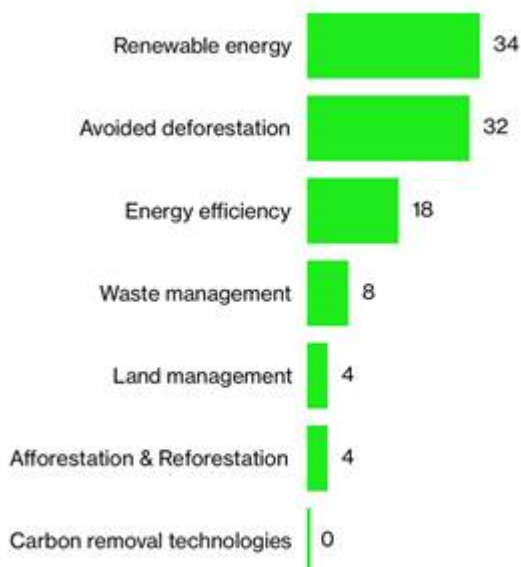


Dark Green Carbon Farm Foundation.

## Paltry Offering

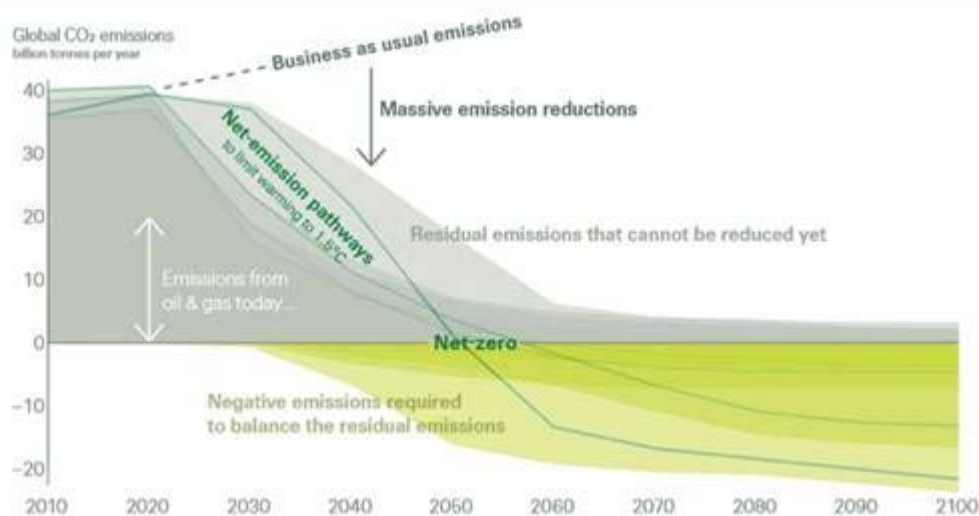
Less than 5% of offsets actually remove carbon dioxide from the atmosphere

■ Share of total %



Source: TSVCM inventory analysis for 2020

Note: Avoided emissions credits prevent hypothetical polluting activity



Source: Swiss Re, based on *Global Warming of 1.5°C*, IPCC, 2018 (overlap of the scenarios P1-4).

\*\*\*\*\*  
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Contract : This email does not form any binding agreement unless it is supported by an official States of Jersey purchase order form.

Content : All States information systems may be monitored to ensure that they are operating correctly. Furthermore, the content of emails and other data on these systems may be examined, in exceptional

[REDACTED]

**From:** [REDACTED]  
**Sent:**  
**To:** Climate Emergency  
**Subject:** Climate Positive Road Map for Jersey.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** [REDACTED]

Hello.

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Of course, this is reliant on policy not to seal land with concrete, which a growing number of countries are putting in place as part of their Paris Climate Change Agreements.

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Kind regards

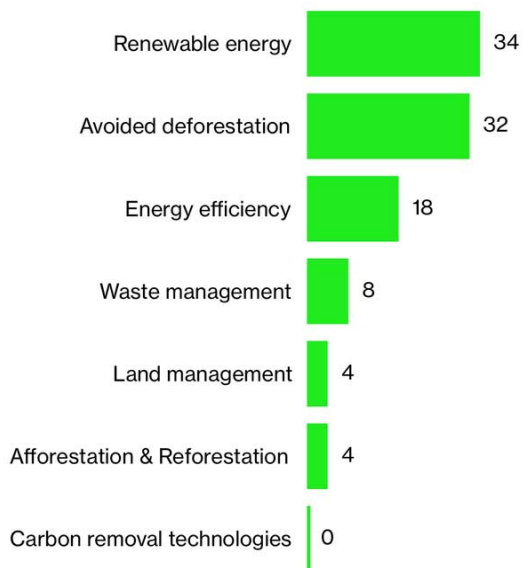
[REDACTED]

Dark Green Carbon Farm Foundation.

## Paltry Offering

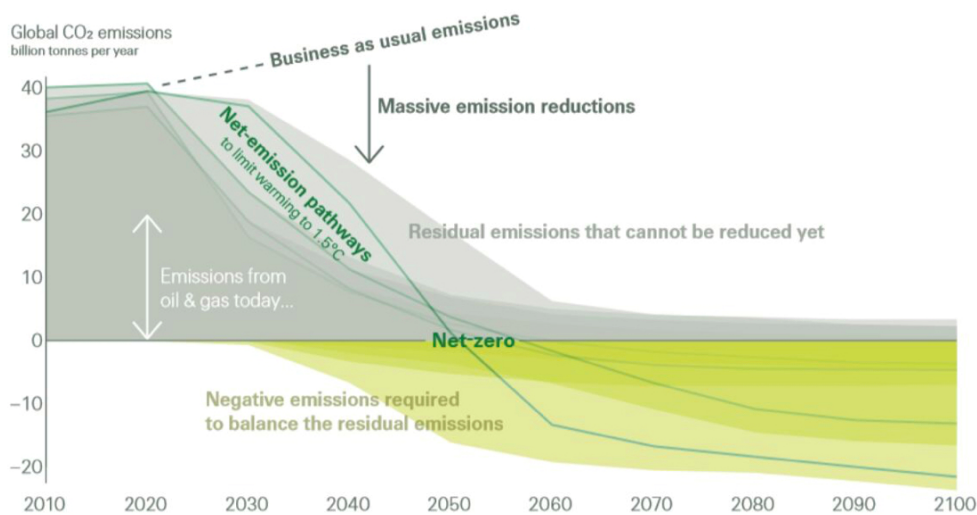
Less than 5% of offsets actually remove carbon dioxide from the atmosphere

■ Share of total %



Source: TSVCM inventory analysis for 2020

Note: Avoided emissions credits prevent hypothetical polluting activity



Source: Swiss Re, based on *Global Warming of 1.5°C*, IPCC, 2018 (overlap of the scenarios P1-4).

## Appendix 12.13: Derek Warwick Honda

### Minister for the Environment

19-21 Broad Street  
ST HELIER  
JE2 3RR

### Derek Warwick Honda Carbon Neutral Roadmap Submission for Transport Policies

The Motor Trade employs more than 600 people and we must be careful not to jeopardise the livelihood of these people. Figures from FOI, 21<sup>st</sup> December 2020. On Friday 28 February 2020 [REDACTED] [REDACTED] JMTC Council members attended a meeting with the Infrastructure Minister, Deputy Kevin Lewis, he promised to continue consultation on both the STP and CNS on an ongoing basis but despite requests for further meetings the only consultation we had prior to the release of the CN Roadmap was an STP meeting with [REDACTED] on 22<sup>nd</sup> April 2021. It is abundantly clear that had our offer on Consultation been accepted some the objectives and figures published may have been realistic rather than reinforcing the fact that elements of the plan are risible which makes the Minister look a throttlebottom.

### TR1 Speeding up the adoption of electric vehicles

1. "For every EV subsidy a fossil fuelled car must be removed from the road." How is this going to work? As part exchanges are likely to be of a significant value and not ready to scrap although these part exchanges are likely to be purchased by owners of older more polluting vehicles who may well scrap their current cars.
2. Prior to grants commencing customers will not want to by an EV until the scheme is launched, conversely the trade will not import any prior to launch so there will be a period prior to launch when no EV's will be sold and following launch it will take time for dealers to source EV's for stock. It is imperative that the grant can be claimed for stock in trade cars so we can hit the ground running. It would also make sense to allow retrospective claims at launch to maintain/increase EV purchase in the prevailing months.
3. The purchase price cap of £30,000 is slightly too low as even a small modest Fiat 500 EV is over £30,000. We would suggest a price cap of £40,000 for cars and £50,000 for commercial vehicles like vans etc.
4. Although the Government expects price parity by 2027, we believe this will happen, but it will be achieved by the price of fossil fuelled cars raising to match EV prices which will not come down substantially like some people believe, if anything the price of EV will continue to increase as many manufacturers are currently subsidising the price to achieve CAFÉ targets.
5. We welcome the Charger subsidy of £350 although we are very cynical that enough households, especially those living in flats will have the ability to install charging points to achieve the volume of EV's required in the plan. We also understand that the current feed to many households is not of the capacity required to install a single phase 7.4kw charging point. This means most households will have to charge using a standard 3pin plug charger which is a potential safety risk if used with an extension lead.

### TR2 Vehicle scrappage incentive

1. While we welcome the £500 scrappage voucher scheme the mechanism to control this scheme must ensure that people are not scraping an old car that would be scraped naturally while continuing to drive a fossil fuelled car not registered in their name.

2. The budget of £410,000 less £500 x 500 cars scraped (£250,000) leaves £160,000 which we are told is for marketing and administration. Is spending almost 40% of the budget on this a prudent use of resources?

### **TR3 Supporting transition fuels**

1. We welcome the 32ppl subsidy on second generation renewable diesel although feel it should be implemented immediately rather than 2023 and should be raised to actually make SGRD cheaper than conventional diesel. The current impot duty on both SGRD and fossil diesel fuel is 56.5ppl.

### **TR4 Vehicle Emissions Duty (VED)**

1. We would certainly expect EV vehicles not to attract VED.
2. Many average family cars currently fall into reasonably high VED bands so we must be careful not to adversely affect income inequality.

### **TR5 End of the importation and registration of petrol and diesel vehicles that are new to the Island from 2030**

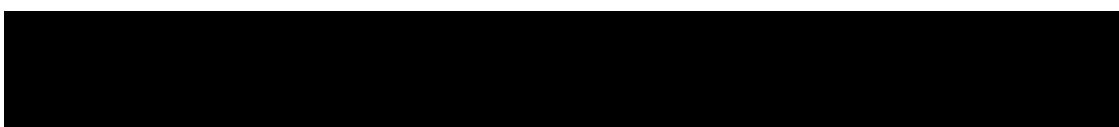
1. We agree with the ending the importation of pure petrol and diesel cars in 2030 but must ensure that the importation of Hybrid cars is still permitted until at least 2035 and 2040 would be preferable as these still offer a much better alternative to full fossil fuelled cars.
2. The Targets quoted in the SMART objectives of achieving 66% of all vehicles being fossil fuelled by 2025 is impossible and it is unlikely that this figure is achievable by 2030. DVS have confirmed that they had 127,661\* vehicles on their register at the end of 2021, of which 1365 were EV's. To achieve a figure of 34% EV by 2025 we will have to import 42,039 vehicles over 3 years equal to over 14,000 vehicles per annum. Below is a table of New and Used vehicles imported for the last 5 years which averages 6065\* per annum. We have no idea how this is going to increase to 14,000 per annum. In fact, even if this figure was achievable, we do not believe that the manufacturers will be able to supply this number of EV vehicles in the required timeframe.

	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	Average PA
New Vehicle Registrations	4364	3951	3455	2661	2627	3411
Used Vehicle Registrations	2833	2728	2704	2310	2695	2654
<b>TOTAL Vehicle Registrations</b>	<b>7197</b>	<b>6679</b>	<b>6159</b>	<b>4971</b>	<b>5322</b>	<b>6065</b>

\*Figures supplied by DVSD

Whilst we support the need for change to protect the environment for future generations, we must ensure that the targets are achievable and realistic, and we must also consider the natural direction the Motor Industry is heading with emissions and not waste tax payer money trying to achieve goals that to some degree will happen naturally without major Government intervention. Hopefully moving forward, the GOJ will more readily accept offers of consultation to produce a more workable Roadmap.

Contact details





# Appendix 12.14: Disability Inclusion Team written submission

## Disability Inclusion Team Feedback for the Carbon Neutral Roadmap.

The Disability Inclusion Team (Government of Jersey) reviewed the original Carbon Neutral Roadmap consultation draft document and wished to highlight particular areas which need to be considered within the context of disability. This should be read in conjunction with the consultation document.

Comments where additional thought might be considered or where highlighting issues to consider, are sequential following the original report contents.

### Funding a Just Transition

#### 1.13 Funding the transition could be particularly challenging for lower-income households in Jersey. (page 11)

Comment from the Disability Inclusion team:

*“This also needs to have a separate plan for people with disabilities as they are disproportionately impacted”*

### 2. Listening to Islanders and the evidence

**2.2 The development of the Carbon Neutral Roadmap has not been to professional research and analysis but has sought to apply – and further develop – a people-powered approach. The Carbon Neutral Strategy describes this as an approach that “explore(s) opportunities to put individual citizen and community action at the heart of our response, creating the conditions in which bottom-up initiatives flourish and Islanders support each other to change their behaviours and adapt to lower carbon lifestyles. (page 12)**

Comment from the Disability Inclusion team:

*Really important - we must all consider that people also have different needs and to ensure that 'must haves for people with disabilities are not automatically excluded or raised in costs without some rebalancing to ensure that the policies do not have the impact of lowering quality of life in ways that non disabled people do not have to. Examples can include:*

- Medical equipment - much is single use - this can impact in terms of disposal and user pays*
- single use items that were previously designed to assist disabled people - like plastic straws - being phased out or banned without the awareness that the alternative designs are usually not suitable, and we should still be able to have tools so that we can independently drink and eat*
- Transport and distance to walk - cars, mobility scooters, distance from car park to front door*

### The Carbon Neutral Strategy

#### Figure 2 How can we work together to become carbon neutral? (page 14)

Comment from the Disability Inclusion team:

*The disability strategy working group would like to be actively involved - we have over 50 people, many with lived experience of disability who want to improve and take part in all areas of island life - helping put inclusive design into policy*

### **Explore phase (page 15)**

Comment from the Disability Inclusion team:

See <https://www.hrw.org/news/2021/11/05/people-disabilities-needed-global-efforts-combat-climate-change>

*Quote “Disabled people won’t survive climate change if it isn’t in the plan for us to do so. And you can’t plan without us.”*

### **Figure 4: Encapsulates the ideas generated by Jersey’s Citizens’ Assembly on Climate Change (page 17)**

Comment from the Disability Inclusion Team:

*“NB - make sure all of your information and consultation is accessible.*

*Videos with BSL and captioning - alternative texts and descriptions of what images like this show.”*

### **Deliberation – Citizens’ Assembly on Climate Change (page 18)**

Question from the Disability Inclusion Team:

*“Was there anyone who was disabled? Including people with long term health conditions.”*

### **Listening to the Evidence (page 19)**

Disability Inclusion Team suggestion in relation to the use of Children’s Rights Assessments and that similar could be used to ensure people with disabilities are included within this:

*“Would like to include - the same as children and young people - listening to people with disabilities - this would also enable GoJ policy and process development to be inclusive by design and not have to retrofit disability access and reasonable adjustments as an afterthought or when they are found not to fit into the positive obligations of GoJ, services and employers to align with the legal requirements of the discrimination law - removing barriers - not just physical buildings, but accessible services, information and goods”*

*Use existing UN research and convention reports on the impact of climate change on people with disabilities and guidance on how to include PWD*

*Link to reports from United Nations:*

<https://www.ohchr.org/EN/Issues/HRAndClimateChange/Pages/PersonsWithDisabilities.aspx>

### **Local context (page 22 & 23)**

#### **Bridging Island Plan**

The Disability Inclusion Team have highlighted upcoming changes and things to consider – specifically around

**Introducing new Policies:** *“There have had to be several amendments to the bridging plan to ensure that disability, the disability strategy and the positive obligations under the discrimination law are included at design”*

**Sustainable Transport Policy – specifically around delivering new walking, cycling, and wheeling infrastructure:** *“remember that not all disabled people can take advantage of that or that differences in how people access say walking is different for some people - ie if you cannot see or can only walk 10 metres”*

**Active Travel Plan –** *“Active travel plan largely presumes everyone can walk or cycle or that hybrid electric bikes can be used by everyone”*

**Parking Plan –** *“A full review of parking - esp. blue badge and useability of spaces needs to be undertaken”*

### **Adaption and the Shoreline Management Plan (page 23)**

**3.20** Regardless of global and local efforts to reduce emissions and to mitigate further climate change, Jersey will have to adapt to its existing inevitable effects.

The Disability Inclusion Team wish to highlight that *“People with disabilities (including people with long term health conditions) are disproportionately impacted - evacuation of floods, difficulties with heat, traveling in adverse weather conditions”*

### **Strategic Policy 2: Island Energy Market (page 32)**

**4.24** This Strategic Policy describes how the first stage of the Carbon Neutral Roadmap will be supported with investments made from the Climate Emergency Fund. It also sets out the research into additional fiscal levers that ministers have endorsed and frames the longer-term financing challenge that will need to be addressed in the coming years.

The Disability Inclusion team wished to highlight that many people with disabilities will have additional energy needs and to ensure that:

*“Policies will need to design at a high-level protection so that people with disabilities are not disproportionately impacted in any fiscal levers - realising that many PWD will have larger energy consumption needs or fewer alternatives available. PWD also globally and locally are more likely to be in the lowest economic brackets, but also support needs to go up to middle earners who may still have considerable extra costs:*

*- extra electric costs - heating / cooling - from having lower tolerance to heat or cold*

*- the need for extra space - inside and out - extra room or place for medical equipment, sleep over carer,*

*-car parking - for visiting carers or transport for the PWD, mobility scooter parking and charging - and that it may need to be outside the front door.*

*-extra washing machine and drying use*

*- disposable / medical plastics that aren't disposed of as clinical waste but nonetheless can add up to a considerably larger waste size"*

#### **Strategic Policy 4: Policy programme and development (page 34)**

**4.26 The policy also requires steps to seek to ensure a Just Transition, in which the interests of both**

**future generations, and those currently reliant on polluting industries for employment, are considered. Neither group should be actively disadvantaged by being left either to live with the impacts of inaction now, or to bear a disproportionate burden of the costs to mitigate and adapt to climate change.**

*The Disability Inclusion Team also suggest that "really important to consider and that disabled islanders also work so need to consider adjustments in workplaces not disproportionately impacting them" [within this area of work.]*

**Strategic Policy 4 carbon reduction policies** (page 34) when addressing how policies funded from the Climate Emergency Fund will be developed and prioritized the Disability Inclusion Team wish to request *"Please can the disability strategy working groups be in this," recommending that the team: "Proactively go out and get PWD voices and opinions - standard consultation rarely captures these views and then there are unintended consequences of approaches" [when consultation occurs without a group of people impacted being involved in the development of future planning].*

**3.4 Principle 4 – Figure 9: The defining principles of the Carbon Neutral Strategy (page 36)** where *"we will make sure that everyone can play their part" the Disability Inclusion Team wish to highlight and address any presumptions "do not automatically assume with Disabilities cannot do this but ensure it can be individualised and not a one size fits all" to ensure that everyone can be part of Jersey's approach to achieving carbon neutrality.*

#### **Commenting on the Roadmap action plan (pages 40 &41)**

##### **On Roadmap planning Delivery: Transport**

- *You must make sure active travel is accessible for the large number of PWD who rely on cars - about 14,000 have a disability in Jersey.*
- *Currently buses can only carry one person who is in a wheel chair - what do you do when there is more than one person on a route who wishes to commute to work who is a chair user?*
- *Are adapted EV vehicles available or at same cost as standard EV?*
- *Many people who do not have a blue badge manage - but could not do the presumptions of activity level as set out in the active travel plans*

##### **On Roadmap planning: Heating**

- *Consider that many people may not be able to have time with no-heating or no electric when things are installed - so would have extra costs of moving out or having to relocate - even if only for a few hours or days - if you have medical equipment and EPU provision this is only a short term - ie power cut backup - not usually enough to facilitate building or installation works such as suggested.*
- *Also some heating changes might not be possible if they reduce useable floor space in narrow areas or could be safety hazards.*
- *Some people with disabilities just due to the nature of things use more water/electric etc - an amount assigned as average use may not reflect their basic needs and should reflect that possible need in any nudge approaches - ie large user of water electric - greater charges above cost to discourage that extra use*

### **On and Off-Island Emissions Delivery plan:**

#### **Public Awareness Campaigns - Climate Conversations:**

*Make it accessible for all - easy reads, plain English, videos with captions and BSL*

#### **Enabling Policies: GoJ fleet carbon neutral**

*“This could be an issue if a decision was made that staff had to actively travel on their commute to work - For example not considering that some staff cannot use active travel and no plan for accessible parking or that not all staff could walk, cycle or take the bus”*

### **What are your steps along the road to net-zero?**

#### **Cycle or take the bus at least once a week**

- *This is disempowering for people who cannot do this*
- *Not everyone can take the bus, not everyone can cycle.*
- *If you have a blanket thing that people with disabilities cannot do it increases the prejudice as we cannot access the same things or take part*
- *Consider that people who are at high risk for covid are still advised not to use public transport - many couldn't walk or cycle a long distance - how do they take part in life*
- *Consider health policy and public health advice*

Buy an electric car

- *If you need an accessible car – do they actually make them?*

### **7. Understanding our sources of emissions:**

#### **7.7 Services might be provided closer to our homes... Continuing to accommodate the majority of new homes close to services within existing urban areas**

*“Remember that much of the build environment is inaccessible to many PWD or it poses significant challenges so that a trip to town is not a quick pop in and out but a difficult thing and problematic”*

**Shifting journeys to less carbon intensive forms of travel:**

**7.11 .... Implementing the Sustainable Transport Policy will take many years and require increased investment to deliver the wide range of benefits it can offer. In adopting the principles set out in the Sustainable Transport Policy framework though, the States Assembly recognised that future Sustainable Transport Policy delivery plans will need to:**

- **make active travel and public transport easier, safer, cheaper, and more convenient to use.**

*The disability inclusion team as “accessible to all?”*

- **reflect the true environmental and social cost of private car journeys through increasing the relative cost of car ownership and usage**

*The Disability Inclusion Team suggest the inclusion of “...but where car or vehicle ownership is needed to maintain disabled islander quality of life that this should not just be borne by the individual”*

*“Without accessibility consideration it becomes a policy of raised prices that disable someone who does not have a proper alternative - rather than 'I'd just prefer not to take the bus'”*

**7.16 - how the journey towards decarbonised travel in Jersey might unfold – scenarios (page 50)**

**Shared transport will become the norm**

Shared transport often does not allow for adaptations for vehicles for people with disabilities so is limiting for some people - ie all hand-controlled car

**Reduce demand for energy**

**7.23 The way in which people use energy also has a large impact on emissions, for example, having the heating thermostat on high rather than putting on additional clothing or not adjusting the timing of the hot water so that you only have it when you need it. As well as improving the energy efficiency of our buildings and appliances we need to learn to be smarter in our use of energy. New technology can help us do this**

*Standard steps might not be suitable for all disabled people*

*- ie temperature control at higher level - suggesting a one size fits all*

*- ie extra jumper might actually for some PWD might not be possible or could lead to unintended consequences of worsening health*

**7.32 Considering Running costs...that the least well off in society are not driven further into fuel poverty by the Island’s decarbonisation plans**

*Include people with disabilities who have higher than average fuel consumption*

## 8. Costs and Benefits (page 56)

**As well as undertaking a Children's Rights' impact assessment** *"do a people with disabilities impact assessment too"*

### User Fees and Charges

*The disability inclusion team wish to highlight in terms of introducing user fees and charges that a "wider conversation about additional costs for people with disabilities currently not offset in Jersey"*

## 9.2 Assessing and prioritising policies (page 63)

### Consultation & impacts.

**When exploring Children's Rights Impact Assessments** *"This also needs to be scoped for policy impact for people with disabilities"*

And

*"The disability inclusion team in GoJ local services can help facilitate additional consultation with people with disabilities"*

## 10: Delivery Plan 2022-25

**Speeding up adoption of electric vehicles** – *"ensure that there is charging points in blue badge spaces"*

**End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030** *"to do this there must be accessible vehicles in production"*

**Sustainable Transport Roadmap- Complete the rapid plans required by the Sustainable Transport Policy and, drawing on these, publish a Sustainable Transport Roadmap in 2022.** *Review this with a disability lens so you are not missing out people who cannot access active travel or in the way GoJ anticipates.*

**Active Travel** – Currently there is a *"Disconnect by presumed ability to walk or cycle and distance for blue badge eligibility - there will be people who are excluded currently who are not eligible for blue badge who couldn't walk that distance"*

*Sustainable Transport Roadmap, bus service development trials and active travel need to be "considered with a disability inclusive policy lens"*

### Update Building bye-laws

*"consider updating bye laws to make adaptations and new builds properly accessible for people with disabilities as bylaw min standard is not accessible for many people, esp. with larger size of wheelchairs, power chairs etc so even new builds (private/public) don't have good access or access is ok once in the building but not getting in"*

### Implementation programme – governance



**Recommendations – when deciding whether policies are delivered internally – “make sure any external agencies consider accessibility”**

**When exploring how the small grants scheme might be effectively implemented – suggestion “simple add on – could be a’ additional costs due to disability’ option.**

**To conclude the disability team can signpost:**

*Local training available - contact disability inclusion team - Train all the Boards to be able to be aware of the impact of these on the lives of people with disabilities and to make high value decisions which do not exclude the 14,000 islanders with disabilities.*

[disability@gov.je](mailto:disability@gov.je)

## Appendix 12.15: Durrell Wildlife Conservation Trust written submission

### Draft CNR Consultation response – Durrell Wildlife Conservation Trust - General Submission

Dear Minister for the Environment,

Durrell Wildlife Conservation Trust ('DWCT') welcomes the publication of the draft Carbon Neutral Roadmap, and would make the following comments:

#### **Transport Policies**

DWCT is concerned that although TR1 is commendable, its effect may be minimal as, in our view, the current lack of price parity between internal combustion engine ('ICE') and electric vehicles ('EV') combined with the relatively low level of subsidy, is likely to result in minimal take up. Such a subsidy is 'preaching to the converted' as those who are already planning on purchasing an EV don't require this windfall – such funds might be better used elsewhere, including further funding on fuel duty for transition fuels, heating or energy supply.

Increased public awareness is needed on the carbon emissions embodied in the production of an ICE vehicle and the additional emissions associated with the production and switch to an EV. DWCT is concerned that the embedded carbon cost differentials are not being articulated to the public when making such a decision. A serviceable ICE/hybrid vehicle that has 'paid back' its embedded carbon costs could operate for an additional period before switching to an EV with its embedded carbon costs. We would welcome clarification in messaging.

Additionally, we are aware of EV purchases made as additions to private car fleets, whilst retaining ICE vehicles, using them for different purposes. DWCT would welcome messaging to encourage the public that if the switch is to be made, then it is truly a switch.

Further, a switch to EV's (and heating), will make for an increased load on Jersey's electricity network and therefore DWCT query whether the current infrastructure will be able to support this change. Has a feasibility study on this been considered?

Moreover, EV require sufficient charging infrastructure, particularly overnight when not in use. The Island needs to increase its charging infrastructure to support this change. It is questionable as to why this subsidy is targeted for domestic purposes only. DWCT are fortunate to have an electric charging station located within our public carpark. However, if we are to significantly switch our fleet to electric, installation of a centralised charging hub within our site services area will require investment. We don't doubt that other commercial businesses will be in similar positions and therefore would hope that this subsidy was available for commercial purposes.

The combined effect of the above constraints are likely to delay this switch. From an agricultural/large-scale commercial vehicles perspective, there are currently no electric tractors or vehicles within an affordable price range available. DWCT want to contribute to Jersey's response to the Climate Emergency, however, acknowledge the barriers currently in place. DWCT does not want to be disadvantaged by this and therefore welcomes TR3 ('Supporting transition fuels').

The main issue with TR3 is that some manufactures do not support the use of second-generation renewable diesel ('SGRD'), which can breach warranty and therefore will hinder uptake on a commercial scale. We would encourage GoJ to play a role in supporting relations with car manufacturers in the adoption of SGRD for Island-wide uptake.

The affordability of TR3 varies from a domestic to commercial scale and will be more onerous for the latter depending on fleet size. There's a risk of SGRD prices increasing significantly due to increased supply and demand. There needs to be a commercial affordability to SGRD and greater guarantee of maintained prices to ensure long-term adoption.

Red diesel does not require fuel duty to be paid currently. As TR1 is phased out, is there potential for GoJ to implement an additional policy to incentivise commercial businesses that currently use red diesel to fully switch to SGRD with further subsidisation?

### **Heating Policies**

HT1 ('Supporting low-carbon heating systems and home insulation') is a highly aspirational policy, assuming c16,000 switches by 2030. Despite the subsidy, this aim may be too ambitious given budgetary implications. Additionally, users have a choice and may not choose to switch with current costs, which will impact achieving the CNR's aspirations. Furthermore, those in the rental market are reliant on landlords choosing low-carbon systems. Would the government consider assistance to landlords making the switch and updating their housing portfolios to green energy supplies? This might be particularly pertinent for those more opportunistic landlords, who rent only one property.

This policy subsidy does not account for the realistic cost of switching, such as additional infrastructural installation costs. Greater collaboration is needed between GoJ and businesses that provide these services to offer realistic quotes and appropriate subsidies. This further highlights the need to develop on-Island skills (EN3), increasing numbers of suitably qualified local tradesmen.

Again, the switch to electric heating will increase the demand on the current electricity network. DWCT asks the following questions:

- What plans does GoJ have to examine the feasibility of adopting on-Island commercial scale renewables?
- What work with JEC is being done to support domestic and commercial microgeneration?
- In response to HT2, why not update building by-laws before 2026, particularly considering proposed developments in the Bridging Island Plan? All developments going forward should be built using low-carbon heating systems and home insulation prior to proposed changes in 2026.

### **Other Emissions Policies**

GoJ should assist businesses understanding on how to review their supply chains and procurement processes by developing a sustainable procurement tool guide, as well as for Islanders to understand their scope 3 emissions (OE1). This can be applied to all sectors, including construction (OE2) and agriculture (OE3).

The CNR outlined that greater material efficiency in construction could save 80% of its associated emissions (OE2). However, why not go further and offset the remaining 20% of those emissions?

DWCT supports GoJ's work to explore opportunities for carbon capture from the existing electricity from waste plant (OE4).

DWCT has produced an internal waste management plan, outlining targets to reduce and process waste generated on site. Our plan works on the waste management hierarchy, recognising the need to reduce, reuse and recycle prior to energy recovery, which we aim to continually improve on.

DWCT welcomes the development of a net-zero waste strategy by 2025. However, waste is an Island-wide issue now and DWCT hopes that any improvements to waste management that are identified through the development of the new strategy are implemented prior to its publication.

### **Enabling Policies**

Education is at the heart of DWCT conservation work. To tackle the increasing challenges of the biodiversity crisis, which is exacerbated by climate change, we must pass on the skills to conservationists and the public. DWCT supports the GoJ in delivering the COP26 education pledge (EN4). We hope that our vital conservation work at DWCT supports this and provides a collaborative opportunity to increase awareness of the links and impacts between climate change and the biodiversity crisis.

The pandemic has taught us that climate change is increasing the threat of biodiversity crisis and the increased frequency of virus spread between species as habitats are fragmented and individual animals under immunological stress coming into contact with humans. Action should be taken for policies that support the removal of carbon from the atmosphere (EN5 and EN6). GoJ should be leading by example (EN1) and making the necessary carbon reductions and carbon offsets. Carbon offsets do not mean that carbon reductions can be compromised, however, why delay the increased draw down of carbon from the atmosphere, alongside additional benefits of biodiversity and air quality enhancement?

If the issue is monetary, with offsets predicted to increase in price to \$150 tCO<sub>2</sub> by the end of the decade, Jersey should be investing in offsets as soon as possible to minimise initial cost and encourage early growth and establishment of (rain)forests. If the policies outlined within the draft CNR are successful in reducing Jersey's carbon emissions, costs associated with carbon offsets should only reduce over time.

It is worrying that GoJ have not made an official policy on carbon offsets. DWCT is concerned that the decision to review and produce a carbon offset framework in 2025, along with the decision on becoming carbon neutral to be taken by 2028 is too late. This demonstrates lack of urgency and resources to deliver such a review amongst the many other priorities outlined in the CNR. The next term of Government must ensure appropriate funding and resourcing for the specific teams within GoJ to deliver on this as soon as possible. This further supports EN3 – the need to develop on-Island skills for a sustainable economy - a necessary investment for the current and next generation.

Durrell's ReWild Carbon programme provides a credible, science driven approach to carbon offsetting, which is creating wild, species-rich ecosystems that sequester 40% more carbon than monocultures, while protecting endangered species. We have been sequestering carbon for 60 years and have a long track record of working in our chosen countries. We hope that the CNR provides an opportunity for DWCT to work collaboratively with GoJ, to support your intentions for carbon offsetting through the ReWild Carbon programme as soon as possible, in order to continue Jersey's response to the Climate Emergency.

**WORD COUNT: 1,498**

Thank you for your consideration.

Kind Regards,

**Durrell Wildlife Conservation Trust**

Les Augres Manor, La Profonde Rue, Trinity, Jersey, JE3 5BP, Channel Islands

For further correspondence, please contact: 

## Appendix 12.16: Energy Forum written submission

Deputy John Young – Minister for the Environment.

General Submission 28/01/2022.

DRAFT CARBON NEUTRAL ROADMAP.

Submission on behalf of The Energy Forum.

Dear Minister,

On behalf of the Energy Forum please find detailed below our considered General submission in respect of our overall thoughts related to the Draft Carbon Neutral Roadmap. As you would expect with our diverse membership having substantial ideas, thoughts, concerns and opinions on risks, opportunities and impacts, most if not all of the Forum membership, are likely to be lodging their own submissions from their organisational or personal standpoint in respect of the Roadmap, but the Forum felt strongly that we could all agree on some important high level general observations which might be useful to the Minister in his deliberations on the issue in the build up to the lodging of the final Roadmap for consideration by the Assembly.

In general terms the Forum have been given substantial opportunity in the build-up to the development of the draft Roadmap to engage with both officers and indirectly with politicians in the process and make our diverse views known both on a consolidated Forum level basis but also on a one-to-one basis as felt appropriate. We have been at each stage given full opportunity to understand the processes, to be informed as much of the thought contained in the Roadmap was evolving and to be aware as far as possible of the data and forward projections informing policy development in respect of the subject as it moved to its current state.

With the Assembly having taken a decision on a target date for Carbon Neutrality (circa 2030) and with what we regard as a significant but successful exercise in democracy through the Citizen's Assembly as a backdrop we are generally supportive of where we now are, and the clear direction of travel set out in the Draft Roadmap. Of course, the devil is in the detail but with promises of on-going dialogue particularly through the proposed and important Energy Market Review to be conducted over the next 12 months or so which will develop transition plans in conjunction with the major energy market actors and through the creation of Carbon Neutral Alliance (more on this later) we are confident of continued involvement and engagement in the process. The Forum also recognises that in short term, fast pace and bold leadership in respect of the on-island carbon abatement is the clear priority with the option remaining open for the island to choose to buy offsets, despite the issues and complexity surrounding these, in order to be carbon neutral by whatever final date is agreed. Carbon Neutral by 2030 is therefore something that can be considered over the next few years once we have established the initial trajectory of on-island progress which is key.

The Forum recognises that Jersey as an island has much to do to move towards both the aspirational target on Carbon Neutrality and indeed to honour our new international commitments embedded in the signing of the Paris Agreement and a fast start to the process is now paramount. We do feel that the island has slipped behind many other jurisdictions in terms of its current position having long-since secured the benefits of sourcing extremely low carbon electricity so a plan of action to catch-up and move rapidly towards the set objectives is essential. Indeed, it is clear that many other countries and jurisdictions have had in place at least some of the measures proposed in the Roadmap for several years already and have made substantive progress thus giving Jersey the opportunity to learn from these interventions. Basically, the direction of travel is supported, the

need for pace is obvious, however we do need to be kept involved fully in the processes to achieve what is desired. Care is also necessary to ensure that the delivery capability and capacity is in place particularly relating to the skills needed by the technology in order to secure maximum benefits. Let's secure the benefits of the low hanging fruit but let's ensure the detailed processes are in place and appropriate to secure many of the other potential rapid gains.

There is already much appetite for great informed discussion and indeed bold action as demonstrated particularly by the Island's Financial Services industry and by some others at this time but this needs to be widened to all sectors. Pace of movement is everything and the next 10 years are indeed critical if we are to put the island on the right path to net zero, but we do need to build out the skills base and take cognisance of current and emerging technologies so the right decisions on policy are made. These may indeed need to be refined as we go forward and so from a political perspective, Government may wish to frame these up front as a portfolio of measures, with some likely to be more successful than others. It is essential that expertise at all levels is rapidly developed both across industrial sectors but also within the regulatory framework and it must be recognised that extensive lead-times come into play with some initiatives. Add to this a total need for the right balance between charges and incentives (sticks and carrots) and the complexity of action begins to become clear. So, speed of transition is indeed critical but there are well researched and evidence-based solutions already out there. What is needed is care to ensure that these solutions are timed for introduction to optimise the opportunities developing technologies offer thus we must not always jump too soon. Careful consideration does indeed need to be given to the timescales required for the implementation of projects and policy changes to ensure that design is appropriate, distributional impacts are understood and there are no, or few unintended consequences buried in policy interventions. These are particularly relevant when the supported concept of a "Just Transition" is considered, which is agreed by all as fundamental to all plans and changes forward.

We recognise that there are significant costs involved in moving to what is desired but in a jurisdiction which prides itself on its financial acumen there are innovative mechanisms to circumvent this. Perhaps we should talk in terms of investment in our future rather than simple costs or expenditure at any point in time. Many of the interventions are viable when assessed over the life of the abatement measure and we also need to clearly reference costs associated with doing nothing or too little both in monetary sense but also in terms of the loss to the island's broader reputation as a progressive jurisdiction and a place to do business.

Returning to the issue of the proposed Carbon Neutral Alliance as indicated above. The Forum acknowledges that its place in on-going discussion and the evolution of policy will inevitably need to be carefully considered but in general terms it is supportive of a broader body of business and community organisations that brings opinion, expertise and best practice to the table. This body it is understood is still to be fully specified and a decision on whether it becomes at least in part the distributor of incentives and monies of various sorts is yet undecided. We do however believe there will be a significant role for current Forum members to play particularly those with direct interest in the Energy Market.

In summary therefore the Minister is advised that the totality of the Energy Forum, allowing for differing views on policy details, expresses overall support for the Roadmap and the general direction of travel with a focus on early pace, drawing off learnings from elsewhere. We recognise and accept the amount of work put into the project and the strong evidence base that has been developed behind it and are aware of the intention to on-going involve the members of the Forum as appropriate in the development of the final strategy.

For and on behalf of the Energy Forum

( 1200 words approx.)

## Appendix 12.17: Equilibrium Futures (Jersey) Limited written submission



Deputy John Young  
Minister for the Environment  
Broadstreet  
St Helier JE2 3RR

31<sup>st</sup> January 2022

Dear Minister,

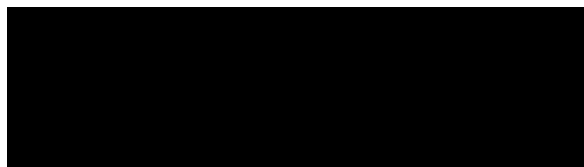
### **Comments on Draft Carbon Neutral Roadmap from Equilibrium Futures (Jersey) Ltd**

#### **Reference: Finance sector and funding the transition**

I am sending in these comments on the draft Carbon Neutral Roadmap (CNR) in my capacity as the [REDACTED] Equilibrium Futures (EF), a Jersey based consultancy providing advisory services on environmental risks and opportunities to the finance sector on the Island, and also globally. EF provided background research for the Sustainable Finance Strategy “Jersey for Good” and it’s related “Pathway” now being implemented by Jersey Finance Limited. EF is also playing a leading role in the emergence of the global Taskforce on Nature-related Financial Disclosure (TNFD) supported by the UK Government.

#### **General response**

EF welcomes the CNR and congratulates all who have contributed to its development. This marks a major opportunity for the Island to transition to carbon neutrality and, if implemented in an effective way, to change the conversation about perceptions of Jersey from tax haven to “green haven”. As a rich jurisdiction, it is an opportunity for Jersey to be a leader, not a laggard, in reacting to a self-declared climate emergency. Putting Jersey ‘out in front’ on these issues will attract welcome attention and business to the Island, by those impressed by GOJ’s commitment to a just climate transition and more sustainable lifestyles.





## Financing the Funding Gap

The CNR indicates a commitment £23m against an estimated budget of £250m. There is little detail on how this could be bridged. In Finance Sector terms this is not a large sum. EF recommends that GoJ establishes an active engagement process with the local financial sector to seek innovative ways and means by which Jersey's private sector finance organisations and family offices could assist in funding the transition required by 2030.

Such innovations might include the following:

- **A £100 - 200m "green bond"** – the use of proceeds from which would be targeted towards actions to meet the transition towards carbon neutrality.
- **Green impact investment funds** to undertake specific small business development related to carbon neutrality or sustainable activities such as sustainable agriculture or active transport options. Revenue streams to pay back investors would need to be identified. Seeding of funds with first loss or other guarantees, from GoJ may help attract development funds, philanthropy and private investors in layered and blended impact investment vehicles that are now becoming commonplace in such sectors.
- **Carbon Offset Bond** – This was first proposed to GoJ in 2019 by Mirova Natural Capital and offered a public private partnership to fund Jersey's offset requirements ahead of the 2030 goal. To date there has been no response from GoJ.
- **Green Mortgages** – offered by the banking sector to help cover bundled transition costs such as insulation, replacing fossil fuel boilers with air-source heat pumps or other interventions that would reduce emissions from heating.

## Decarbonising Jersey's public finances.

### Island Reserves and Pensions

Considerable reserves are held by the GoJ on behalf of the people of Jersey. Pensions held by the States are also managed on behalf of the people of Jersey. The investment policy should be in sync with the Carbon Neutral goal adopted by the States. EF therefore recommends that a review of the carbon intensity of these portfolios is undertaken and GoJ works with its asset managers to reduce the carbon intensity of the portfolio over time by switching to assets that are not associated with high emissions.

The Church of England's entire portfolio is currently undertaking this transition, as are the portfolios of a growing number of Councils and Universities in the UK and worldwide.

### Reporting and Disclosure

The CNR seems a little light on data, metrics, and standards by which the transition will be measured. It might help to speed the transition if internationally adopted frameworks are also applied to the Island. The Taskforce on Climate-related Financial Disclosure (TCFD) is mandated for use across the UK in 2025. In France it is already mandatory. GoJ should consider taking the same step. It should also be aware of TCFD's cousin, the Taskforce on



Nature-related Financial Disclosure (TNFD) due for release in 2023, as this too will cover emissions, but primarily from landscapes and agriculture.

### **Financial incentives for Transition**

**Transport** - The target of 2,500 grants for electric cars will impact just 2% of the islands registered vehicles. Whilst an excellent signal, it will not do enough to transform the transport sector and meet the CNR goal. Ways should be found to increase the number of grants or to add additional incentives. Could this be increased to 10% or more?

**Heating** – The precise application of financial incentives was not clear. A good alternative to fossil fuel boilers, are air-sourced heat pumps and a financial incentive to fit these, and other proven emissions saving technologies, would boost the local building trade and help islanders to install them, alongside increased incentives for insulation.

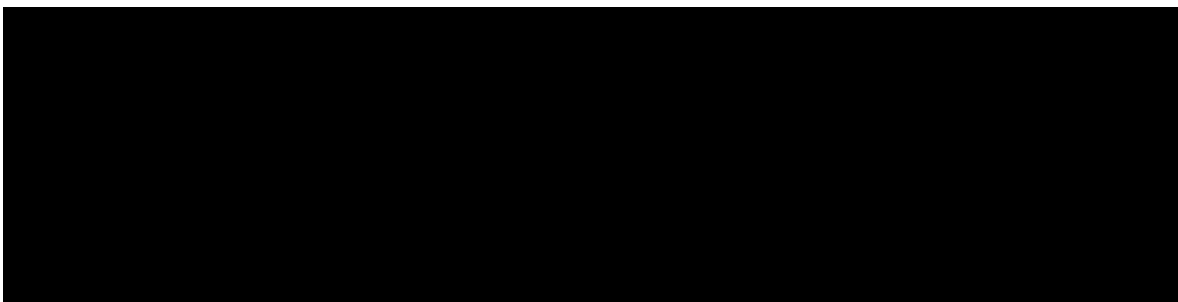
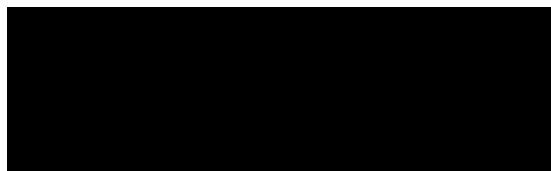
**Fuel** – the reduction in tax for RD100 fuel should be brought in 2022 and not 2023. This could apply to both transport and heating fuel, if possible.

### **Just Transition**

Implementation of the draft CNR could have unintended consequences on the poor or disadvantaged families on the island. Blanket hikes in fossil fuel taxes can result in unfair hardship to such families. Every effort should be made to mitigate impacts to ensure that a just transition is achieved. It is vital that a strong positive communications and awareness programme is achieved to bring the all Island's population along with the strategy.

Equilibrium Futures Ltd stands ready to support GoJ in any way it can to help accelerate the achievement of the CNR.

Yours sincerely,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the company name.

Jersey Registered Company No. 129505

## Appendix 12.18: Highlands College written submissions

# The Carbon Neutral Roadmap (Transport & Heating)

## Transport

The report details the fact that transport sector is the largest source of on-Island greenhouse gas emissions in Jersey, producing 44% of emissions at a time when vehicle ownership levels are increasing and there are more cars on the Island than people.

The UK government has announced that new EV charging requirements will come into force in England in 2022, as part of an overhaul of the country's Building Regulations. From next year (2022):

- Every new home, including those created from a change of use, with associated parking must have an EV chargepoint.
- Residential buildings undergoing a major renovation which will have more than 10 parking spaces must have at least one EV chargepoint per dwelling with associated parking, along with cable routes in all spaces without chargepoints.
- All new non-residential buildings with more than 10 parking spaces must have a minimum of one chargepoint and cable routes for one in five (20%) of the total number of spaces.
- All non-residential buildings undergoing a major renovation that will have more than 10 parking spaces must have a minimum of one chargepoint, along with cable routes for one in five spaces.

These requirements are in addition to public space charging stations that would be made available in supermarkets, visitor attractions and roadside positions. If Jersey follows this model, this means a substantial investment in infrastructure would be required to ensure compliance with regulations, and an increase in the number of **qualified operatives** to install and maintain the equipment.

In terms of the vehicles themselves, due to the changes in legislation, Internal Combustion Engines (ICE) will be banned from sale in 2030 and manufacturers are gearing up to go full electric before then. Currently there are around 80 different models of electric vehicle for sale within the UK market with many more due to be released over the next few years. These vehicles use batteries with operating voltages of between 200-800V instead of the standard 12V that is used with ICEs, a voltage that is 60 times greater. Due to this, special precautions and training are needed to work on the vehicles.

From Highlands College's perspective, investing in the automotive training workshops is essential to allow the college to provide suitable resources and facilities which will enable full-time students to offer potential employers a more useful skillset, to work safely, and to help future-proof their career. For our apprentices, this will modernise and update their training to offer better value to both the apprentice and the employer. For existing qualified technicians, this will aid them to upskill and continue working past 2030, increasing their earning potential as well as allowing them to operate in a safe, efficient manner on electric vehicles.

Operatives working on electric vehicles will sometime be required to work on live electric/hybrid vehicle high voltage systems and components. Suitable qualifications and training are essential to ensure the health and safety of individuals working on the vehicles, along with the wider public. On

island specialists will be required to service and maintain the batteries of vehicles to avoid the costly expense of sending them to the UK for repair.

Thought should also be given to operatives who feel that the difference in skills required to make the transition is too great. It's a major step in terms of technology and many may decide to change careers as a result. Guidance and support will be required.

## Heating

The report highlights the need to stop using oil, gas or coal for heating homes. There are currently around 20,000 oil boilers in domestic properties on island.

Like the automotive industry, the industries that are linked to heating homes and businesses will face a major challenge in preparing their workforces for change. This will inevitably mean huge amounts of upskilling along with the creation of some new roles in the industry

Emerging technologies in the sector will bring new skills demands, for example, in the specification, design, and installation of digitally operated heating systems that ensure optimal efficiency. These skills will be required both of engineers and tradespeople, but also supporting personnel.

The installation of smart meters in homes provides a recent example of this change whereby domestic technicians have needed to adapt to an increasingly digital role. There will also be new roles and jobs created not within the typical technical trades, for example retrofit specifiers and project managers.

As standard, domestic heating systems will work intelligently and learn how to make the most of the energy resources available in the property and respond accordingly. They will be responsive to external conditions and automatically control the temperature internally to maintain the required comfort conditions.

Whilst these systems have been evolving over the last few years, it has often been only the high specification installations that have benefitted. A wholesale roll out will mean an equivalent requirement with skills training.

The installation of heating systems that use the digital technology will also require a different approach in terms of skills training. Installers are used to using a single heat source (eg. a boiler) when installing heating systems and the future model may require a combination of energy sources that work in collaboration. This will require skilled design engineers to specify, on many occasions, bespoke systems to maintain efficiency.

There would potentially be the demand for new apprenticeship programmes that can be designed to meet the demand for these design technician roles, as well as looking at existing apprenticeships to ensure the practical competencies are reviewed in line with the installation skills required in the sector to install and maintain the working systems. It is worth noting that training a new operative up to technician level can take up to four years.

At the same time, the existing workforce will need an element of upskilling. It will be the case that some will need time to retrain, but there will be many that already have the transferable skills that are needed, and the skills gap closed by shorter, targeted training and topping up, rather than wholesale qualifications.

There are many low carbon producing alternatives for householders to consider, such as using electric heating, heat pumps, photovoltaic systems, solar thermal or even district heat networks, where a central source is used to heat water, which is then shared among nearby houses through networks of pipes. In many cases, it is not just a matter of changing the heat source, for example, from an oil boiler to a heat pump. The existing heating systems will also need to be updated to run at what would become a lower temperature heat source as was previously the case when condensing boilers were introduced. With heat pumps there is also the added need to safely handle the refrigerant gas contained within.

Clearly, in terms of the (re)design, (re)installation and maintenance of new and existing heating systems, there will be many challenges that will need to be addressed to ensure the island achieves its ambitious targets. Training facilities and programmes will need to fully reflect the emerging technologies that will be at the heart of the changes as well as future proofing. New entrants to the industry will be required that learn these skills during their apprenticeships and existing operatives will need a skills analysis, leading to a comprehensive upskilling package that fully prepares them for the future of the industry. The quality of the training will be crucial as many of the system component installations are covered by a 'license to Practice' scheme, meaning installers must be legally qualified to carry out the installations.

The carbon footprint of heating, however, isn't the full picture. To cut down on emissions, alongside low carbon heating systems, houses do need to retain heat. This means we need to be able to trap what heat we put into our homes inside rather than allowing it to escape.

The enforcement of building regulations will ensure that new buildings will be energy efficient in terms of the heating systems and the insulation and heat retaining qualities. Existing buildings will require detailed surveys to ensure the appropriate recommendations can be made in terms of energy efficient adaptations. If energy audits are introduced (linked to house sales) there will be the need for a number of suitably qualified personnel to carry out the surveys. This number could include existing operatives with transferable skills or new entrants to the industry. Once again, an element of training would be required.

Word Count: 1408

Assistant Principal  
Highlands College

# The Carbon Neutral Roadmap (General)

The urgent global need to reduce carbon emissions and increase biodiversity will be two of the biggest drivers of economic, political and social change for many years to come.

To reach net zero emissions by 2050, annual clean energy investment worldwide will need to more than triple by 2030 to around \$4 trillion. This will create millions of new jobs, significantly lift global economic growth, and achieve universal access to electricity and cleaner living worldwide by the end of the decade.

Everyone has a role to play in delivering on net zero targets. Highlands College is uniquely placed at the heart of the community to support a clear transition to a sustainable economy for people and employers. The college must be invested in and empowered to play their role in the journey to net zero and meet the need for sustainable skills jobs.

Climate change is affecting the world that we live in and GoJ are looking towards a people powered approach to reaching net zero by 2050. The carbon neutral roadmap highlights that Transport 44% and Heating/Energy 36% of scope 1 emissions are the largest source of on-Island greenhouse gas emissions.

## Political

Jersey, through the roadmap, now has a net zero timeframe. However, GoJ must ensure the resources and appetite through policy clearly define the resources which are aligned to the financial viability through treasury, a realistic infrastructure (capital expenditure) and technical development and training to make this happen (2024 long term financial plan dynamic or realistic in time to support the ambition?). This will also depend on the progression and investment in a resourced and skilled workforce enabling the implementation and maintenance of any future technologies and infrastructure.

Clear regulation and leadership – driving sustainability and thinking around net zero working with Industry, incentivising companies to go carbon neutral which will need to comprise of energy efficiency investments, signing power purchase agreements for their energy needs, implementing an internal price on carbon, or investing in offsets for emissions that cannot be immediately or directly reduced. Expanding the tools available to meet reduction targets, particularly by “pricing” any remaining emissions through real, measurable, verifiable, and additive offsets, allows for a gradual reduction of emissions.

## Industry

All organisations must engage and become advocates to play a role within the community. Organisational strategies must set challenging goals to meet net zero however, this must not become a league table, it needs to be a collaborative approach across all sectors to reduce carbon emissions. Employers need to look at skills and demands for the future, otherwise the lag when required will impact on the availability of training and technology that’s required to meet the green skills demand.

## Infrastructure

Capital expenditure and private investment is a vital enabler to meet the ambitious GoJ carbon emissions. Speed of need – not delayed with long lead times and bureaucratic paperwork to hinder development opportunities.

Development of learning environments and technically advanced infrastructure to sustainably transform college estates and enable colleges to invest in the innovative technology required to train for future needs. The economic benefits of a new college facilities are estimated at a return of £13 per every £1 spent just in workforce training and upskilling benefits to businesses and local industry.

Alternate opportunities to retrofit and develop current infrastructure – drive towards 2030 across all education estates (living learning spaces), rather than 2050 as this will not support the speed and ambition of the GoJ net zero roadmap.

Infrastructure for so many reasons need to be high priority for Treasury, the development of EV charging points and supporting infrastructure/network, alternate heating sources and efficiency within buildings will become the largest investment in GoJ history. The opportunity to invest in education is exciting however, this needs to be the foundation in development, not the last piece of the jigsaw puzzle, otherwise the skills and competency to meet net zero will become an unattainable goal.

## **People and Training**

Highlands College will continue to encourage students and communities to make informed decisions and take action to change society and care for the planet. Incorporating sustainable development into core curriculums will help students to understand its importance and how sustainability is connected to almost everything (new curriculum design in progress, which embeds global citizenship and sustainability as core competencies within the offering). Climate change places a new lens through which to study everything, from the disposal of materials and chemicals used in hair and beauty, to the source of food used in hospitality and culinary arts, and the representation of nature in the English literature.

Investment is required to training lecturers and teaching staff in climate responsibility and sustainability, which will enable them to incorporate education for sustainable development in the curriculum. Through education we can nurture, compassionate, confident, and curious young people who then have the knowledge to question status quo and transform our world. Young people are passionate about the planet and have voiced this during COP26 and within the Youth Parliament.

The challenge is that Highlands College can only train and educate people in the new skills needed – air source heat pumps, electric vehicles, off-shore wind, green logistics and so on – if people want to learn them. People will only demand these skills when employers require them. The risk is that when the demand comes from employers, it will take too much time to train the people needed for the jobs.

## **Summary**

The Jersey Roadmap to net zero strategy has now been published by GoJ, rightly recognising the important role that Highlands College has in reaching ambitious targets. To enable this to succeed the college need to see the investment in infrastructure, training, and resources with the political support to educate and train the skills that will be in demand in the near and planned future.

We are on the brink of an exciting shift to a more sustainable future, which embeds Highlands College and the skills agenda at the heart of the community.

Word Count: 987

– Deputy Principal –

Highlands College



## Appendix 12.19: Jersey Business written submissions

31 The Parade, St Helier, JE2 3QQ  
Telephone: +44 (0)1534 610 300  
Email: [info@jerseybusiness.je](mailto:info@jerseybusiness.je)  
[www.jerseybusiness.je](http://www.jerseybusiness.je)



Minister for the Environment  
Maritime House  
La Route de Port Elizabeth  
St Helier  
Jersey  
JE2 3NW

31<sup>st</sup> January 2022

Dear Minister for the Environment

Please find our submission below in response to the consultation on the draft Carbon Neutral Roadmap. Our submission has been developed after consultation with retail, hospitality and tourism businesses and is focused on the potential impact of the roadmap on these industries.

### **Emissions Policies**

#### OE1 Promoting low-carbon lifestyles

Industry leaders indicated a keenness to be included in programs to promote Islanders' awareness of the supply chain and scope three emissions. Business leaders across industry want to play their part in promoting local, seasonal, and sustainable choices to islanders. In parallel, increasing customer demand will drive a move to products with a low carbon footprint and retail and hospitality businesses are experts at offering products and services that meet customer expectations.

However, in promoting local produce, price and availability is a factor for the industry. The perception is that the island cannot provide enough to sustain itself, nor with the food biodiversity that industry requires to produce the dishes they wish to offer.

- The new rural economy strategy should consider the promotion of local food biodiversity, encouraging local produces to grow for the local market and not just focus on exports. It is recognized that, from the producers' point of view, this must be matched by increased spending locally by the consumers.
- Education and support programmes should be focused on all levels of the ecosystem, ensuring that relevant conversations occur with commercial businesses as well as individuals. This should include the importance of buying local produce, to encourage purchasing locally and reduce imports accordingly.

Suppliers to the hospitality and tourism industry are also agents for change. For example, working with wholesale suppliers to voluntarily reduce or completely stop the sale of polystyrene packaging also presents an opportunity to educate people and change behaviour in business and consumers.

Conversely when regulation is used it must be fair and consistent. Whilst the Single Use Plastics etc (Restrictions) (Jersey) Law 2021 comes into effect in July 2022, banning single use plastic & paper bags, there remain many other single use items on the market with a heavy carbon footprint, not conducive to attaining a strong net zero position. These other single use items, such as plastic straws, single use cups for hot drinks and polystyrene take-away boxes, continue to be popular and are used even when not necessary.

There are good examples on island of businesses voluntarily using more sustainable packaging for take away food instead of polystyrene. This does, carry a significantly higher cost at present, however, if more businesses moved to these alternatives, the buying power would help reduce the cost.

- Consideration should be given to extending the existing legislation to encompass a greater variety of single use items in the drive for low carbon lifestyles.

#### OE4 Emissions from waste and water management

Jersey Business recognizes the need for net zero waste and water management strategies, and notes that the Government will consider the introduction of commercial waste charges for some activities.

Concerns have been raised in relation to how a waste water management strategy will regulate different types of waste water. Many businesses, particularly by venues with pool facilities, deal with a large volume of water waste, varying from grey water (sinks, washing machines, bathtubs and showers) to black water (kitchens, dishwashes, toilets etc). Policy in this area must provide the infrastructure and support to enable business to make the necessary changes without unfairly penalizing them.

- Consideration should be given in the waste strategy to recognise domestic and commercial properties who re-utilise their grey water. There should be a mechanism by which those who utilise their grey-water are not charged for water treatment at the same level as water supply.
- Consideration should be given to how commercial pools are affected by the water management strategy to ensure they remain operational

#### OE5 F-Gas emissions

Businesses in food retail reported that early investigation into more sustainable refrigeration systems are available within their budgets, but a lack of on island servicing skills made the purchase unviable.

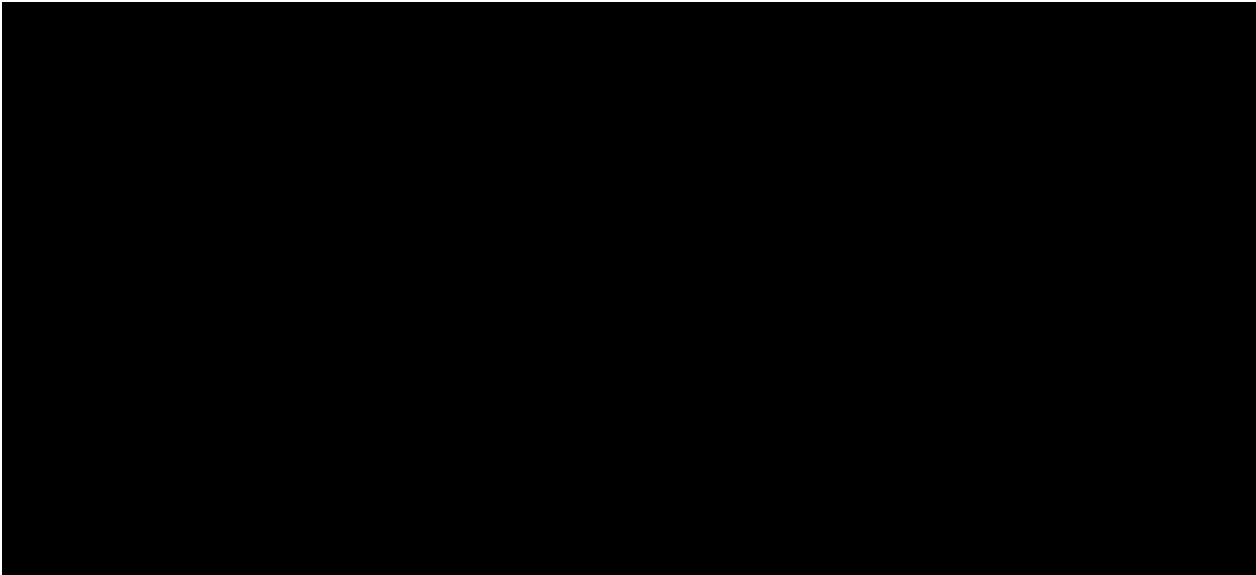
- Consider extending the 'Dependencies' for this policy to include the availability of suitably qualified local tradesmen to install these sustainable systems and service them, with reference to the policy on Green Skills (EN3).

### General comments

Whilst it is recognized that there needs to be clearly established timeline for the adoption of these new practices, concerns have been raised that the timeline must allow for changes to take place in a way that is not commercially detrimental or prohibitive.

In addition, technology will change, becoming more reliable and cost-effective and the timeframe for change must allow for this without unfairly penalizing early adopters or those who cannot progress at the same rate. We must try to manage the cost of making these changes, keeping them at a reasonable level so as not to have a detrimental impact on the islands retail and tourism industries.

- Consider the impact to the economy of losing parts of the retail and tourism industry who cannot effect changes in the required timeframe



Minister for the Environment  
Maritime House  
La Route de Port Elizabeth  
St Helier  
Jersey  
JE2 3NW

31<sup>st</sup> January 2022

Dear Minister for the Environment

Please find our submission below in response to the consultation on the draft Carbon Neutral Roadmap. Our submission has been developed after consultation with retail, hospitality and tourism businesses and is focused on the potential impact of the roadmap on these industries.

## **Enabling Policies**

### EN3 Developing supply chains and on-Island skills for a sustainable economy

Jersey Business welcomes the intention to put the development of on-island skills at the heart of the future economy and skills strategy.

Concerns about a lack of skills routinely came up in discussions around many aspects of the carbon roadmap but particularly in how to measure current emissions and how to utilize technology to record and calculate change. Specific concerns were also raised about having enough specialist engineers to service the new low-carbon products being installed and the availability of electricians as demand rises.

Jersey Business welcomes the intention to carry out a local market supply chain audit including gap analysis to identify supply chain issues which may limit implementation of the policies. This should also be used as an opportunity to identify opportunities for new innovative products and services that could be offered by new or existing businesses.

The responsibility is being put on businesses to understand and work with their own supply chains to reduce carbon emissions. Many will have access to the resources, knowledge and skills to do this, however this could be difficult and onerous for smaller businesses that do not have the same leverage or where there is limited competition in the local supply chain.

The consumer has a role to play and a broader use and promotion of the benefits of locally produced goods and services would be impactful. However, local produce can be more

expensive than imported items and there are several factors to consider when it comes to reducing costs for local produce. The perception is that the island cannot provide enough to sustain itself, nor with the food biodiversity that industry requires to produce the dishes they wish to offer.

- The rural economy strategy should give consideration to the promotion of local food biodiversity, encouraging local producers to grow for the local market and not just focus on exports. It is recognized that, from the producers' point of view, this must be matched by increased spending locally by the consumers.

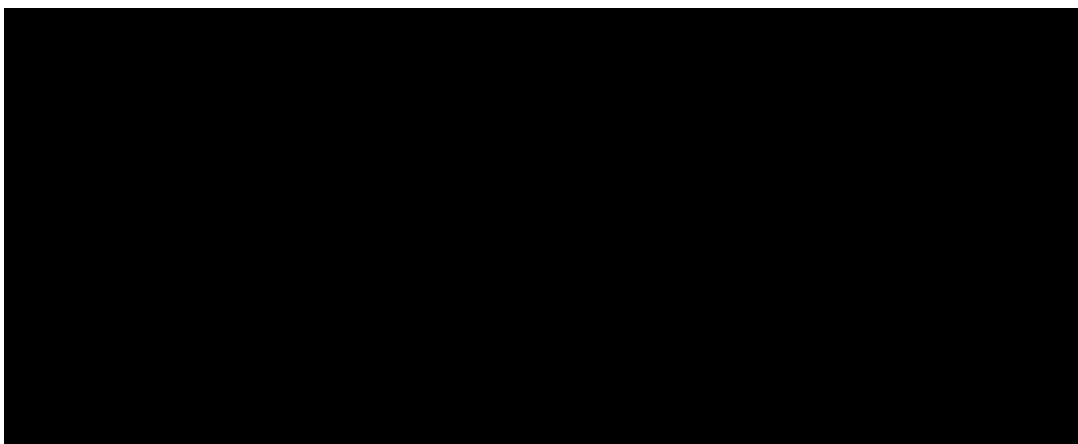
Concerns were raised about Greenwashing, and the promotion of goods and services considered to be 'green' but which, on closer inspection, are not as sustainable as expected.

- Consideration should be given to assist local businesses to verify the credentials of businesses within the supply chain, potentially through certification programmes such as Eco Active, or other accreditations (ISO 14001, B Corp, Global Sustainable Tourism Council etc)

Implementing strategies to reach net zero is a new and complicated challenge for businesses, especially for the significant number that are very small with limited resources. Proactive training, support (including grant support) and implementation of emerging technology will be essential to enable businesses to understand and measure their current carbon footprint and the impact of their mitigating actions.

- Jersey Business should be resourced to provide specialist environmental sustainability support to the local business community to help them understand their carbon footprint and to take actions to reduce it.

Yours Sincerely,



Minister for the Environment  
Maritime House  
La Route de Port Elizabeth  
St Helier  
Jersey  
JE2 3NW

31<sup>st</sup> January 2022

Dear Minister for the Environment

Please find our submission below in response to the consultation on the draft Carbon Neutral Roadmap. Our submission has been developed after consultation with retail, hospitality and tourism businesses and is focused on the potential impact of the roadmap on these industries.

### **Heating Policies**

#### HTI Supporting low carbon heating systems and home insulation

Jersey Business recognizes that a subsidy for heating installation is included for commercial properties in the roadmap and this is welcome.

Retail and hospitality businesses are open for long hours, including weekends, have numerous heat loss points such as open doors or delivery areas and are often in older building that are not energy efficient. If those businesses can be encouraged to swap to electric heating, the emission reduction that could be achieved would be considerable, especially in comparison to a home that is normally vacated during the day.

However, the level of subsidy envisaged, which is the same for a domestic property as for a commercial premises, does not recognize the significant investment needed to make the switch from fossil fuels especially in larger premises. As a result, it would not provide an incentive to accelerate a change in commercial heating systems.

For example, one visitor accommodation business has recently changed its boilers at a cost of £2.4 million which includes not just the cost of the boiler, but also of upgrading the electricity infrastructure and other adjustments in the building. The subsidy envisaged would cover only 0.4% of the costs which makes no significant difference to the financial outlay of the project and therefore to the decision of the business to undertake it.

This is particularly relevant at a time when businesses are still recovering from the impact of Covid-19 restrictions and need time to recover their financial reserves. Many do not have the financial capacity to invest in largescale property upgrades especially if they can see little

impact on their energy usage or costs. As a result, commercial businesses will need a level of assistance that will enable them to accelerate the move to clean energy.

- Increase the level of subsidy for commercial premises to a level that recognises the full cost of the project

Concerns have been raised as to whether there is a sufficiently robust electricity infrastructure, across the entire network, and specifically into commercial buildings, to meet and deliver the increased demand for electricity.

- Consider a phased, island-wide electricity infrastructure upgrade along the same lines as fibre installation, without cost to the end user.
- Consider how to encourage the installation of localized energy generation especially for high energy users, or those with the facilities to install alternatives to the grid.

#### HT2 Update building bye-laws

We recognize the wish that by 2024 the energy efficient/carbon standards for existing properties will be improved at the point of key changes to the building fabric. Some of the buildings in the accommodation sector have been in use for several decades and the cost of upgrading these older buildings to modern building and energy efficiency standards can be prohibitively expensive. We have already seen accommodation units exit the market because of these costs, consequently, if the costs or penalties are too onerous, they might trigger a decision to stop trading.

- Consider the impact to the economy of losing parts of the tourism industry who cannot afford to modernize in the required timeframe

#### HT3 Energy Performance Certificates

Businesses recognise that energy performance certificates would enable a better understanding of the potential running costs of buildings being leased.

Concern was raised about the impact of the introducing certificates for businesses that currently occupy or own heritage buildings where controlling heat loss is, understandably, extremely difficult. Whilst recognizing the trigger for the requirement for an EPC certificate is the sale or re-rental of a property, further information is required with regards to 'minimum standards being brought in sequentially from 2026'.

- Consider what the 'minimum standards from 2026' should be and the impact these will have on listed or heritage properties.



General comment re heating, cooling and cooking

It is acknowledged that businesses will need to meet the cost of converting their heating and cooking systems away from fossil fuels. It should also be recognized that these costs do not just include the equipment itself but may also necessitate structural alterations and need to cover an upgrade to the electricity supply into the building.

There is little doubt that over time, and with new lower cost technology, conversion to cleaner energy will happen, but without an incentive that makes a real difference these changes will take place at a time that is most appropriate for the business.

To accelerate this change, subsidies must be set at an appropriate level and a green loan scheme could be an additional driver by providing interest free loans to mitigate the financial risk.

- Suggest that green, interest-free loans be available to aid investment away from fossil fuel cooking systems

Yours Sincerely,



Minister for the Environment  
Maritime House  
La Route de Port Elizabeth  
St Helier  
Jersey  
JE2 3NW

31<sup>st</sup> January 2022

Dear Minister for the Environment

Please find our submission below in response to the consultation on the draft Carbon Neutral Roadmap. Our submission has been developed after consultation with retail, hospitality and tourism businesses and is focused on the potential impact of the roadmap on these industries.

### **Transport Policies**

#### **T1 Speeding up adoption of electric vehicles**

We note that the emphasis in the roadmap is on electrification of transport, as this is the most viable option in the short term. However, the policy needs to be flexible enough to encourage the adoption of other low carbon alternatives and new technologies as they become available and cost effective. Electrifying the commercial vehicle fleet will require a substantial upgrade of the electricity network where the connection into property is not able to support increased demand and in areas where there is concentrated commercial activity.

The motor trade is in favour of and is knowledgeable about the benefits of electric vehicles. However, concern has been expressed about how realistic and likely it is to reach the ambitious number of electric vehicles targeted (34% by 2025) in the roadmap. This will be particularly challenging given the current proportion of electric vehicles on the road (1%) and the increase in numbers that will need to be imported annually (593%) and the overall availability of electric vehicles on the market.

We spoke to businesses that may change their vehicles to electric in the future and although some businesses knew about the environmental credentials and longer-term cost savings of running them, many were not. The price of electric vehicles and the availability of charging points were cited as the main barriers to purchasing now.

- Case studies showing potential savings may aid adoption of electric vehicles by the business community.

The roadmap is recommending a vehicle purchasing subsidy to encourage a purchaser to change from petrol or diesel vehicles to electric, however the subsidy, which will be 43% of the purchase price up to a cap of £3,500 is only available for vehicles that cost £30,000 or less. Most domestic and almost all commercial electric vehicles cost much more than £30,000 as a result the subsidy available will either not apply or have a have limited impact on the purchasing decision.

- The purchase price cap should be increased to a level that better reflects the actual price of an electric vehicle and there should be different caps for domestic and commercial vehicles.
- In addition, the % level of subsidy should be higher for commercial vehicles to reflect their much higher purchase price.
- Consider introducing interest-free green loans to purchase commercial vehicles to reduce the initial outlay and smooth the costs of changing to electric.
- Proactive engagement with the motor industry is crucial to support the industry in the supply of electric vehicles.
- Consider whether the target for electric vehicles is realistic and what additional measures could be put in place to encourage electric vehicle adoption.

The work with Jersey Electricity to roll out electric vehicle charging infrastructure is welcomed, however, the subsidy for installing a charger is only open to domestic properties. In addition, the installation subsidy only includes the cost of the charging point. In some homes an uprating 63 to 100 amps will be sufficient to include a fast-charging point. However, for many homes and for commercial premises, the added current could require the much more costly move to three phase supply, increasing installation cost by thousands of pounds. This cost will be a barrier to purchasing an electric vehicle, both domestic and business.

In addition, concerns have been raised as to whether there is a sufficiently robust electricity infrastructure on the island to meet the increased electricity demand not only for electric vehicles, but also from other uses. For example, a hotel should be able to be able to install electric heating, electric cooking, provide enough charge points for guests to charge electric vehicles and to supply the overall energy needed to run a business and support guests whose electronic activity constantly increases.

- Extend the charger installation subsidy to include business premises and ensure it is at a level that recognises all the costs of installation not just the charger itself.
- Consideration should be given to treating the electricity network upgrade as an Island project in the same way as the Island invested in the fibre telecommunications network.

It is noted that the plan is to continue to offer subsidised parking for electric vehicles until a new parking plan is in place. The current subsidy is not available to company owned vehicles and this could act as a disincentive for those many small businesses that may only own one vehicle, such as a small electric van that is used as both a domestic and business vehicle.

- Consider extending subsidized parking to include company owned electric vehicles.

In addition to the infrastructure requirements, consideration should be given to regulation of the size of the electric vehicles available and allowed on the Island, ensuring that they are fit for purpose and practical for Jersey's roads.

#### T2 The vehicle scrappage incentive

When there is little to no value in an existing vehicle which may be of poor quality and be high carbon emitting, the vehicle scrappage incentive is likely to encourage people to stop using their vehicle. However, it is unlikely to incentivise a move from an existing petrol or diesel vehicle to electric where the trade in value of the existing vehicle will be much greater.

#### TR4 Vehicle Emissions Duty incentive

We note that as and when low-carbon alternatives for commercial vehicles are available, their uptake will be incentivized through differential rates of VED. This may provide an incentive to switch to greener fuel so long as any costs to convert engines can be recovered through the reduced duty. In addition, vehicle warranties must permit the use of alternative fuel for this to be a realistic option.

Many businesses with fleets of vehicles, such as wholesalers, are reviewing the availability and suitability of new technology and will switch when the return on investment allows them to do so.

#### TR9 Bus Service development trials

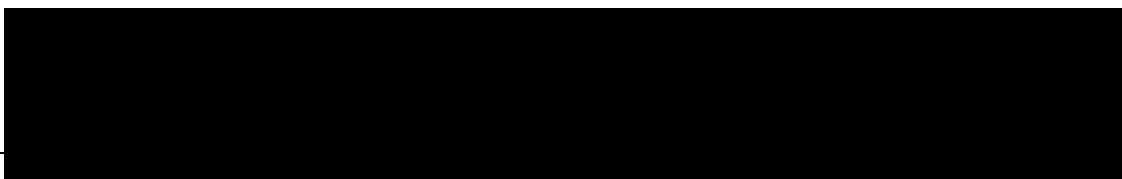
Jersey Business welcomes the bus service development trials and is supportive of the desire for a sustainable transport strategy, including an increase in bus services across the island.

#### TR11 Emissions from aviation and maritime transport

Jersey Business welcomes the proposal that the Government will work with Ports of Jersey to reduce emissions from aviation and marine transport.

In these discussions, consideration must be given to creating a long-term strategy that secures reliable services from as many ports, including French ports, are viable, whilst minimizing ongoing and unexpected increases in freight costs.

Yours Sincerely,



## Appendix 12.20: Jersey Chamber of Commerce written submissions



Chamber House, 25 Pier Road, St. Helier  
Jersey, Channel Islands, JE2 4XW.

Tel: 01534 724536

E-mail: [admin@jerseychamber.com](mailto:admin@jerseychamber.com)

Website: [www.jerseychamber.com](http://www.jerseychamber.com)

To the Minsiter for the Environment

The following submission relates to emissions policies and enabling policies on behalf of the Jersey Chamber of Commerce.

With increasing inflation, cost of living and costs of operations impacting our community and our businesses its essential that we take the positive initiatives of the Carbon Neutral roadmap further to ensure we have understand the cost of change, the affordability of these changes for business and individuals in order that we can ensure affordability, and that it does add further burden to either the costs of living or the costs of business operations to a point where we see ambitions that become undeliverable for us.

A positive outcome would be to see these costs of changes to ensure we can support fully or consider alternative funding methods

- Overall general position is of support in acknowledging the importance of change.
- Consultation period (17/12/21 to 31/1/22) at 44 days (28 working days) is too short, especially with Christmas/New Year holidays & Covid challenges. To be blunt this doesn't give confidence that the detail which will need to be worked on, especially with industry, will be achieved.
- "Detail": How can we be approving policy without detail. Each of the policies needs further research & understanding of implications & possibly new products & skills sourced, trialled & embedded
- Energy Trilemma" Page 28, (Affordable/Available v Green/Clean v Secure/Reliable) is so relevant to us. The 3 aspects must be continually & coequally considered. Rather than a "mad rush, because it's the right thing to do"
- Timeline; Page 43, figure 12. Bearing in mind items 3, 4 & 5 above; Jersey's emissions will be approximately 40% less that the UK by 2030 (let alone larger savings over France, Guernsey & the Isle of Man). Can we afford this? Will the products be available for us to achieve this? Are we being overly ambitious?

We are all going to have to accept that there is overwhelming evidence of climate change and our need to reduce emissions are imperative and accept there will be significant financial costs. We need to evaluate and understand where the costs will arise, what we can do to mitigate them and where we can get the best value for our green pound.

Measuring Scope 3 carbon consumption is challenging, but needs more research for projecting carbon consumption now, in for example, the food supply chain and localism.

We have had online consultation, but a CN Roadmap needs to closely involve business partners, to learn together what can work best.

An aspiration to be a global leader in achieving CN is on one hand inspirational, and on the other hand potentially fool hardy and bound for failure if we create unachievable targets. There may be areas where I imagine Jersey could aspire to be among the leaders, for example: EVs, helping to fund efficient small local farming methods, sustainable aquaculture and harvesting marine energy. The technological innovations we will require are not quite with us yet. Could there be an appetite for a Jersey investment fund to promote research and development?

Word Count: 670 words

Yours sincerely,

[Redacted signature block]

**TELEPHONE:**  
**E-MAIL:**

[Redacted contact information]

Deputy John Young – Minister for the Environment.

General Submission 31.01.2022.

DRAFT CARBON NEUTRAL ROADMAP.

Submission on behalf of the Jersey Chamber of Commerce.

Dear Minister,

As [REDACTED] Environment Committee I have been asked to make a short submission to the Consultation in respect of the Draft Carbon Neutral Roadmap (CNR) on behalf of elements of Chamber and some of its key sub-committees. I have avoided in this communication overmuch by way of comment on two key areas which will have been covered by Chamber membership through its links to other bodies who have lodged comprehensive responses to the consultation. This is our Building and Development Committee linked to the Construction Council and transport members linked to the Motor Trades Federation.

The detail contained in this submission is therefore basically a synthesis of comment emerging from an extended virtual session with elements of the Retail and Supply Committee and the Environment Committee held on the 13<sup>th</sup> January 2022 with representation from Government's Strategic Policy, Planning and Performance Department (Sustainability and Foresight).

The above session was one of several engagements with elements of Chamber in the build-up to the release of the CNR and its content and now of course have been invited to make this submission. As with other bodies Chamber in the context of this policy development represents a very broad church and many of our individual members and organisations will have certainly made representations on their own behalf. In general terms we have been given opportunity in the build-up to the Draft Roadmap in several forums and one-to-one sessions to make our diverse views known and to a degree we have as far as possible been made aware of the data and projections informing policy development in this case.

In general terms with the States Assembly having taken a decision on a target date for Carbon Neutrality (2030) and with the island having engaged in extensive public consultation on how this might be achieved culminating in the significant and successful exercise in democracy through the Citizen's Assembly we are generally supportive of the direction of travel in the CNR allowing for the fact that as always the devil will be in the detail. We are also aware that there is a full commitment in the CNR to continue dialogue particularly concerning the important Energy Market Review and development of transition plans to come over the next 12 months or so and then onwards into the creation of a possible Carbon Neutral Alliance in which Chamber would anticipate full engagement.

Chamber generally recognises that Jersey has much to do to move towards Carbon Neutrality and to meet the obligations in signing the Paris Agreement and that after decarbonising electricity to a large extent has slipped behind many other jurisdictions in terms of our current position so bold policy to drive things forward is now essential. There is comprehensive data on where our emissions currently come from and where we can make rapid progress and there is much to learn from other countries on what measures work and can be implemented quickly. There does need to be care taken however that we learn from other's interventions to ensure that delivery capability and capacity in particular is available to secure maximum benefit and that issues relating to skills and emerging technologies are resolved in advance of implementation.



It is understood that all sectors of the Economy have a role to play in the required forthcoming changes, something currently recognised by the island's Financial Services Industries and indeed to a lesser extent Digital who can and will bring their particular skills to the process. There will be significant costs to all in this including the individual but also to businesses of all types. The right balance between charges and incentives needs to be struck and the elements of fairness and indeed a Just Transition cannot be ignored. Should we only be talking about costs and expenditure at any point in time but rather look at these from the perspective of investment in the island's future where the longer term gains are also considered as the technology drives costs down. Reputational damage to the island if we lag behind should not be ignored and indeed there is a significant cost in doing nothing if we are to continue to be viewed as a progressive place to do business.

Though rapid change is desirable there is one key factor that must be taken into consideration. As with all changes of the types that are likely to come forward these need to be timed in for maximum benefit. There is much advantage in moving into new technological solutions when they are proven so ease of implementation of projects and policies align with good design and so that distributional impacts are understood and unforeseen consequences are minimised.

In line with these comments listed below are some observations from our key members / committees which might be considered in future consideration and policy refinement:

#### Transport Concerns:

Island currently served by old tech marine fleet which will be difficult to adapt to low carbon formats.

There is much legacy investment in-island in plant and distribution equipment particularly for fresh and frozen food and investment costs for replacement even if the required is available is substantial.

Replacement of diesel cars and perhaps light vans might be somewhat easier than for larger vehicles whose average lifespan is often way beyond 15 years. This also applies to all sorts of lightly used machinery in all sorts of locations and sectors across the island.

#### Transition Fuels:

Although the current assurances on availability and indeed the proposition to subsidise costs of transition fuels (bio-diesel) is understood as markets move heavily in this direction are supplies assured and will the support pricing be sustainable?

#### Tourism:

It is fully understood that one key forward growth area in the Travel Industry is going to be "Green Tourism" so the island needs to rapidly demonstrate that we are moving in the "right" direction. Access to more green lanes, electric hire cars (backed by charging facilities), Evie bikes and a better bus service are all key.

There could be problems on the horizon if taxes in the form of air passenger duty are introduced as island is not even now regarded as a low-cost destination. Changing the fleets, both marine and air, to use technology improvements to reduce emissions is key and the Ports of Jersey should be backing this.

#### Heating and Cooling:

Already concerns in this area similar to those for the vehicle fleet are substantial with legacy investment and likely hikes in costs making the prices in-island even more unfavourable to other jurisdictions. Establishing the data key here before changes are inflicted.

#### Skills and Training:

Know there are plans to tackle this issue, but will it be enough and meet timings required. Without skilled people available to handle what is coming the whole process could stall. The whole of the emerging population policy needs to take cognisance of what is needed, where and when.

#### Carbon Alliance:

If this comes about Chamber should and will fully engage. Understanding the data which needs to be comprehensive and accurate is key to positive involvement and good decision making and true cross discipline participation is vital to gain full benefit.

#### Carbon Offsets:

It is understood if we are going to be CN by 2030 then offsets are going to have a significant part to play. Although there is somethings that can be done in island many are going to have to be externally bought. There is a place for overseas aid partnership projects (Durrell?) but there are concerns around availability and escalating costs as all jurisdictions chase the same thing. One partial solution might be to intensify localism and reduce the dependence on Scope 3 emissions from outside island.

The above is far from definitive but gives an indication of Chamber members desires and concerns

In summary therefore the Minister is advised that Chamber, with allowance for differing views on policy details across its broad membership, is largely supportive of the Roadmap and the general direction of travel especially if there is a focus on early pace and drawing off the learnings from elsewhere. We do recognise the amount of work put into the project by SPPP and the strong evidence base that has been developed behind it and are also aware of the intention to on-going involve Chamber and its members as appropriate in the development of the final strategy.

For and on behalf of Jersey Chamber of Commerce

 Environment Committee

Word count: 1429



Chamber House, 25 Pier Road, St. Helier  
Jersey, Channel Islands, JE2 4XW.

Tel: 01534 724536

E-mail: [admin@jerseychamber.com](mailto:admin@jerseychamber.com)

Website: [www.jerseychamber.com](http://www.jerseychamber.com)

To The Minsiter for the Enviornment – Sent by email

The following submission relates to Heating Policies, from Chamber members Romerils on behalf of the Jersey Chamber of Commerce.

### HEATING.

1. Policies listed on Pages 66. Romerils are well positioned to comment, as we have been one of three main wholesalers in this market for decades.
2. Prohibits new fossil fuel boilers being installed in any property after 1st January 2026. We need to gain more understanding of the electric & renewable heating market, review existing & explore new suppliers. (See general comments item 7)
3. There is no detail on converting oil boilers that use kerosene to hydrotreated vegetable oil (HVO) (a renewable fuel). There must be 20,000 oil boilers in the market, swapping these boilers as they fail after 2026 will be a huge task. HVO could reduce the carbon emission for a transition period. Any residential property larger than two/two & half bedrooms will need a boiler of at least 15Kw. This is the maximum size of boiler that operates on a standard single phase electricity supply, so if the property needs more than 15kw then a three-phase supply is needed (dig up the road /drive/garden) This will cost approx. £8k with the new boiler being another £7k (minimum) So even with a £5k subsidy, this is expensive. Moreover, the electric boiler will cost 40% more to run! Air source heat pump will not suit many properties as the insulation will be below current standards.
4. New byelaws on insulation in new builds; Beware the costs of hitting these standards.
5. Vast majority of residential units are over 15 years old & therefore the standards of insulation are lower; its preferable to insulate rather than heat however the cost of retrofitting insulation is enormous including a shortage of labour. We underestimate the financial cost of this.
6. Page 104/5; HT3 Energy Performance Certificates; Legal requirement to reach minimum EPC standard at point of rental or sale by 2026. This is for residential, as well as commercial! There are very few people in Jersey who provide EPC, there must be many thousands of properties sold & rented each year. What is this minimum standard? Will it leave properties unavailable to occupy? Is there sufficient labour to insulate? What is the cost of insulation? Takes us back to the “Energy Trilemma” & “Funding a Just Transition”. Jersey already has a housing crisis & shortage of retail shops, could this inadvertently exacerbate this.

7. Jersey Electricity Company (JEC). The main drive is to eradicate fossil fuels, this will necessitate electric vehicles & electric heating systems. Therefore, how is the JEC equipped to heat circa 30,000 homes (that don't yet have electric heating) & charge 50,000 (my guess) vehicles? Page 102 Assumption; "That there is sufficient electricity capacity to meet the increased demand from these fuel switches". Surely, we need to verify this assumption before we proceed?! How quickly can the infrastructure be brought in? at what cost? How reliable is the French connection (post Brexit)? Page 29 states "the JEC ... gives a good return to shareholders"! Already a profitable company, what will their pricing strategy be? The Government own 62% of the JEC; what is their majority shareholding position on pricing of electricity & subsequent profit & dividend? I have full respect for the professional way the JEC is run & am not wanting to cast any aspersions against them; the carbon roadmap simply gives one company absolute power over the Island; it's dangerous. How should the Jersey Competition Regulatory Authority be involved?
8. Product "maturity" Page 30, points 4.12 & 4.15 are significant. Reliable & affordable products (with local engineers to service/repair) will take many years to establish themselves & early adoption will be expensive therefore care needs to be taken in setting deadlines that will be in advance of our major supply source (UK) as manufactures are working to their timelines, not ours.

Word count: 668 words.

Yours sincerely,

[Redacted signature block]

**TELEPHONE:**  
**E-MAIL:**

[Redacted contact information block]



Chamber House, 25 Pier Road, St. Helier  
Jersey, Channel Islands, JE2 4XW.

Tel: 01534 724536

E-mail: [admin@jerseychamber.com](mailto:admin@jerseychamber.com)

Website: [www.jerseychamber.com](http://www.jerseychamber.com)

To the Minister for the Environment. Sent by email.

The following submission relates to Transport Policies on behalf of the Jersey Chamber of Commerce Retail and Supply Group.

### **TR1 Speeding up the adoption of electric vehicles**

1. "For every EV subsidy a fossil fuelled car must be removed from the road." How is this going to work? As part exchanges are likely to be of a significant value and not ready to scrap although these part exchanges are likely to be purchased by owners of older more polluting vehicles who may well scrap their current cars.
2. Prior to grants commencing customers will not want to by an EV until the scheme is launched, conversely the trade will not import any prior to launch so there will be a period prior to launch when no EV's will be sold and following launch it will take time for dealers to source EV's for stock. It is imperative that the grant can be claimed for stock in trade cars so we can hit the ground running. It would also make sense to allow retrospective claims at launch to maintain/increase EV purchase in the prevailing months.
3. The purchase price cap of £30,000 is slightly too low as even a small modest Fiat 500 EV is over £30,000. We would suggest a price cap of £40,000 for cars and £50,000 for commercial vehicles like vans etc.
4. Although the Government expects price parity by 2027, we believe this will happen, but it will be achieved by the price of fossil fuelled cars raising to match EV prices which will not come down substantially like some people believe if anything the price of EV will continue to increase as many manufacturers are currently subsidising the price to achieve CAFÉ targets.
5. We welcome the Charger subsidy of £350 although we are very cynical that enough households, especially those living in flats will have the ability to install charging points to achieve the volume of EV's required in the plan. We also understand that the current feed to many households is not of the capacity required to install a single phase 7.4kw charging point. This means most households will have to charge using a standard 3pin plug charger which is a potential safety risk if used with and extension lead.

### **TR2 Vehicle scrappage incentive**

1. While we welcome the £500 scrappage voucher scheme the mechanism to control this scheme must ensure that people are not scraping an old car that was going to be scraped naturally while continuing to drive a fossil fuelled car not registered in their name.
2. The budget of £410,000 less £500 x 500 cars scraped (£250,000) leaves £160,000 which we are told is for marketing and administration. Is spending almost 40% of the budget on this a prudent use of resources?

### TR3 Supporting transition fuels

1. We welcome the 32ppl subsidy on second generation renewable diesel although feel it should be implemented immediately rather than 2023 and should be raised to make SGRD cheaper than conventional diesel. The current import duty on diesel fuel is 56.5ppl.

### TR4 Vehicle Emissions Duty (VED)

1. We would certainly expect EV vehicles not to attract VED.
2. Many average family cars currently fall into reasonably high VED bands so we must be careful not to adversely affect income inequality.

### TR5 End of the importation and registration of petrol and diesel vehicles that are new to the Island from 2030

1. We agree with the ending the importation of pure petrol and diesel cars in 2030 but must ensure that the importation of Hybrid cars is still permitted until at least 2035 and 2040 would be preferable as these still offer a much better alternative to full fossil fuelled cars.
2. The Targets quoted in the SMART objectives of achieving 66% of all vehicles being fossil fuelled by 2025 is impossible and it is unlikely that this figure can be achieved by 2030. DVS have confirmed that they had 127,661\* vehicles on their register at the end of 2021, of which 1365 were EV's. To achieve a figure of 34% EV by 2025 we will have to import 42,039 vehicles over 3 years equal to over 14,000 vehicles per annum. Below is a table of New and Used vehicles imported for the last 5 years which averages 6065\* per annum. We have no idea how this is going to increase to 14,000 per annum. In fact even if this figure was achievable we do not believe that the manufacturers will be in a position to supply this number of EV vehicles in the required timeframe.

	2017	2018	2019	2020	2021	Average PA
New Vehicle Registrations	4364	3951	3455	2661	2627	3411
Used Vehicle Registrations	2833	2728	2704	2310	2695	2654
<b>TOTAL Vehicle Registrations</b>	<b>7197</b>	<b>6679</b>	<b>6159</b>	<b>4971</b>	<b>5322</b>	<b>6065</b>

\*Figures supplied by DVSD

### Additional Transport comments from our membership:

Funding a Just Transition" Page 10/11 Especially item 1.13; there is a danger that the cost of carbon neutrality will cause dramatic inflation (in an already inflationary period) & will therefore adversely affect lower income residents. Private Aircraft; Jersey has more high net worth residents using private jets; if they refuel in Jersey, the fuel is then part of our carbon target. How is a "just transition" balancing hundreds of tonnes of this fuel (where cost / additional taxation isn't an issue) against those in society who are already struggling financially.

Emission from Maritime Page 98, Policy TR11; I presume Jersey carbon emissions are principally calculated on fuel sold from Jersey outlets. How are we measuring French pleasure boats refuelling in Jersey (because the fuel is cheaper)? It seems unfair that this carbon source is part of a target that Jersey citizens are going to have to meet & it's nothing to do with us

These concerns were also raised in these areas of Transport:

1. Policies listed on Pages 65/6.
2. Detail of increased duty & VRD on fossil fuel & vehicles yet to be finalised. Duty reduction on electric vehicles yet to be finalised. Until we know the duty changes how can we feedback?
3. What is the plan for Electric vehicle charging points?
4. Costs of mid-size & above electric commercial vehicles are exorbitant currently.
5. "Renewable diesel"; is it going to damage engines, if not then can we justify the extra cost? (Until a duty reduction comes in)
6. No petrol and diesel cars and small vans will be registered after 2030.
7. No classic or vintage vehicles allowed into Jersey from 2030 (the day I leave the Island!!)

Word Count: 1107 words

Yours sincerely,

[Redacted Signature]

**TELEPHONE:**  
**E-MAIL:**

[Redacted Contact Information]



## Appendix 12.21 Jersey Classic Vehicle Club written submission

**From:** [REDACTED]  
**Sent:** 26 January 2022 19:16  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Roadmap.

January 26<sup>th</sup> 2022.

Dear Sir.

I write in my position [REDACTED] of the Jersey Classic Vehicle Club and would like to express my feelings regarding a section in the Carbon Neutral Roadmap Policy Document.

REF TR Transport Policies.

Classic and Historic vehicles play their part in the heritage of the Island and also form part of many Islanders social lives including gatherings of various clubs in the Island and taking part in events such as the Boxing Day Run, Liberation Day celebrations, the Jersey International Motoring Festival and various static displays around the Island at country fairs and fetes.

Section TR5 of the policy states that no petrol or diesel vehicles would be allowed to be imported and registered from 2030 and I would request that consideration be given to exempt classic and historic vehicles from this section as there is only a limited supply of these vehicles in the Island. A mileage restriction could be imposed on these imported vehicles as they are used mostly for club events or public displays. I would also request that under the TR 4 section that these vehicles are exempt from Vehicle Emissions Duty.

Several of the Islands wealthy residents have collections of vehicles, these range from vintage, classic and modern day supercars. These cars are regarded as an investment, so surely it would be prudent to have a policy whereby future wealthy persons applying to move to Jersey after 2030 would be able to bring their vehicles with them.

[REDACTED] I would like to applaud the current government for moving forward with this policy and look forward to using the incentive scheme to moving to an electric vehicle in the next few years, however still occasionally enjoying a drive in my classic.

Yours Sincerely

[REDACTED] Jersey Classic Vehicle Club [REDACTED]

300 Words

## Appendix 12.22: Jersey Consumer Council written submission



Deputy John Young  
Minister for the Environment  
PO Box 140  
19-21 Broad Street  
St Helier  
JE4 8QT

8<sup>th</sup> February 2022

Dear Deputy Young,

### **Draft Neutral Carbon Roadmap**

I write on behalf of the Jersey Consumer Council to provide the members' response to the above document. As you are probably aware, to appropriately represent the Island's consumers, our members come from diverse sections of our community and have differing opinions about the Draft Carbon Neutral Roadmap.

Overall, the Government's aim to reduce carbon emissions is accepted as a good policy, yet there are several points the Council wish to make.

- The Council's biggest concern is that many Islanders will be negatively impacted both financially and by the suggested timeframe.
- The proposed financial subsidies are insufficient, especially with low to middle income earners struggling with ever increasing prices of essential goods, like food, energy and fuel, and the reduction, and expected eventual removal, of GST de minimis on imported goods.
- Many Islanders still need to be convinced of the benefits the changes will bring.
- The current proposal hinders development of alternative fuels.

Yours sincerely

[Redacted Signature]  
[Redacted Name] Jersey Consumer Council

## Appendix 12.23: Jersey Construction Council written submissions

### Carbon Neutral Roadmap consultation - Enabling policies

For the attention of the Minister for the Environment

Submission from the Jersey Construction Council relating to the Carbon Neutral Roadmap consultation

Contact: [REDACTED] [Info@jerseyconstruction.org](mailto:Info@jerseyconstruction.org)

		Page	Ref	
EN1	Decarbonising government			Government must lead on all the initiatives contained in this document and ensure a steady, managed stream of work so the industry can respond and meet these demands
EN2	Create a Carbon Neutral Alliance			The JeCC would welcome the opportunity to be involved in this.
EN3	Developing supply chains and on-Island skills for a sustainable economy	59		<p>The industry has a proven track record in developing new skills. What plans are in place and when will they be made available</p> <ul style="list-style-type: none"> <li>• Training needs to be made available locally, working closely with Highlands college.</li> <li>• Training must be ahead of the curve, so the industry is ready for when policies are adopted</li> <li>• Are Highlands already planning for the new skills required?</li> <li>• Will training be funded?</li> </ul> <p>There are subsidies for ASHP, but not insulation; what happened to fabric first?</p> <p>There are currently no cavity wall firms on-island. What is being done to address this issue.</p> <p>There is currently a shortage of PassivHaus experts on-island. What is being done to address this issue.</p>
EN4	Delivering COP26 education pledge			No comment
EN5	Blue carbon, biodiversity, and sequestration			No comment
EN6	Carbon offsets	36		What assistance and guidance will Gov. give to firms considering purchasing Carbon Offsets?
EN1	Decarbonising government			Government must lead on all the initiatives contained in this document and ensure a steady, managed stream of work so the industry can respond and meet these demands
				236 words

## Carbon Neutral Roadmap consultation - Heating policies

For the attention of the Minister for the Environment

Submission from the Jersey Construction Council relating to the Carbon Neutral Roadmap consultation

Contact [REDACTED] [Info@jerseyconstruction.org](mailto:Info@jerseyconstruction.org)

		Page	Ref	
HT1	Supporting low-carbon heating systems and home insulation	52	7.27	<p>The first 3-year window for subsidies, is documented to cover just under 1000 domestic boiler changes, with the remaining 15,000 being undertaken by 2030. This seems like a weak start to tackling the problem.</p> <p>The public are being asked to move to a potentially more expensive source of heating without the apparent checks on whether their home has an efficient building fabric first. One element of a bigger picture which could require homeowners to insulate, review moisture reduction methods and consider their carbon footprint.</p> <p>The qualification to receive the grant is unclear but means testing is noted.</p> <p>In addition to the heating technologies listed, storage heaters, smart panel heaters, cable underfloor heating and freestanding electric heaters are all energy efficient and compatible with net-zero with a decarbonised electricity supply</p>
		53	7.33	<p>The process to administer the grant funding must be simple and easy to access. Who and how will this be administered?</p>
HT2	Update building byelaws	53  66	7.33  HT2	<p>Current Byelaws focus on energy and not emissions unlike the UK. What plans are in place to address this anomaly?</p> <p>The review of the Bye Laws is to be undertaken this year, then be reviewed again?</p> <p>The implementation of change is noted as 2024, which seems a long way away.</p> <p>No new Oil boilers from 2026 – unclear if biofuels could prevent this.</p> <p>Aspiration for Zero Carbon Buildings by 2026 needs to be reached in increments to allow the industry to make achievable.</p>
HT3	Energy Performance Certificates	66	HT3	<p>EPCs are the mechanism to set a benchmark for the island's performance, therefore these need to be undertaken as soon as possible in public buildings as well as domestic. EPC's are not possible yet on commercial – this process needs to be fast tracked.</p> <p>The incentive for undertaking EPCs will only cover 825 domestic homes, which seems fairly incidental.</p> <p>Current EPC's generally don't offer any additional value to the homeowner that a reasonably skilled industry operative could not offer for free. The majority of measures are aimed at energy reduction and not carbon reduction. The EPC outputs therefore need to be addressed and made to focus on emissions. Therefore, as a part of the future EPC, will the main heating source be included in the survey and form a part of the recommendations for improvement.</p>
				395 Words

## Carbon Neutral Roadmap consultation - Other policies

For the attention of the Minister for the Environment

Submission from the Jersey Construction Council relating to the Carbon Neutral Roadmap consultation

Contact [REDACTED] [Info@jerseyconstruction.org](mailto:Info@jerseyconstruction.org)

		Page	Ref	
OE1	Promoting low carbon lifestyles			The industry is supportive and committed to working with Gov to identify workable solutions
OE2	Construction sector emissions	33 44 55 66	OE2	<p>This challenge is not unique to Jersey and there is some good work being done in the UK in this space. To establish Net-Zero construction practices, Government will need support industry in obtaining the necessary carbon emissions data. In order to ensure businesses can measure and account for their activities, emissions factors for all materials and fuels must be approved and provided by Government.</p> <p>As with financial performance, it should be the responsibility of a commercial enterprise to report on its Carbon emissions; Government should detail the reporting requirements and facilitate methods of calculating these for a standardised approach.</p> <p>Modern construction methods are not limited to BREEAM, PassivHaus, Ennerfit. Gov must decide what standards are to be used and more importantly, what are best suited to the Jersey market. Furthermore, the decision to demolish and rebuild versus the retain and refurbish conundrum must be carefully evaluated.</p> <p>There is also a strong construction related response in the Transport section.</p> <p>The Jersey Construction Council is committed to working with Government on this journey and as a major infrastructure facilitator, and local employer, is fully committed to a zero-carbon future.</p>
OE3	Agricultural sector emissions			No comment
OE4	Emissions from waste and water management			No comment
OE5	F-Gas emissions	67	OE6	HFCs were used to replace the ozone depleting gases because they have zero impact on the ozone. However, HFCs are greenhouse gases that contribute to climate change. Any views on this?
OE6	Delivering a sustainable finance framework			No comment
				276 words

## Carbon Neutral Roadmap consultation - Transport policies

For the attention of the Minister for the Environment

Submission from the Jersey Construction Council relating to the Carbon Neutral Roadmap consultation

Contact: [REDACTED] [Info@jerseyconstruction.org](mailto:Info@jerseyconstruction.org)

		Page	Ref	
TR1		49	7.14	<p>Speeding up adoption of electric vehicles</p> <p>Most new commercial electric vehicles would cost in excess of £30k. In an attempt to encourage electric vehicle uptake in the industry, grants should be available for all alternative energy (including, for example green hydrogen) vehicles, irrespective of cost capped at, say £3500 per application.</p> <p>Currently the Eco-Friendly Parking Permit, a therefore the half priced parking is not available for commercial and business registered vehicles. It is recommended that this change as a part of the package of measures to encourage the switch to zero emission vehicles. Applications should be electronic, or app based to ease uptake.</p> <p>The incentive for domestic electric charging infrastructure (£350 subsidy) should be extended to commercial premises also. The benefit per vehicle is likely to be much higher in a commercial application given the daily miles driven and therefore should not be excluded from the initiatives.</p>
		78	TR1	<p>The installation of modern domestic electric vehicle charge points is well within the current skillset and capabilities of the Islands electrical contractors. Most of these are already NICEIC or NAPIT registered and follow the 18<sup>th</sup> edition of the electrical wiring regulations.</p> <p>Subsidy for installation should only be available through accredited electrical contractors.</p>
TR2	Vehicle scrappage incentive	65	TR2	<p>‘vehicle scrappage scheme to target the most polluting vehicles. Petrol or diesel cars or small vans that are over 10 years old’</p> <p>This proposed fund would be better used incentivising the importation of alternative energy vehicles, both new and used, in an effort to bring entry level pricing down. Or the fund used in supporting transition fuels to allow those committed to existing diesel-powered vehicles thus reducing inequality.</p>
TR3	Supporting transition fuels	30 49	4.15 7.15	<p>Biofuels are welcomed as an alternative to traditional fossil fuels. There are a few points to raise</p> <ul style="list-style-type: none"> <li>The use of SGRD is a significant opportunity to reduce the carbon emissions associated with HGV use and is therefore an important element for the construction industry.</li> </ul>

				<ul style="list-style-type: none"> <li>Currently there is only one importer. How does the government propose to ensure widescale availability and competitive pricing?</li> <li>The government should understand that diesel type powered vehicles and equipment will continue to be used when there are no electric alternatives.</li> <li>Where there are no EV alternatives extra-subsidised biofuels could be ringfenced for larger commercial vehicles. This would be like Red Diesel. This ensures this valuable resource isn't used up in the cars or small vans sector where there is an electric alternative.</li> <li>The continued use of existing fleets to maximise the benefit of the existing assets is the more environmentally sound solution, provided these are well maintained as per the operators' licencing requirements.</li> <li>It is recommended that the proposed subsidy of 32ppl be increased to ensure parity with conventional diesel. This could include increasing the duty on fossil fuel diesel to bridge the gap. This is vital if the Government is to encourage businesses to change on a wholesale level.</li> <li>Any subsequent revisions to the subsidy should be made only to maintain parity with the cost of diesel/ fossil fuel. Reducing the subsidy without increasing the duty on fossil fuels will encourage a reversal of positive change.</li> <li>Supply of fossil fuel diesel to Jersey should cease by 2030.</li> </ul>
TR4	Vehicle emissions duty incentive	65	TR4	The VED changes are welcomed. However, consultation is requested regarding the future VED for commercial vehicles.
TR5	End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030	65	TR5	Based on the assumptions in TR5 this is acceptable to the industry.
TR6	Review Roads Law			Review in consultation with industry in relation to modern and future vehicular technologies.
TR7	Green number plates for electric vehicles	65	TR7	<p>This is unlikely to be a good use of government resource. Marketing of green credentials will be done by businesses. The money and government resource would be better spent on tangible benefits.</p> <p>A better idea would be to offer the half-priced parking via the Eco Friendly Parking Permit, which is not available for commercial vehicles at present</p>



TR8	Sustainable Transport Roadmap	48	7.6	The industry is supportive and committed to working with Gov to identify workable solutions
			7.8	The industry is supportive and committed to working with Gov to identify workable solutions
			7.9	The industry is supportive and committed to working with Gov to identify workable solutions
TR9	Bus service development trials			No comment
TR10	Active Travel			The industry is supportive and committed to working with Gov to identify workable solutions
TR11	Emissions from aviation and marine transport			All industries should review the past two years and actively discourage business travel where digital alternatives are suitable. The government is encouraged to use fiscal levers to maintain this change.
				794 Words

## Appendix 12.24: Jersey Electricity written submissions

### DRAFT CARBON NEUTRAL ROADMAP

#### Jersey Electricity comments 5

#### PART C - Delivery Plan

##### Emissions from heating, cooling and cooking

###### Reduce demand for energy (7.20-23)

Energy efficiency and conservation have vital roles in reducing energy demand and carbon emissions, and for the most part are already available. We have seen between 15% and 20% increased efficiencies achieved with these measures and we welcome policies to enable wider application as indicated in HT1 that references 'support for home insulation'. Initially, however, we foresee an increase in electricity usage to c. 2034 which we are prepared to invest to meet. Energy efficiency measures installed after this date will reduce peak demand and usage going forward. The increasing efficiency of appliances will also reduce energy demand. Detailed information we capture on network loading will enable us to optimise investment in network development for these scenarios. (*Further comments on 5.1-5.3*).

###### (7.31)

Our studies indicate that increased volumes of electricity flowing through the network will help unitise or spread fixed costs, leading to lower prices for consumers than might otherwise be the case. This will require some allowances, for example in road reinstatements, securing substations sites, etc. (*Further comments on 3.11*)

##### Supporting low carbon heating systems and home insulation (HT1)

GoJ estimates that the domestic fossil fuel boiler market = 21,559 boilers. The target is to have 16,000 fossil fuel boilers switched / replaced by 2030, aided by an incentive scheme worth £5.7m over the first four years. (The Oxera report [Ref: *Quantitative analysis of carbon neutrality by 2030; January 2020*] indicates the investment required to achieve net-zero by 2030 in the heating sector of between £51m - £59m).

The low-carbon heating systems target of 998 fuel switches over four years (2022 to 2025) appears extremely low in relation to the overarching target of 16,000 by 2030 – just five years later. Fuel switching will have a fast and critical impact on the Roadmap targets and technologies are readily available.

##### Increased targets and funding

We estimate fuel switching rates (without incentives) are currently 400-500 per year. Over four years this is circa 1,800, twice the level that the grants are projected to support. We'd like to see GoJ consider increasing this target to 2000 - 3000 with increased funding allocated to this key carbon-reduction activity.

We would also suggest that subsidy assessments be based upon the technology that provides the largest carbon reduction outcomes. We'd also like to understand what the '*specified alternatives*' that would be eligible for grant support clearly defined. We believe burning alternative fuels should only be used as a last option and other measures or technologies may not lead to lower carbon emissions. We clearly need to understand these alternatives before we can assess them.

We would also suggest GoJ may wish to consider using available funding to provide interest free loans to the full value of the conversion to extend the reach of such funding further.

## Low-carbon heating systems

7.29-7.30 questions the suitability of low-carbon electric solutions for *'difficult-to-heat'* buildings and that biomass boilers may be a more appropriate solution for removing such buildings from the gas grid or oil heating. High temperature and hybrid heat pumps linked to electric flow boilers have higher operating coefficients and output temperatures making them appropriate for almost all properties looking to convert from gas or oil and would result in a 90% reduction in carbon emissions.

For example, Vaillant states its [aroTHERM](#) plus heat pump *'can be used in existing buildings as an alternative to current systems.'* Daikin's new [Altherma 3 H HT](#) *'allows retro home with traditional heating which previously would struggle to install a heat pump, to now switch to a greener more cost-effective solution'.*

Unlike biomass and liquid biofuels, these solutions are readily available. JE is already working in partnership with parishes to convert difficult-to-heat buildings with a combination of hybrid heat pumps, flow boilers and solar arrays.

Storage heaters, smart panel heaters, cable underfloor heating and freestanding electric heaters are all also 100% efficient, easy to install and compatible with our decarbonised electricity supply. We believe, however, that due to the ease of installation and running cost benefits, electric flow boilers offer the best potential to get most buildings off the gas grid.

## Biomass as last resort

We believe burning alternative fuels should only be used as a last option where alternative low-carbon (electric / or zero emissions at point of use) solutions do not exist.

- Burning biomass generates harmful toxins. It releases particulate matter, nitrogen oxide, various carcinogens and carbon monoxide. We suggest considering a hierarchy of technologies and fuel types based not only on CO2 emissions but also air quality.
- Seasonal restrictions and transportation of fuels to support biomass boilers can result in supply chain issues. Transportation also increases emissions. Supply chains are less established and certified and are likely to come under increasing pressure.
- Biomass boilers are larger than conventional boilers and require extra storage space for fuel. These factors and the access required for fuel deliveries may make them unsuitable for high density communities.

## Installation costs

The Roadmap refers to *'the upfront costs of installing low-carbon heating systems to be currently higher than reinstalling a fossil fuel system'*. It is our experience that many all-electric heating systems are available at cost parity with many fossil fuel-based alternatives, especially when supplier-based discounts are removed.

## Journey to decarbonised heating, cooling and cooking

Of concern and a point on which we would appreciate clarity is reference during 2020-2030 to *'Islanders start using replacement renewable fuels in their existing boilers for heating'*. And during 2030-2040: *'Remaining domestic fossil fuel boilers will have switched to using replacement renewable fuels.'*

Is GoJ proposing use of HVO/biofuels for domestic heating i.e.: zero-carbon heating?

- The HVO production process itself is energy intensive and currently the hydrogen used comes from natural gas.

- Demand is increasing and supply is limited. New production plants are still some way off and finished fuel is shipped long distances.
- Using land to grow fuel rather than food is leading to deforestation, which itself is contributing to global emissions.
- Will GoJ commit to increasing the subsidies for HVO as the cost of the fuel increases, and how will it ensure the subsidy is not underpinning supplier profitability?

We would suggest that GoJ create a hierarchy of the approach to fuel use and decarbonisation, as they have done with transport, focusing effort towards zero emission solutions being the highest priority.

## **Cooking**

We are already converting kitchens in hotels, restaurants and takeaways to low-carbon all electric solutions with impressive carbon and resource savings (water and chemical usage). We would like to see GoJ offer more support to commercial catering which, as a sector, could contribute to a significant reduction in emissions for every pound invested.

## **Building bye-laws (HT2)**

We welcome legislation that improves energy efficiency standards. We would also recommend that any current planning and building regulations processes that impact on the ability to or restrict the opportunity to decarbonise are open for review.

We understand that local building bye-laws were changed from the UK model definitions for Target Emissions Rate (TER) and Building Emissions Rate (BER) to an energy basis. We would recommend that these revert to the UK TER and BER approach and focus on local emission impacts and reductions as this is the objective of the CNR policy interventions.

We commend the proposal to ban replacement gas and oil boilers from January 2026 but need to be mindful of the risk that homeowners may rush to replace their current boilers to 'beat the deadline'.

This may result in:

- Boilers being replaced before their 'expiry date' to 'beat the deadline'
- Labour being diverted from low-carbon installations
- Having fossil fuel boilers in situ into the next decade
- Slowing down the transition to specified alternatives

Switching these boilers to using HVO or biofuels would still result in residual emissions that would have to be offset post 2030.

## **Energy Performance Certificates (HT3)**

Could GoJ lead the way by displaying EPCs for public buildings by 2023 (rather than 2025) and have a plan by 2025 to reduce emissions from these buildings by a further i.e., 40%. By showing ambition and drive, GoJ would help to lead the market in the right direction and be an example of what can be achieved.

825 energy audits over four years, equates to an average of 206 per year across a domestic fossil fuel property stock of c.21,559 premises. Could GoJ give context to the target by referring to the current number of domestic audits per year being carried out?

UK EPCs are accessible online by the public. Are there any plans to make Jersey EPCs publicly available?

We believe EPCs' recommendations should focus on interventions that provide the greatest emission reductions and list these in order of impact. The EPC tool should also be able to

recommend low-carbon heating and renewable heat pump solutions which it fails to do. We believe this should be integrated into the updated tool to integrate with current carbon factors for all locally available fuels.

Words:1,500

**Jersey Electricity**

# DRAFT CARBON NEUTRAL ROADMAP

## Jersey Electricity comments 6

### PART C - Delivery Plan

#### Other emissions policies

##### Construction sector emissions (OE2)

We would recommend the focus be on an emissions reduction target and on-island emissions.

##### Emissions from waste and water management (OE4)

Carbon capture capability could be fitted to the existing Energy from Waste Facility and potentially be re-used for the replacement plant in 2038 or at the end of life of the core asset. The EfW plant's emissions are allocated to electricity production and significantly increase electricity's carbon content (albeit distributed electricity is very low carbon at 23g CO<sub>2</sub>e/kWh due to extremely low emissions associated with nuclear and hydro sourced power). Carbon capture could, therefore, have one of the most significant emissions reduction impacts by reducing the carbon in all of electricity's applications, including transport. There may also be possibilities to reuse CO<sub>2</sub> captured in other processes on Island. *(Further comments on 6.4)*

##### F-Gas emission (OE5)

Like most power utilities we utilise sulphur hexafluoride (SF<sub>6</sub>) gas for electrical plant. We are aware of the potency of this as a 'greenhouse gas' and we avoid its use where possible.

We have a long-standing policy not to use this in equipment where there is a viable and effective alternative. As a small utility, we have limited influence in manufacturers' R&D, however we encourage alternative technologies where possible. We also regularly monitor the market for technological developments for alternatives. We maintain and monitor SF<sub>6</sub> gas inventories, within our reporting.

## 9. Enabling policies (EN 1,2,3,5,6)

### Decarbonising government (EN1)

This policy states, *'to implement practical decarbonisation actions including phasing in second generation renewable diesel (SGRD) from 2022'* and has the *'aim of decarbonising the Government vehicle fleet by 2025'*.

We believe that SGRD/biofuels should only be supported where no other viable low-carbon alternative exists. As with EPCs on buildings, could GoJ set an example by decarbonising its fleet of more than 600 vehicles. Alternative zero-emissions vehicles (ZEVs) / electric solutions exist for much of this fleet and could be considered as part of a hierarchy of interventions planned to reduce GoJ fleet emissions.

We believe to opt for SGRD for those which can readily be changed out for ZEVs would be sub-optimal, increase future risk and set the wrong example as local emissions would remain as part of the combustion process. *(Further comments on TR3)*

We suggest GoJ could set some ambitious 'smart' objectives within their policy for the transition of its fleet, as other companies in Jersey have done.

### Create a carbon neutral alliance (EN2)

Will the Carbon Neutral Alliance replace or work with the Jersey Energy forum? We fully support such an initiative as a way of involving the whole community, large and small

businesses and NGOs etc to reinforce the 'people powered approach' to transition and we would be willing to offer our expertise to help and advise such a body.

### **Developing supply chains and on-Island skills for a sustainable economy (EN3)**

Can GoJ provide a better definition of what they define as '*low-carbon services and goods*'. Perhaps some smart objectives would be useful in this area. We feel it is vital for a 'just transition' that those currently employed in sectors negatively impacted by the transition to net-zero are not only re-trained but offered employment opportunity at the end of that training. This will require collaboration between training bodies and trades to ensure those affected are protected and invested in. Again, JE will offer any support it can in this vital area.

### **Blue carbon (EN5)**

We fully support blue carbon sequestration and believe Sea grass habitat could be established on our submarine cable corridors, on the understanding that there could be some removal if repair works are required, or the asset is replaced in the future. We believe investment in local carbon sequestration that keeps funding within our community – and could even lead to inward investment in this area – is far preferable to purchasing international carbon offsets (see below).

### **Carbon offsets (EN6)**

We believe the estimated £2.5m -£5m for carbon offsets could be better used on reducing the root cause of emissions within the Island. This will also benefit the local economy. We believe offsets should only be considered when other emission abatement interventions have been exhausted and not used as a substitute. (*Further comments on 4.5*)

Words: 715

 Jersey Electricity 



# DRAFT CARBON NEUTRAL ROADMAP

## Jersey Electricity comments 2-

### PART A

#### Building the foundations

##### A roadmap for the future (1.8)

We have invested c. £200m over the last 10 years to build a zero-carbon platform and we stand ready to invest significantly more to help Jersey transition to net-zero. The return on that investment will only be realised over many years, so we need policy and regulatory certainty. There is risk of stranded assets and higher costs and, ultimately, higher electricity prices for consumers if the predicted revenues the investment is based on are not realised due to changes in policy positions over time.

#### The context for decarbonisation

##### Bridging Island Plan (3.11)

We need to ensure that development control supports the transition by facilitating the provision of infrastructure. This might include siting substations in rural areas, permitted development for key infrastructure assets which would reduce time and costs associated with securing approvals for each installation.

##### Energy markets and Brexit (3.23-3.24)

Although Jersey is not immune to global energy market volatility, our electricity consumers have been largely shielded from the worst effects of recent volatility due to our hedging policies and contract framework. In addition, as Jersey's electricity supply is already decarbonised, prices are not subject to the green tax levies imposed in the UK. Jersey has therefore managed to decarbonise the grid without levying additional charges in the same way as the UK. The 4% tariff increase implemented on 1 January 2022 was only the fourth in Jersey in seven years and added around 80p a week to the average domestic bill. We feel the reference: '*with recent substantial increases in the price of all energy types*' implies this includes electricity which is not the case.

The Review of Energy Mix Options (Nov 21) broadly concludes that biofuels can provide solutions in the transport and heating sectors short term, but biofuels are problematic for various reasons, and we question their use in applications for which cleaner electric solutions are already available. (*Further comments on TR3*)

#### Strategic policies

##### Strategic Policy 1: Jersey's net-zero emissions pathway (4.5)

It is questionable whether the existing Roadmap policies are sufficient to put the Island on a net-zero trajectory by 2050. We feel additional policy measures, or a deepening of the proposed measures should be identified and planned in now to ensure delivery of net-zero by 2050 or earlier is possible with the interventions contemplated.

We believe that the scale of carbon reduction we can achieve with abatement projects means carbon offsetting should be a last resort. Purchasing carbon offsets before all carbon abatement technologies have been exhausted would divert funds from zero-carbon solutions that could tackle the root cause permanently.

It is important the Island allocates its limited available funds to carbon reduction areas that provide the biggest and fastest carbon reduction opportunity – notably road transport and

home heating. In most cases, technologies are already available to abate the vast majority of carbon emissions at a local level and this would be more effective in terms of cost per unit kgCO<sub>2</sub> avoided. It is also least risk. The Island will be less vulnerable to pricing volatility of offsets (and biofuels) and issues around authenticity and traceability and local abatement measures would be of more benefit to the Island economy. (*Further comments on TR1, HT1*).

## **Strategic Policy 2: Island energy market**

We are pleased that the role of imported electricity is acknowledged as *‘having served the Island well’* in terms of balancing the trilemma of sustainability, security and affordability, and that it is key to further rapid decarbonisation of road transport and space heating.

We recognise that rapid electrification using low-carbon grid power is the fastest and most economic route to net-zero. We believe the use of non-fossil second generation biofuels (SGRD) may have a small role in selective ‘difficult-to-electrify’ transport solutions such as aviation or shipping however, in most cases – and certainly road transport and building heating/cooling – electric solutions are available now and are least cost when assessed over the life of the investment. There are other supply chain issues associated with biofuels that also need to be carefully considered.

### **Skilled labour (4.14)**

From a network management perspective, it is realistic to assume that many trades people could transfer or develop new skills to meet the challenge of transitioning from fossil fuels. We are increasing recruitment and the breadth of our skills and capabilities in readiness for the heightened demand the transition will bring. We do believe the Island needs to invest significantly in the development of skills, with further collaboration across stakeholders (Highlands, public-private partnerships) to implement more measures, especially trade skills required beyond the meter in customers’ homes and businesses. This requires significant policy support and funding which we would like to see addressed further in the Roadmap.

### **Renewables (4.19)**

Though local renewables, such as solar, wind or tidal power, will not reduce carbon emissions they will increase supply diversity and could improve energy sovereignty. Large scale renewables, such as offshore wind, could become cost effective for Jersey and we are working hard on this as an opportunity for the Island, but the capital investment required could result in costs being materially above current imported market rates in the early stage.

Its intermittency means we would still need to rely on interconnectors which provide power on-demand at any time, including in the winter when demand is highest, and the wind may not blow, or sun will not shine. We estimate that a 150MW wind farm will produce approximately 50% of current energy demand, but this could be less than 50% of actual *peak* winter demand. Solar production on a winter’s day is typically less than 10% of summer production and demand is significantly higher notably in the evening when there is no daylight.

A back-up importation model would affect contracts which are currently based on high levels of constant importation and, as such, would have cost implications.

Longer term, energy storage is likely to improve the usefulness of on-Island renewables, but such technologies are still at an early stage of development, and are not yet cost effective, while also requiring considerable land.

It is possible that large scale renewables could provide energy for hydrogen production (by JE or others), supporting other sectors locally, but this would require other infrastructure and,

like biofuels, hydrogen will be much more expensive in those applications where electric solutions already exist. Hydrogen also suffers from high conversion losses.

### **Integrated systems**

Managing the integration of large- and small-scale renewables to the network presents challenges. Current investment in other technologies such as smart metering and network monitoring may allow proactive management of demand, with heating being managed by energy availability. Investing in delivering utility scale renewables and also incentivising micro renewables could be counterproductive, with one type effectively offsetting the other at twice the cost. We anticipate managing an integrated system to maximise assets and energy availability. This will mirror the Distribution System Operator model being developed in the UK.

Developing on-Island utility / commercial-scale ground / roof-based solar solutions are technically available now and could contribute more to the Island's needs going forward.

### **Regulation (4.20)**

We are aware that increased demand for electricity could attract greater scrutiny or regulation. We would, however, caution that increased and potentially punitive regulation could threaten the model on which infrastructure investment is based, deterring that investment, affecting the position and leading to increased costs and higher prices with few benefits to customers.

### **Strategic Policy 3: Financing Strategy**

We agree with hypothecated revenue and that serious consideration should be given to a carbon tax or fuel duty to provide a disincentive to emitting carbon, with the funds raised invested in low-carbon solutions. Currently, the true cost of the environmental damage caused by burning fossil fuels is not properly reflected in the price of fossil fuels i.e., it is 'free to pollute'. In the absence of a carbon tax or similar disincentive, fossil fuel consumers are being subsidised by the community, who will ultimately have to pick up the cost of removing that carbon from the atmosphere to reach net-zero by 2050.

### **Strategic Policy 4: Programme and Development**

We believe the focus should be weighted towards those measures that deliver the fastest and highest on-Island carbon reduction per unit of investment. However, measures should be put in place to protect the vulnerable on a means tested basis and we believe this can be done using the funding from new revenue streams. We also support GoJ's people powered approach and agree there is opportunity to involve all stakeholders in joint commitments and initiatives.

### **Strategy Policy 5: Becoming carbon neutral**

We believe we should develop new projects in local sequestration that keep funding within the Island. We believe that the Island should develop a carbon neutral plan, examining those activities that can reasonably be abated and those that will ultimately require procurement of high-quality carbon offsets. These should only be purchased from high quality, authentic and traceable sources.

*Words:1,491*

# **DRAFT CARBON NEUTRAL ROADMAP**

## **Jersey Electricity comments 3**

### **PART B**

#### **The Roadmap**

##### **(5.1-6-1)**

We have looked at high, medium and low peak network demand scenarios based on the draft Roadmap. We assume an initial high uptake of electric solutions to make an early and critical impact on the Roadmap will create a rapid increase in demand until 2026, with continued growth until 2034. We are ready to further invest significantly in the network to meet this demand but need Jersey to continue on a strategy means these assets will be used over the long term. Importantly for consumers, if this were the case, we believe we can stage the investment to avoid it causing significant increases in electricity prices as this will lead to network efficiency improvements.

Logistically, some form of policy or exemption from existing regulation and legislation would help us achieve the necessary network reinforcements more quickly, for example allowing access to install cables in roads at less favourable times with reasonable reinstatement requirements, planning permissions to install substations, etc. Removal of requirements will also reduce costs and contribute to a more just transition.

#### **Ensuring public support for works**

Initiatives such as embedding IHE highway engineers in our Planning and Construction teams to prioritise roadworks and work proactively on substation site selection, etc. We would like to see these activities carried out under the optic of the Climate Emergency, with GoJ departments working collaboratively and ensuring public support so this is viewed as a community effort.

We believe that heating efficiency, supported by the insulation subsidies (HT1 additional elements) and increased thermal performance of buildings driven by improved building regulation standards etc. will take effect from 2030 and continue to 2050, and will result in a 10% reduction in demand from the highest levels. We have also assumed that a 'technology effect,' with smart ultra-efficient appliances being managed to suit lifestyles, could reduce peak demand by a further 10% by 2050. We have ignored general appliance efficiency however, French distributors RTE suggest this could be as much as 50% by 2035.

#### **We will optimise investment to match demand**

Post 2034, energy consumption will grow modestly, but this will be matched or exceeded from further efficiency gains. The overall effect is that network demand is likely to slowly reduce from the demand experienced at 2034. Our aim will be to utilise our detailed network loading data to optimise investment in the network to match this trajectory.

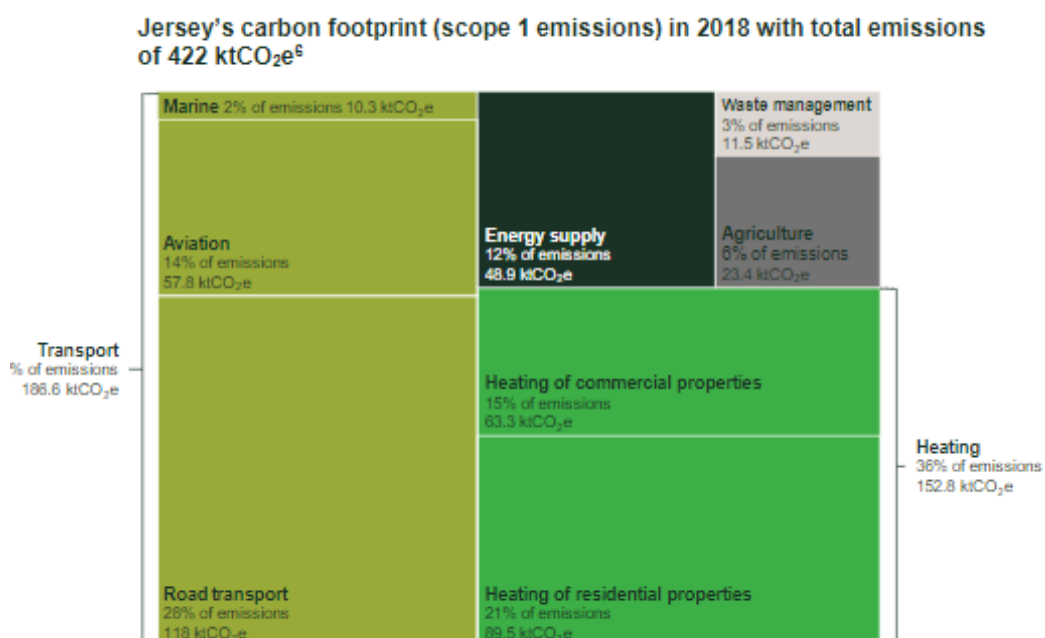
Adoption of alternative energy sources post-2034, may also reduce peak demand and energy requirements, resulting in the funding of a larger than necessary network that would become be under-utilised. This could increase our fixed costs and, ultimately, may lead to higher prices for consumers, with fewer units of power being distributed than planned at the time of the investment. An example of this is if hydrogen becomes the preferred solution for road transport and/or this product is imported.

## Understanding our emissions pathway

### (6.4)

Although as the Roadmap says, ‘*smaller emissions sources include the treatment of solid waste in the Energy from Waste Facility*’, these emissions are currently attributed to electricity production and present opportunity for further decarbonisation within our already virtually decarbonised network. Despite contributing around just 5% of the electricity consumed in Jersey (4.4% 2020-21) EfW emissions inflate the overall carbon content of distributed electricity. In 2020-21 Jersey electricity was calculated at 23g CO<sub>2</sub>e/kWh but 95% of that electricity is from imported nuclear (4g CO<sub>2</sub>e/kWh) and hydro (6gCO<sub>2</sub>e/kWh) power.

Moving the Energy from Waste Facility’s emissions to ‘Waste Management’ as illustrated in Oxera’s report: ‘*An analysis of the advantages and disadvantages of different net-zero targets for Jersey*’, and reflecting the true source of those emissions, or mitigating these emissions with carbon capture prior to its planned replacement in 2038, would decarbonise the network even further, with subsequent overall emissions reductions across all applications, including EVs.



## Understanding our sources of emissions

### Reducing the need to travel (7.6-7.8)

We fully support providing services closer to home as this will make considerably more efficient use of existing electricity infrastructure and the network. We have already seen a shift in demand from commercial to domestic unit sales during the pandemic. Long-term home working could shift the balance of emissions towards domestic, making the case for energy efficiency and electric heating systems even more critical.

### SGRD (7.15)

(See comments on TR3, page 11)

Words: 728

# DRAFT CARBON NEUTRAL ROADMAP

## Jersey Electricity comments 1–

### In summary

Jersey Electricity (JE) welcomes the Draft Carbon Neutral Roadmap that aims to make Jersey net-zero by 2050 and we greatly support the appetite of the Government of Jersey (GoJ) to crystallise policy and shift into action.

We agree with all five principles of the proposed approach but we would, however, urge and support an even earlier target than 2050 which we feel is the minimum commitment that the Island should make: Net-zero by 2050 is simply in line with most other countries and these countries are, in any case, unlikely to want to do business with Jersey, in any meaningful way, without seeing that minimum level of commitment.

We believe, if we work together, Jersey could achieve an even greater ambition for net-zero and this could be a great source of positive differentiation for the Island on the international stage.

### Near-term progress means benefits over longer-term

We feel the next 10 years will be critically important because progress in the near term will greatly determine our trajectory for delivering net-zero over the long term. Although challenging, rapid progress over the next decade will also enable the Island to reap recurring environmental benefits and financial savings from measures implemented earlier.

We understand GoJ's decision not to commit to carbon neutrality by 2030 in the Roadmap and avoid 'locking into' potentially expensive carbon offsets which could deflect funds from urgent and more cost effective on-Island abatement measures. Such local abatement measures, we believe, would have the most impact on Island carbon reduction and their funding would also support the local economy.

### Rapid, on-Island decarbonisation interventions

This approach, however, means it is of paramount importance that Jersey adopts measures to facilitate rapid decarbonisation through on-Island interventions as fast as possible or net-zero will take even longer to achieve. For example, consumers are installing new heating systems and buying new cars with long asset lives today that will cost even more money to switch later. This may lead to early scrapping of assets with remaining useful lives or delays to carbon reduction.

### Fastest and most cost-effective route

Given that electricity in Jersey is already virtually completely decarbonised, we have long maintained that the fastest and most cost-effective route to further reducing Jersey's emissions is therefore by displacing fossil fuels for heating and road transport with low-carbon electricity. Low carbon power is already available to Jersey in almost limitless supplies (in the context of the Island) due to JE's strategy of investing in secure infrastructure and importing a blend of nuclear (4g CO<sub>2</sub>e/kWh) and hydro (6g CO<sub>2</sub>e/kWh) power from the European grid.

Furthermore, this strategy is entirely compatible with the development of large-scale local renewables (such as offshore wind, tidal power and ground based solar PV) as and when they become economically viable – technologies which JE is exploring and investing in.

### Providing a critical early impact on the Roadmap

We believe we are well positioned to facilitate low-carbon electric solutions for heating, cooking and road transport (which together comprise around 70% of Jersey's total carbon



emissions) to provide an early, critical impact on the Roadmap. Many of these technologies when coupled with energy efficiency are readily available today – with Jersey's challenge largely being one of incentivisation (and dis-incentivisation) and delivery.

We are therefore supportive of the policy proposals that encourage this, for example, EV subsidies, grant support for EV charging infrastructure, vehicle scrappage support, an end to petrol and diesel vehicle imports and installation of new fossil fuel boilers, home energy certificates, grants to aid energy conservation and fuel switches.

However, we make the following observations on policy:

1. It is acknowledged in the Roadmap that even delivery of the stated interventions are insufficient in aggregate to meet net-zero by 2050. Although we welcome the funding incentives, we question whether they are sufficient to meet the defined targets. We would therefore support more generous incentives delivered with more pace. Early delivery of the 'low hanging fruit' is very important.
2. We would like to see some measures fine-tuned to avoid unintended consequences. For example, it is very important that financial support for EV chargers is reserved for 'smart' chargers that ensure charging is restricted to off-peak, overnight periods when demand on the grid is low, power is cheaper for the consumer and capacity is plentiful. JE is working on a home charging solution to be launched shortly.
3. While we accept biofuels have a role in 'hard-to-abate' sectors, such as aviation and marine applications (for which there are presently no alternatives), we have serious concerns around their widespread use in applications such as home heating and transportation where, in the vast majority of cases, low-carbon electric solutions are readily available.
4. We believe it is a far better for Islanders to benefit now from investment into energy efficiency coupled with the right long-term, low-carbon solutions rather than deflect funding to subsidising short-term, imported 'transition' fuels the price of which is likely to rise significantly as demand increases. This will syphon funding and economic support away from Jersey and this funding will in any case only have a single-year impact. There is considerable risk that this policy will slow the transition and create a reliance on biofuels with potential supply chain issues that could become costly.
5. We agree with the 'people powered' approach and a 'just transition', both of which will require strong leadership. We agree on the need to involve all stakeholders in joint commitments. No single stakeholder or party has all the solutions or controls the delivery, so there is a need to collaborate for the common good. We believe the GoJ should readily be able to take a long-term view in assessing its own carbon reduction opportunities. The GoJ could lead our community and be a 'force for good' by being an early-adopter of low-carbon technologies for the buildings and transport under its control.
6. We support the appointment of an Energy Minister, the establishment of a Decarbonisation Unit and Carbon Neutral Alliance. But we also believe the Island needs to invest significantly in supply chain development, trade capacity and capability development across the public and private sector to implement measures. This could involve reskilling and redeployment of skills from older into newer technologies and forms part of a 'just transition'. This requires significant policy support and funding.



7. JE believes it can greatly assist in the rapid electrification of Jersey and crucially, do so in a manner that ensures continued delivery of affordable, secure and sustainable energy for our Island. We believe that the grid will provide a critical role in the energy system for many years. Fully leveraging these grid assets, which are entirely compatible with future technologies, will result in more competitive electricity prices for consumers because the greater the volumes of electricity distributed through the network, the more efficient and economical it is to operate.
8. While not wishing to delay implementation of the Roadmap's policies, we would welcome the opportunity to work even more closely with the GoJ, the public and private sector, and the whole community to further develop policy solutions to deliver the minimum of net-zero by 2050.

#### **Policy by policy:**

**Strategic Policy 1: Net Zero Emissions Pathway** – we believe that the target could be and should be even faster than net-zero by 2050 given Jersey's low-carbon electricity system and lack of heavy industry. We believe Jersey could do more and faster. The next 10 years will be critically important.

**Strategic Policy 2: Island Energy Market** – we believe rapid electrification using low-carbon grid power is the fastest and most economic route to net-zero. We believe the use of non-fossil second generation biofuels may have a small role to play in selective 'difficult-to-electrify' transport but in most cases electric solutions are already available and are less costly, less risky and better support the local economy.

**Strategic Policy 3: Financing Strategy** – we agree with hypothecated revenue and that a carbon tax or fuel duty should be considered to discourage emitters of carbon since it is presently 'free to pollute' with carbon and other emissions. Any funds raised from these mechanisms could be invested in low-carbon solutions or into support for the vulnerable.

**Strategic Policy 4: Policy Programme and Development** – we believe that the focus of Jersey's limited resources should be weighted towards measures that deliver the fastest on-Island carbon reduction per unit investment, with measures in place to protect the vulnerable on a means-tested basis.

**Strategy Policy 5: Becoming carbon neutral** – we believe Jersey should develop local sequestration projects that keep funding within the Island. We suggest Jersey analyses i) those activities that can reasonably be abated through local measures that can support the local economy and ii) those that will ultimately require procurement of high-quality carbon offsets or biofuels. Offsets or biofuels should only be procured from high quality, authentic and traceable sources and as a last resort, not first choice.

Words:1,487

# **DRAFT CARBON NEUTRAL ROADMAP**

## **Jersey Electricity comments 4**

### **PART C -Delivery Plan**

#### **Transport policies (TR 1-9)**

##### **Introduction**

With the decarbonised electricity supply that Jersey enjoys, electrifying car ownership could have a dramatic impact on carbon emissions. Today, Jersey has over 100 public EV charging spaces, more per capita than the UK\*. We are ready to invest further in the network to meet increased demand, which we hope will be driven by stronger GoJ policy interventions.

\*Source: [www.zap-map.com/statistics](http://www.zap-map.com/statistics)

##### **Speeding up adoption (TR1)**

EV car registration increased by just 337 between Sept 2020 and Sept 2021, according to DVS figures. Greater funding is needed to incentivise uptake to reach the Roadmap's target of moving 67% of the Island's fleet (c.60,000 vehicles) from fossil fuels by 2030, a rate of 7,500 a year over eight years, so we welcome the incentives set out in the Roadmap.

Firstly however, we feel there is an opportunity to improve DVS registration data gathered which would help make reporting more accurate and meaningful going forward. This would aid JE with infrastructure planning and enable GoJ to report more accurately on progress.

Estimating the number of Plug-in Hybrid EVs (PHEVs) is very difficult because the data comprises a mix of Hybrid EV (HEV) and PHEV vehicles. We suggest improvements in the data captured by DVS should include Petrol, Diesel, Battery EV (BEV), HEV and Plug-in Hybrid EV (PHEV). We would also be supportive of GoJ sharing its modelling of planned growth in plug-in EV take up over the next 10 years.

##### **Incentives**

While we welcome GoJ incentives to encourage EV uptake, we feel the target of 1,606 plug-in EV incentives through to 2025 to be very low. This is equivalent of 401 vehicles a year, c.10% of annual internal combustion (ICE) registrations and far lower than the proportion of new EVs sold in the UK. We also feel that £3,500 may not be sufficient to persuade someone on low income to switch to an electric vehicle. Reducing this incentive over time is likely to deter people from what may already be a difficult purchase decision. We believe greater funding in this area would deliver more significant reductions in transport related carbon emissions and we would support increased Government investment.

We also suggest Jersey adopts the Zero Emissions Capable (ZEC) vehicles definition, as used elsewhere, when considering grants or subsidies.

##### **EV charging infrastructure**

We look forward to working with GoJ to scale up EV charging with more public and private infrastructure. We have already invested £750,000 in providing Jersey with over 100 charging spaces and, early in 2022, we will launch a convenient, subscription-based, home smart charging solution inclusive of overnight off-peak electricity. We would like to see Jersey adopt a similar strategy to England, legally requiring all new homes and buildings to install smart-enabled EV charging points from 2023.

GoJ could help accelerate expansion of the public network (both on street and in car park) and simplify the process for home installations by easing planning constraints and costs. We support the creation of a scheme like that in the UK whereby EV chargers receive 'permitted

development' status, that includes associated signage.

[https://www.planningportal.co.uk/info/200130/common\\_projects/16/electrics/2](https://www.planningportal.co.uk/info/200130/common_projects/16/electrics/2)

To further aid infrastructure planning, it would be useful to continue our close working relationship with GoJ and review:

- Evidence to suggest that on-street EV charging is more desirable than car park charging or destination charging.
- The number of drivers who have/don't have access to off-street charging?

### **Smart charging**

Although we welcome the proposed scheme for 1,031 grants of £350 towards a domestic EV charger between 2022-25 (255 a year), we advise that such grants are available only for 'smart' charging infrastructure that optimises use of off-peak electricity, when there is spare capacity, reducing costs to the consumer and aiding load management.

### **Vehicle scrappage incentive (TR2)**

We would welcome greater clarity from GoJ on how the cost of removing 500 old vehicles from Jersey roads by 2025 at a cost of £500 per vehicle equates to £410,000.

Although we support a scrappage scheme, we believe £500 is, unfortunately, too small to drive the meaningful change needed. For example, Transport for London successfully removed 13,000 of the most polluting vehicles from the capital's roads and expanded its Ultra Low Emission Zone (ULEZ)\* with a much more generous grant scheme\*\* that saw:

- Cars and Motorcycles offered £1k to £2k
- Vans and Minibuses offered £7k to £9.5k
- Heavy Vehicles offered £15k

\*<https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/mayors-ultra-low-emission-zone-london>

\*\*<https://tfl.gov.uk/modes/driving/scrappage-schemes>

### **Supporting transition fuels (TR3)**

We have concerns about the promotion of Second Generation Renewable Diesel (SGRD) where a zero-emission electric alternative is readily available. Firstly, biofuels are still hydrocarbons. They produce CO<sub>2</sub> and other particulate matter when burnt resulting in tailpipe (or boiler flue) pollution that negatively impact air quality and health and still lead to wasted energy (thermal losses). Evidence suggests that SGRD vehicles can emit 10 times more nitrogen oxides than an equivalent petrol vehicle.

Secondly, producing biofuels is extremely inefficient, in some cases using land from cleared forests and that may be better used for food production to feed local communities or used more efficiently for solar arrays to produce electricity.

Thirdly, we think the Island is taking a risk if it subsidises biofuels as demand is likely to greatly outweigh supply over the next few years likely leading to higher prices. If the number of diesel vehicles on Jersey's roads increases, and SGRD is not readily available, drivers will revert to regular diesel with all the associated emissions and air quality issues. This could lead to a reversal in Jersey's emissions profile.

Also, as tighter restrictions are imposed around local air quality and tail pipe emissions, Jersey would need to change course as the UK Government had to do following the diesel emissions reporting scandal that erupted 2014.

We strongly advocate subsidised SGRD be reserved and targeted for 'hard-to-abate' specialist vehicles and plant (medium to HGV vehicles) where no better, cleaner solution is currently available.

We believe Jersey should focus on total emissions elimination (zero) where this is feasible, as in the UK where the Office for Low Emission Vehicles has been renamed the Office for Zero Emission Vehicles. A diesel vehicle, running on HVO would still not be allowed into a clean air zone in the UK without penalty.

To ensure robust reporting, we would like to see GoJ fully evaluate the emissions profiles of all transport fuels and publish declared life-cycle emissions figures for each.

### **Wrong price signals**

Subsidising SGRD for all diesel vehicles, also risks skewing the market and sending it the wrong price signals. The cost of polluting emissions and air quality impacts should be factored into the cost of the polluting energy source. This, in effect, would reduce the delta between SGRD and traditional sources of polluting fossil fuels with a lesser / no subsidy requirement.

Instead of subsidising SGRD, GoJ could consider increasing fossil fuel duty to properly reflect the true full cost of carbon pollution into the cost of the fuel, raising the price of normal fuels to a level closer to or at parity with SGRD/biofuels, which we believe would send the *right* price and environmental signals into the market.

The proposed £2,981,380 in subsidies, we believe, could be split to provide SME with grants for zero-emission commercial vehicles (including vans and taxis) rather than rebate the cost of the fuel which is not ZEC compliant.

### **Vehicle emissions duty incentive (TR4)**

Increasing Vehicle Emissions Duty (VED) on domestic petrol and diesel vehicles each year until 2030 will not prohibit the importation of cheap, ex-UK diesel vehicles. As the UK's equivalent of VED, the Vehicle Tax Rate, goes up, the UK's need to shift diesel vehicles will increase, lowering prices and therefore negating the increased VED charge here. We suggest reviewing the date to 2025, helping to reduce fossil fuel pollution faster.

### **End the importation and registration of petrol and diesel vehicles from 2030 (TR5)**

Although we welcome legislation that prohibits the importation of new petrol and diesel vehicles, we feel 2030 may, unfortunately, be too late to prevent Jersey becoming a dumping ground for cheap, second-hand UK diesel vehicles prior to this date, especially if Jersey promotes and subsidises the wide use of SGRD as proposed in TR3. Jersey needs to be ahead of other jurisdictions on this issue to prevent this happening.

### **Green number plates for electric vehicles (TR7)**

Although the use of green number plates will raise awareness of EVs in Jersey, we feel this needs to be supported by other initiatives such as increased preferential and free parking for EVs. This is a non-cash benefit and could be a useful supplement to purchase grants.

### **Bus service development trials (TR9)**

We recognise there would be value in GoJ supporting Liberty Bus by funding electric buses, operated under licence. This could have a significant impact on emissions. We would be willing to work with GoJ and Liberty bus to develop this initiative further.

Words: 1,488

## Appendix 12.25: Jersey Finance Limited written submissions



### **1. Support for Jersey's pathway to decarbonisation**

Engagement with our members indicates that there is strong support for the overarching objectives of the Carbon Neutral Roadmap (CNR). The reasons for this are multiple:

- **Good global citizenship:** recognising that Jersey has a responsibility, as a developed economy, to take strong and urgent action to address the climate emergency.
- **Enhancing our Island home, building a better future for all:** our industry is made up of nearly 14,000 professionals who call Jersey home. They want to see change at a local level that enhances Jersey's attractiveness and enviable quality of life, preserves our environment, develops our resilience to climate change, and builds a more sustainable future for all. Younger professionals are especially anxious to see strong action to tackle climate change from both Government and employers. If Jersey cannot deliver tangible action that is aligned with those values, it risks losing its attractiveness as a talent hub.
- **Protecting Jersey's reputation:** our success rests in large part on our reputation as a responsible, forward-thinking jurisdiction that plays an active role in deploying global standards and initiatives. Supporting the objectives of the Paris Agreement and the fight against climate change is increasingly seen as an important part of that - with investors, gatekeepers and international partners looking to jurisdictions to demonstrate sustainability credentials.
- **Sustainable Finance on a Sustainable Island:** the CNR supports one of the key critical success factors that underpin our sustainable finance strategy (as outlined above). During the research we carried out to develop that strategy, industry respondents repeatedly emphasised that to be credible as a sustainable finance centre, we must be able to provide evidence that we offer "sustainable finance on a sustainable Island". We expect that the local transition will play a key part in enhancing Jersey's attractiveness as a finance centre.

### **2. A need for ambitious, measurable and costed action plans**

The declaration of a climate emergency by the States Assembly in 2019 sent a strong and welcome signal of Jersey's intentions. We all want to see this translated into urgent action.

In discussions with our members, it was noted that Jersey can and should set ambitious targets for decarbonising. Whilst it is understood that the Paris Agreement lays out certain longer-term pathways and milestones, Jersey's original ambition of carbon neutrality by 2030 (or before) – achieved through sustained reductions in our greenhouse gas emissions, and not just offsets – should set the pace for local action.

Achieving this accelerated timeline requires early clarity but many key aspects of the CNR remain subject to further development. Specific concerns include:

- **The lack of detailed and coordinated policy making in relation to certain policy areas:** Transport is cited as a key example here. With the Sustainable Transport Roadmap still unpublished, and no long-term funding in place for actions such as expanding Jersey's public transport and active travel infrastructure, the CNR appears to allocate a disproportionate importance to decarbonising the vehicle fleet. As employers and businesses, however, our members would like to see much greater clarity on future policies that affect their operations and would (for example) enable their staff to switch their commuting habits. Early clarity on sustainable transport would allow our members to develop resilient work travel plans that keep the objectives of carbon neutrality in reach, by harnessing the collective efforts of an industry that employs a very significant share of the Island's workforce.  
**A significant funding gap inherent in the CNR:** along with significant areas of policy making, many decisions around funding are effectively deferred under the CNR. Indeed, we understand that there is a "funding gap" of around £220m to 2030 which needs to be met if the Paris Agreement targets are to remain within reach. This creates significant risk for Jersey that we will not remain on track to meet our international obligations. It also creates significant uncertainty as regards future revenue raising measures. This is a source of concern for an Island that prides itself on offering fiscal stability. Our members made several suggestions on how to address this funding gap, principally:
  - through access to sustainability-linked debt and private capital, leveraging the role of the local finance sector (as to which, see below); and
  - looking for opportunities for new, hypothecated sources of revenue to fund the objectives of the CNR.
- **A lack of clarity around key milestones and reporting commitments:** Transparency, availability of data and regular reporting on Jersey's decarbonisation journey would provide a great opportunity to engage people achieving broader "buy-in". Moreover, it would allow us to showcase our achievements in the global arena. Our work with international networks such as the International Network of Finance Centres for Sustainability (FC4S), hosted by the UN, has highlighted the need for credible data at a jurisdictional level, associated with KPIs that demonstrate out alignment to international targets.
- **A need for clear collaboration across policy areas:** our members would like to see plans for achieving better coordination between different governmental policy areas, to avoid the risk of contradictory decisions that undermine the effectiveness of the CNR in reducing our emissions.

### 3. Leveraging the finance industry

Our members have highlighted that the success of the CNR will depend in large part on building effective collaborations with the private sector. This is just as true for the finance sector as it is with other parts of the economy.

Building partnerships and “cross-overs” with the finance industry would support the policy objectives of the CNR in a number of areas:

- **Raising sustainable debt:** members generally responded very positively to the idea of a programme of issuance for green/sustainable bonds by the States of Jersey to support the net-zero ambitions set out in the CNR. As well as helping address the issue of the funding gap in the CNR, it provides us with a great opportunity to showcase our local sustainable finance credentials. This is particularly the case if (i) that issuance is carried out using local expertise and services wherever possible and (ii) if it can be open to subscription from local investors (e.g. through a non-institutional tranche).
- **Access to private capital:** as a custodian of over £1.4 trillion in wealth, Jersey’s finance centre has access to finance that could support the local transition. This could involve, for instance, the creation of a fund – seeded by public money and attracting private investment through local private investors (family offices, funds, private wealth structures etc).
- **Driving engagement in the transition:** as employers and businesses, it is vital for the GoJ to take the finance industry along with it on the pathway to net-zero. There was strong support for a Carbon Neutral Alliance to offer access to expertise, resources, training and generally to coordinate the engagement of the private sector. The finance industry would benefit from this type of initiative, but it also has a great deal to offer in terms of sharing the expertise of its members – many of whom are already well advanced in the integration of sustainability into their operating model and business activities.

#### 4. Support for a sustainable finance framework

We recognise that Jersey’s role as a finance centre means that we have a responsibility to leverage our capital expertise for the global transition – noting that, whilst our financial services activities may produce limited emissions at a local level, our ability to shape the deployment of capital globally means that our industry has a vital role to play in supporting the international response to the climate emergency.

In launching *Jersey For Good*, it was clear that many of the levers of success in becoming a sustainable finance centre rest with the policy makers and regulator. That is why we built a governance structure for the strategy, centred on the SteerCo, which brings together all the relevant stakeholders. We remain committed to this structure, which we think provides that best framework for policy development in relation to sustainable finance

Our strategy calls for focus on developing a number of key policy areas that form part of our future enabling environment for sustainable finance in Jersey. With the support of our stakeholders on the SteerCo, and with input from our wider membership, we are already working to develop a series of recommendations around:

- **Enhancing Jersey’s legal, regulatory and supervisory framework for sustainable finance:** adapting to emerging global standards, building on our existing safeguards and removing barriers to scale.



- **Deploying sustainable finance products/services:** creating the right conditions for sustainable finance products such as green bonds, ESG-focussed funds, and development finance.
- **Support for the local transition:** policies that would leverage the finance industry's capabilities in areas such as financing carbon capture.
- **Driving innovation in sustainable finance:** looking at how we can bring together Jersey's complementary clusters (e.g. digital/FinTech) to support innovative products and services for sustainable finance.
- **Incentives and enablers:** creating the right environment for sustainable finance to scale up, through regulatory, fiscal or other levers.

JFL will drive collaboration through the SteerCo on these policy areas, with a view to presenting its preliminary findings to the Financial Services Advisory Board.

[1,497 words]

## Appendix 12.26: Jersey Gas written submissions

For the attention of the Minister of the Environment Deputy John Young  
By email : Climateemergency@gov.je

Dear Minister,

**Overarching response on behalf of Jersey Gas Company Limited to the Draft Carbon Neutral Roadmap Consultation (Additional responses to HT2 x 2 & HT3 have been provided separately.)**

The shift towards a decarbonised economy in the island is undoubtedly one of the biggest challenges the island has faced, and as the company's [REDACTED] I wish to personally assure the Minister that Jersey Gas recognises the role and responsibility it has as an energy provider in supporting the achievement of this goal.

Jersey Gas has been fuelling the island since 1820 when whale oil was used to provide candlelight. Jersey Gas provided coal gas to light the first streetlamps in St Helier. Gas soon became the mainstay for cooking and heating in many parish homes and businesses. In the 1960s a major decision was taken to close the coal plant and to manufacture mains gas from a new safer fuel with a lower carbon footprint - Liquefied Petroleum Gas (LPG). LPG's ability to be used in pipelines, bottles and storage, saw its use across the island, supporting the growth of key economic sectors such as hospitality, agriculture and light commercial. With the Government's plan to encourage diversification of the agricultural sector in Jersey, we are seeing new calls for our business to support this area of economic growth.

In this sense Jersey Gas's agenda is unchanged, we are here to meet the needs of energy consumers today and in the future, adapting our business to meet their changing requirements. Our business is and has always been about providing energy for every generation.

In pledging our support for a decarbonised economy, we support a just transition for all energy consumers. We appreciate that the future strength and resilience of the energy market in Jersey, will be a key factor in successfully decarbonising Jersey. In this context our business is focused on achieving three key things:

- I) reducing carbon emissions as part of a broader commitment to ESG integration across our business
- II) transiting from a gas company to being an energy management company; and
- III) embracing the use and supply of renewable energy.

We believe everyone who uses energy should have the ability to contribute to achieving decarbonisation. We are therefore connecting technology with energy and people, investing heavily in our business to enable islanders to have increased control in their energy utilisation. Reducing energy use is key to reducing carbon emissions.

In the medium and longer term we are working towards offering clean energy, green gas that produces zero emissions. We hope to make the transition for customers as cost effective and easy as possible, by using existing infrastructure where possible. We are opposed to disposing of assets before they reach the end of their useful life, unless absolutely necessary or unavoidable and we recognise that the implications for our business could involve very significant costs if the business became economically unviable.

Similarly, we believe that the energy strategy for the island should seek an integrated solution, uniting stakeholders to ensure there is better use of all our resources and the island's natural assets. We are in favour of alliances and the appointment of a Minister with a portfolio for energy and climate policy.

### **Comments on the draft Carbon Neutral Roadmap**

The roadmap is a long-term plan to achieving net-zero. Jersey Gas is largely in favour of the proposals it contains and has provided separate responses on the heating policies HT2 and HT3.

The roadmap as it stands assumes a significantly higher market penetration of electricity than today, along with the introduction of other forms of clean energy in due course. It anticipates and proposes the replacement of current oil and gas infrastructure early in this process, in order to achieve decarbonisation and hasten the transition. Jersey Gas is fully supportive of the intent behind these measures but does not agree that certain of the measures will have the impact desired.

The proposed constraint on the sale of new oil and gas boilers from the end of 2025, provides insufficient time for Jersey Gas to have a viable alternative to go to market with in 2026 unless such an option is subsidised by Government.

The emission levels of oil and gas are not equal and Jersey Gas reasons the roadmap distinguish between the two fuels. There are also practical challenges to switching out the use of oil and gas. Their use to-date reflects in part an under investment in the island's electricity grid and associated infrastructure. Many consumers in both the domestic and commercial markets cannot rely on electricity to meet their heating, cooling and cooking needs because the load is insufficient.

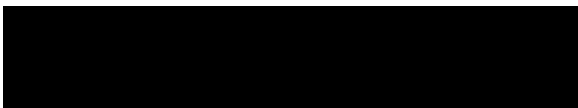
Jersey Electricity has led a campaign in recent years to promote the transition to electric boilers by oil and gas customers. Notwithstanding this the transition rate has not risen to much more than a few hundred each year. Switching approximately 26,000 fossil fuel boilers out at this rate would take decades and very considerable

resources to update the current infrastructure. The cost of supporting such a transition is likely to run into the hundreds of millions. Our view is that investment could be spent better, Government could for example subsidise the introduction of BioLPG fuel a 100% clean fuel to the island at a fraction of that cost.

Transitioning from fossil fuel supplies to renewable energy will place considerable pressures on all providers as infrastructure will have to be removed and replaced, requiring significant physical and financial resources from each. The exception to this is if LPG customers are migrated to BioLPG which could just be swapped in.

If Jersey Gas is unable to provide new boilers to existing or new customers in the domestic or commercial market after 2025, this presents a very real risk to the viability of our business as we will not be able to come to market with an alternative product at that date. Jersey Gas believes that these risks can be avoided or at very least mitigated, if the date restricting the sale of new boilers is pushed forward to 2030. We would also strongly advocate for this more prudent stewardship of our energy customers.

Kind regards,



**Jersey Gas**

**Contact details:**



## **HT2 Update building byelaws(first submission)**

HT2 introduces a proposed constraint on the sale of new oil and gas boilers from the end of 2025. This would have a significant impact on our business this is addressed separately. Critically we believe the policy should be distinguishing between oil and LPG, the latter is one of the cleanest conventional fuels presently available on the island.

### LPG as a transition fuel

LPG is non-toxic, if dispersed it has no impact on soil, water and underground aquifers. It also helps to improve the quality of indoor and outdoor air, as it produces substantially less particulate matter and NOX than diesel, oil, wood or coal. Its use helps to reduce Black Carbon emissions, which are the second biggest contributor of global warming, and which can cause serious health problems. As such there is much research which is promoting LPGs use as a transition fuel which can be used alongside renewable technologies and it is not dependent on weather or daylight, providing uninterrupted, clean and secure energy supply. Critically in Jersey, it can also be supplied to customers wherever they are on island, because of its ability to be used in pipelines, bottling and storage options.

There has been significant research by numerous bodies including the World LPG Association into the role BioLPG, a 100% renewable fuel, in shaping the energy transition to net zero. – BioLPG is identical in appearance, performance and application to conventional LPG and is transported and stored in the same tanks and used for the same applications and equipment or home appliances, making the transition from LPG to BioLPG seamless. When used in a gas boiler, BioLPG can reduce greenhouse gas emissions by 70%-80% in comparison to heating oil. This can be lowered further when consumed in a hybrid heat pump or combined heat and power system, and when further energy efficiency measures are installed. Combusting BioLPG in a boiler produces 90-99% lower concentrations of particulate matter than heating oil, coal and biomass.

The mission behind the development of BioLPG is to reduce carbon emissions and the environmental impact of LPG, which already emits 35% less CO<sub>2</sub> than coal and 12% less than oil. BioLPG fulfils that mission – it emits 73% less CO<sub>2</sub> than conventional LPG. It is not an innovation for the distant future, while it is not commercially available at scale production is being increased and the market upscaled.

We firmly believe that the Government should recognise a role for LPG and in time BioLPG as part of a mix of technologies that can support the decarbonisation of the island. Electrification is not an option currently available to many properties in the island and it is important that regulations and policy reflect that different solutions will be required for different types of building stock and locations across the island.

Energy consultancy Ecuity has undertaken research in the UK and found that a mixed technology approach to installing heating technologies in off-grid homes offers the most cost-effective way for the UK to achieve its Net Zero target. Ultimately concluding it would save the UK economy £7bn.

We believe that a mixed technology approach in Jersey will best accommodate and encourage consumers with different circumstances, earning capacities and building types to make environmentally sustainable choices and in that sense, LPG has a critical role to play.

### Availability of BioLPG

The current issue in respect of introduction BioLPG in the island is the availability of the product. This creates a commercial pricing issue along with the supply issue. The current pricing is c300% of fossil fuel LPG. In the UK a mix approach is being taken already by Calor Gas. As this is a 'drop in' fuel, even at current BioLPG commodity costs, annual Government subsidy of c£7m-£10m would allow for 100% of Jersey's gas to be provided as BioLPG while maintaining the same prices for customers. BioLPG commodity rates will fall as production increases and therefore the requirement for this subsidy would reduce to zero or potentially get the island green and then allow for the transition to other sources to move at a more controlled pace. Current production, without technological advancement is projected to increase 7x by 2030.

### Summary

Jersey Gas objects to the introduction of a constraint on the sale of gas boilers after 2025 on the grounds that this date provides Jersey Gas with insufficient time to come to market with an alternative fuel.

Jersey Gas argues that the policy should distinguish between distinguish between the environmental properties of oil and gas and should recognised the value of LPG as a transition fuel.

Jersey Gas reasons that a mixed technology approach in Jersey would better accommodate and encourage consumers with different circumstances, earning capacities and building types to make environmentally sustainable choices and in that sense LPG has a critical role to play.

Jersey Gas is willing to introduce BioLPG to the island as soon as supplies are available if Government provided an annual subsidy of up to c£7m-£10m to allow for up to 100% of Jersey's gas to be provided as BioLPG, and maintain the same prices for customers.

## **HT2 Update building byelaws (second submission)**

In the absence of an alternative source of fuel being available, the imposition of a cut-off date for the sales of gas boilers will have a very detrimental impact on the business of Jersey Gas and Kosangas and it follows the potential to harm the supply and service we provide to all of our customers. It is important to draw attention specifically to the implication this could have more generally for island.

### Financial impact on Jersey Gas and Kosangas

A boiler should last for at least 10 years, with some lasting longer and some breakdowns or replacements happening earlier. If we assume an average 10-year life and no decline in new boilers in the lead up to 2026 then these businesses will lose 10% of annual revenue each year.

The profit before interest and tax for the businesses is 24% of annual revenue and 35% of gross margin. The operating costs of the business will not decrease as providing supply along with the maintenance and safety of the network and customers will remain. Operating costs could even increase as a consequence of the requirement to maintain aging boilers. The businesses would become unsustainable before the end of the decade. This ignores interest cost, tax and the costs to shut the business down which, with 310km of mains and significant plant assets would run into the multiple millions. These sums would be very significant and would have to be considered carefully in determining the continued operation of the business after 2026.

Kosangas has been notified by its present landlord that the site is to be redeveloped at the end of its lease. Absent an ability to renegotiate this, the business will have to be relocated at an estimated cost of £2 million. The rationale for incurring this expenditure would have to be revisited if the longevity of the business was under question, as it seems unlikely that the business could recoup the costs of this relocation in the time available.

### Operational impact

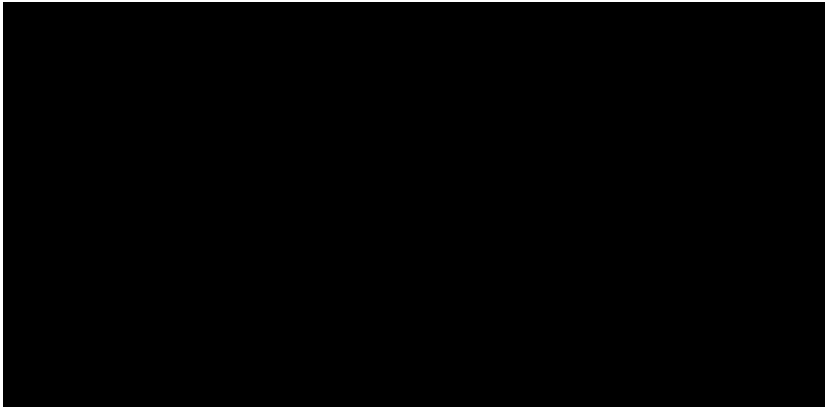
Both Jersey Gas and Kosangas have faced operational challenges in recent years and the uncertainty around the future of the business has led to recruitment challenges and skilled and experienced operatives moving to roles with other organisations. As a result resources for operational activities and deliveries are stretched. If the business sees a further reduction in staff as a result of proposed changes, it will have an immediate impact on the ability to operate the sites safely. This could draw the attention of the HSE. In the absence of another gas operator on the island, we may see individuals relocating to the UK and with that the loss of expertise in the energy sector in the island.

### Impact on customers

Jersey Gas is concerned about the impact this would have on all of its customers and is concerned about the stewardship of their interest. The majority of our customers use LPG supply for dual heating and cooking.



Of the LPG brought into the island last year, 85% was distributed to commercial customers. The top ten commercial customers are:



This list includes several critical island organisations including tourism assets.

our largest commercial customer accounted for 34% of fuel sales last

proposed byelaw is introduced without an alternative fuel source being available, it is likely that each of these organisations will be obliged to change their energy source within the decade. This will be the impact on all of our commercial customers, and it is likely to amount to a very significant cost to each organisation.

For some it may have an impact on their ability to continue operating. This is of whole island concern with the potential to impact key tourist assets. The and

would need to be resolved at a cost to the public purse.

### Considerations

Jersey Gas believes there is a role for LPG to play as a transition fuel and this extension of the window would allow us to transition our business in the longer timeframe. We hope to be able to supply renewable clean energy after 2030 or before if Government will provide a subsidy using the same infrastructure used now (see our submission under HT2).

Jersey Gas contends that an extension to the date for boiler sales to cease by would also have minimal impact on the targets for emission reduction, due to the low emission rate of LPG and its market share.

Jersey Gas has made a commitment to invest in new technology and is keen to offer a carbon neutral fuel supply to customers as soon as it is commercially available. Jersey Gas believes that BioLPG presents a very real option for our customers in the short to medium future, in any event by 2030. Hydrogen is also an option that is being explored but we do not anticipate that hydrogen will be commercially available within the same timeframe. However, hydrogen ready boilers are available now to fit and we have had enquires about fitting commercial hydrogen boilers and from residential clients. The use of hydrogen as a fuel supply will however incur very significant infrastructure costs to the plant, pipelines and more generally across the organisation likely to run into many tens of millions.

### Summary

Jersey Gas would like Government to push the date out for the ceasing of selling gas boilers until 2030 or later, at very least in the case of commercial boilers. We would also strongly advocate for this more prudent stewardship of our energy customers.

Jersey Gas asks if Government is not minded to move the cut-off date, will it at least permit the maintenance of current LPG customers' supply and renewal of their boilers, in order to ensure that they have access to efficient energy technology during the transition phase and/or for as long as the business is able to operate.

Jersey Gas would like to understand if the installation of hydrogen ready boilers after 2026 would meet the installation requirements proposed under HT2? If Government was minded to permit this, it would allow us to supply LPG and in time perhaps BioLPG until an alternative fuel such as hydrogen was a viable fuel for the market. It would also allow us to maintain and grow our current customer base and work with Government towards the goal of decarbonisation in the energy sector.



**Jersey Gas Company Limited**



### **HT3 Energy Performance Certificates (third submission)**

Energy Performance Certificates (EPC) have been used in the UK for some time in order to make properties more energy efficient. Jersey Gas encourages further investment into making homes more energy efficient and encourages a “fabric first” approach that reduces energy use. There are a number of learnings from UK that we would be keen to see addressed in any scheme implemented in Jersey.

#### **Fuel Input Cost as Part of the EPC Calculation:**

The criticism of EPCs in the UK was that the methodology was more likely to encourage property owners to take up higher carbon heating solutions rather than invest in energy efficiency measures. This unintended consequence is due to an EPC rating is positioned as a measure of energy efficiency, when in reality, the rating is actually a measure of energy cost per m<sup>2</sup> which includes input fuel cost. On this basis it distorts the evaluation of similar properties when comparing various fuel types and this is of particular concern in a climate with volatile energy prices.

It means that an identical property, built to the exact same standards, would receive a much lower EPC rating if it is reliant on oil (which has an energy efficiency rating of E on a scale of A to G) or inefficient electric storage heaters (rated E), rather than LPG (rated F) notwithstanding the fact that LPG offers a lower carbon fuel. The scheme does not therefore promote lower carbon solutions such as LPG/BioLPG or heat pumps and in the future could cause problems for properties switching to hydrogen, as it will likely be more expensive when introduced. By simply removing input fuel cost so EPCs are a true measure of a home's energy efficiency, Jersey could avoid a system which encourages the use high-carbon fossil fuels like heating oil, over LPG or heat pumps and instead drive investment in actual energy efficiency and low carbon and transitional fuels.

#### **Policy Implementation and Minimum Standards:**

HT3 explains the purpose of the introduction of the Energy Performance Certificates as follows:

*“Energy Performance Certificates (EPC) are necessary*

*to allow islanders to understand the increasing energy efficiency standards homes they might buy, and other buildings, and*

*to create market incentives to encourage developers to pursue higher energy ratings.*

*Greater uptake of EPCs is also necessary to support better targeting of future decarbonisation policies and investments”*

The policy then states

*“We will develop legislation to make both domestic and commercial Energy Performance Certificates mandatory at the point of sale and rental by 2024 with minimum standards being brought in sequentially from 2026.”*

This is an ambitious timeline with significant preparatory work and resources which will be needed to implement the process. The intended implementation process for the EPC scheme prioritises driving energy efficiency through mandatory market measures which will impact not only the activities of developers, but homeowners, landlords and tenants and anyone else engaged in a property transaction.

It is unclear what the consequences will be of the imposition of “minimal standards”, but the owners of older properties may be most affected due to the fact that the age, style and fabric of the building makes these properties harder to heat and expensive to heat. These properties do not lend themselves to being retrofitted with newer heating technologies such as heat pumps. Historically oil (and to a much lesser extent LPG) has been the fuel choice for owners of these types of property.

The policy makes no reference to what actions will be taken if a property does not meet the minimal standards, and the owner is unable to meet the costs of achieving the mandatory requirements. Given the importance of achieving a just transition for all islanders, what measures will be in place to alleviate any consequent hardship? Will some parties be unable to complete a property transaction as a consequence and is there a risk that buildings may fall into a disrepair or disuse? Policy makers need to take these factors into account, least the EPC scheme has an unintended impact of devaluing these properties as potential homeowners and landlords choose not to invest in them.

In the UK there is no statutory obligation to implement the recommendations of an EPC audit but there is an obligation for the recommendations which may be made to be cost effective. This approach would appear to avoid the risks outlined above and we would be supportive of it being adopted here. It is evident that the way the EPC scheme is delivered will have a considerable bearing on how it is used and ultimately whether measures have the desired and intended impact.

### Subsidies

During the voluntary period of the scheme, it is proposed to offer £285,000 in the form of subsidies to encourage the take up of EPC evaluations. We suggest this money might be better spent during this period in the form of grants supporting the completion of any recommended works to the fabric of a home, such as improved home insulation, secondary glazing, thermostatic controls etc at least in this way during this voluntary period of the scheme the subsidy would act as incentive to undertake an EPC evaluation and benefit from the subsidised implementation of such recommendations.

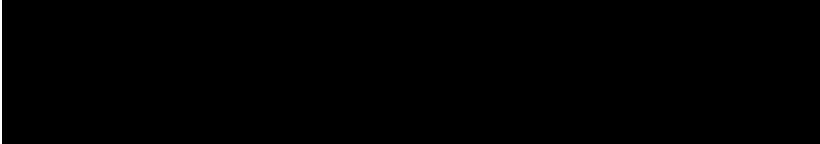
### Summary

Jersey Gas encourages further investment into making homes more energy efficient and encourages a “fabric first” approach that reduces energy use

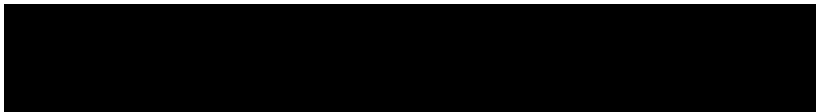
Jersey Gas recommends removing input fuel cost so EPCs are a true measure of a home’s energy efficiency and therefore drive investment in actual energy efficiency and low carbon and transitional fuels.

Jersey Gas recommends that there is no statutory obligation to implement the recommendations of an EPC audit but there is an obligation for the recommendations which may be made to be cost effective.

Jersey Gas recommends any subsidies are spent on grants to directly improve building energy efficiency.



**Jersey Gas Company Limited**



## Appendix 12.27: Jersey Landlords Association written submission



**BY EMAIL TO:** [climateemergency@gov.je](mailto:climateemergency@gov.je)

31 January 2022

Dear Minister

### **CARBON NEUTRAL ROADMAP (THE “ROADMAP”) – PUBLIC CONSULTATION**

The Jersey Landlords’ Association (the “JLA”) is an organisation which represents the interests of residential landlords in Jersey. We have over 200 members, which comprise landlords and letting agents responsible for the provision of over 3,900 residential units of accommodation (including private rented accommodation and lodging houses).

We have reviewed the Roadmap and would make the following comments.

1. The JLA is supportive of the aims of the Roadmap and feels that landlords should play as much of a part as owner/occupiers and tenants in addressing climate change. By way of example, the JLA recently invited a local architect and historic buildings expert to address our members on the topic of ‘Energy Efficiency Measures in Older & Traditional Buildings’.
2. Our comments focus on the heating policies set out in the Roadmap (HT1 to HT3).

#### **Policy HT1**

1. We warmly welcome the provision of a subsidy enabling householders and commercial businesses to transition to low-carbon heating systems. We understand that private residential landlords are included in this subsidy. We disagree however with a proposed cap on the number of multiple properties that a landlord can receive grant funding for. If a subsidy is available for one rented dwelling, it should be available for all of them (as long as the work on the dwelling is completed satisfactorily), particularly if the intention is to encourage all landlords to become compliant.
2. Any effort to encourage landlords or owner/occupiers to decarbonise heating systems must go hand in hand with an effort to encourage landlords or owner/occupiers to improve insulation in their properties (and we are glad to note that the policy makes mention of home insulation). Our members have reported being advised that changing a heating system to a more efficient type will not work if the highest standards of insulation are not present in a property and, in fact tenants will be generally colder in a building which has poor thermal performance and energy efficient heating than if they had fossil fuels. This is a significant factor holding back landlords from changing a system to a more efficient one. Subsidies must be made available (as they are in the UK) to encourage landlords and owner/occupiers to upgrade insulation (in an appropriate way) as well as heating systems.
3. We note that the proposed subsidies will run until 2025. We would welcome a commitment from Government that (notwithstanding the fact that the current Government plan only runs until 2025 and the imminent election) every effort will be

used to maintain or improve on such subsidies following 2025 (especially given the tight timescales being worked to).

4. We note that the cost of undertaking any repair, maintenance and building work has increased very substantially in Jersey over the last 3 to 4 years for many reasons (including, for example, Brexit, Covid and the availability of trained tradesmen on-Island). We would hope that Government takes this into account in setting the levels of such subsidies.

## **Policy H2**

1. There is a lack of clarity as to what setting *“increased energy efficiency and carbon emission standards of new and existing domestic and commercial buildings”* will mean for existing buildings.
2. Many of our members own older properties and many of these are listed properties. Jersey has many such properties and we would submit that very few of these meet modern energy efficient standards completely. Whilst the Roadmap seems to account for the fact that there will be “hard to treat” properties, it is unclear what changes to building bye-laws will mean for such older properties.
3. Whilst it will be relatively easy to include energy efficient measures in newbuild properties, retrofitting older (and particularly listed) buildings with such measures is acknowledged to be a much more difficult prospect and thought should be given to whether to include additional subsidies for the retrofitting of older/listed buildings.
4. In particular, requiring older or listed buildings to improve energy efficiency measures on the change of a tenant (rather than on a renovation or a sale) will be prohibitively costly for landlords and even if government were to heavily subsidise such work, the implementation of such a scheme by the end of 2024 will give landlords (and builders) very little time to implement such improvements.
5. Many Jersey rental properties will have a change in tenant at least every 5 years with many occurring more frequently and some occurring every year or so. It is wildly optimistic, given the extreme lack of capacity in the Island’s building industry at the moment and probably for some time to come (a key assumption of this policy), to assume that required improvement works will be possible within such a timescale across all of Jersey’s c. 20,000 rented dwellings.
6. If this policy were to be coupled with sanctions or the removal of the ability of a landlord to let a non-compliant property, this would exacerbate Jersey’s housing crisis significantly. It would be far more appropriate to provide that such works should be completed by the time of a sale, during a major renovation or by a deadline (say 2030) in order to give Jersey’s landlords (and owner/occupiers) and builders the time to comply.
7. Thought must also be given to whether it is environmentally friendly to require a property owner to replace a heating system with a more energy efficient one if the old system has not come to the end of its useful life.



8. Care must be taken to ensure that the treatment of older and listed buildings in the bye-laws dovetails with the treatment of such buildings in the planning laws and the Historic Environment Team's treatment of applications to improve energy efficiency measures, so that the planning and listed building processes facilitate the aims of the Roadmap.

### **Policy HT3**

1. We would appreciate a better understanding of how it is intended that EPCs will be implemented for rental properties. The introduction of minimum standards is also unclear. What will such minimum standards entail for the private rental sector? If such minimum standards are compulsory and will require substantial works to properties, then this policy may also be at the mercy of the timing issues mentioned in relation to HT2 above
2. We welcome the provision of subsidies of £250 for home audits (which we assume will cover rented dwellings too). However, we would suggest that undertaking 250 home energy audits per year until the end of 2024 significantly underestimates how many rented dwellings will need to be audited.
3. The capacity to undertake audits will need to increase by a factor of 25 in order that all c.20,000 rented dwellings can be audited before this date, if rented dwelling were to require an EPC from the start of 2025.
4. We would welcome commitments from Government that:
  - a. EPC subsidies will be made available for every property (whether a rented dwelling or an owner/occupied dwelling) in Jersey that will need an EPC by the end of 2024; and
  - b. the capacity to undertake home energy audits will be increased significantly enough to allow all rented dwellings to be audited by the end of 2024.

Please do not hesitate to contact us if you require further input in relation to these or other issues. In particular, we would welcome the opportunity to consult further on each of these policies and how they are intended to work in practice.

Thank you for the opportunity to communicate our and our members' view to you.

Yours sincerely

**The Committee**  
**Jersey Landlords' Association**

## **Appendix 12.28: Jersey Milk Marketing Board written submission To the Minister of the Environment:**

### ***An overarching submission:***

#### **Jersey Milk Marketing Board response to the draft Carbon Neutral Roadmap:**

The Jersey Milk Marketing Board (JMMB) is a Co-operative representing the 13 dairy farmers in the Island who exclusively supply Jersey Dairy with 13.5 million litres of milk annually. Jersey Dairy, which is wholly owned by the JMMB, processes two thirds of the milk intake into a wide range of milks and branded dairy products for the local market, thereby contributing to local food security and lower food miles; the remaining one third of milk supply is processed into bespoke added value branded dairy products, which are exported to the UK and to specialist retailers in the Far East.

Whilst Agriculture is estimated to contribute between just 4 – 6% of carbon emissions in the Island, the JMMB is determined to play its part as a driver of positive change within the Island's Carbon Neutral Strategy, and it wishes to develop a specific plan within the Rural Economy Strategy (RES) to achieve this, in line with the objectives and targets set in the draft Carbon Neutral Roadmap (dCNR).

The Board fully recognises that it is dealing with some very complex natural processes, not least that methane is the predominant greenhouse gas (GHG) emitted from livestock enterprises. Reducing dairy sector emissions is not just an objective of Government, crucial as it is, but it also provides an opportunity for Jersey Dairy to enhance the marketing of its bespoke dairy products in order to derive further added value, not just for the citizens of our Island but also our customers in the UK and the Far East.

To achieve this requires some careful and accurate assessment of emissions at the time of the 1990 baseline and where they stand now in 2020, so that progress can be creditably monitored as improvements are instigated. The Board is disappointed at the evaluations that have been made by Aether, who were commissioned by Govt to compile the Greenhouse Gas Inventory for the Island, in that estimations for agriculture included 'crop burning' and the use of 'urea fertiliser', neither of which have been part of the best agriculture practice that the Jersey agricultural industry aspires to and delivers whenever possible. This is symptomatic of the incredibly wide range of commercial organisations who offer GHG monitoring from a 'generic desktop perspective', and unless accurate and verified information is submitted at the outset, e.g., up to date cattle population statistics, then outcomes will be distorted.

It is not as if the Board is making a standing start to enhance its sustainability credentials: as the first Dairy in the UK to comply with LEAF Marque standards three years ago, the Board has actively developed initiatives to improve both our environmental footprint and our biodiversity status within the Board's Dairy Environmental Enhancement Plan (DEEP), which includes, amongst many other initiatives, our annual Big Farmland Bird Count which will take place in three weeks' time.

In order to devise a sound long term strategy which meets the JMMB/JD's and Government's objectives, the Board believes that the following actions are key: -

- Agree joint key objectives

- Assess accurate GHG emissions from the agricultural industry in Jersey in 1990 and currently
- Identify a credible and bespoke GHG emission evaluation company to:
  - Monitor progress on our dairy farms
  - Monitor progress at Jersey Dairy, and throughout the dairy supply chain
  - Provide advice to the above, in relation to achieving agreed objectives
  - Provide valid information to Govt, Jersey citizens, and overseas customers
- Compile a programme of research and development, specifically related to the requirements of Jersey's Dairy Industry, focussing on the mitigation of methane and nitrous oxide emissions, improving soil fertility and carbon sequestration, objectively evaluating our positive contribution to Island biodiversity, optimising energy sources at Jersey Dairy, whilst utilising the best scientific advice available
- Evaluate the importance of maintaining good agricultural land for quality, branded, local food production, as well as carbon sequestration, in the Island, and prevent its loss to alternative use
- Recognise the importance of the continued use of red diesel for the efficient and reliable operation of our tractors
- Promotion of progress in all areas of the strategy
- Agree additional funding required, within the new Rural Economy Strategy
- Ultimately, enhance the core identity of our pedigree Jersey Cow in her Island Home

The Board has actively made significant progress with a number of the above action points described above, which coincide with the publication of the dCNR and the imminent revision of the RES, which it hopes exemplifies our commitment to 'be a driver of positive change'. The journey to 'net zero' in our Island is a long one, especially in political terms, and it cannot afford to be 'hijacked' at any stage, which is why the Board places such importance on the creation of a valid long-term strategy in conjunction with Government at the outset, at which agreed positive outcomes attract appropriate funding rewards.

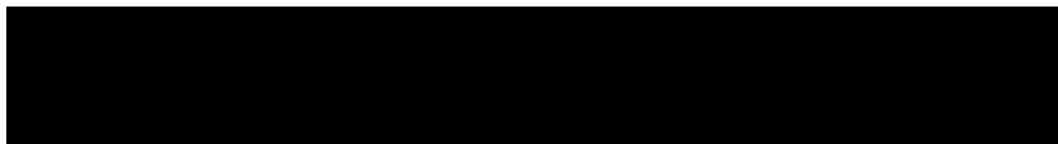
In broader terms, the Board accepts that the dCNR is a comprehensive policy document of perhaps the highest strategic importance for our Island, giving all of us the opportunity to define and articulate our unique and established natural attributes in a coherent and objective manner. Too often the concept of climate change is distilled down to simplistic and generic outcomes, expressed in antagonistic terms. In an Island where compliance pervades every aspect of our economy, we must not submit to 'the binary tick boxing exercise' which creates a competitive and divisive environment; rather, we are dealing with worldwide natural forces in which the Island, as a whole, has the opportunity to promote its natural credentials to a global audience.

31<sup>st</sup> January 2022

Word count: 995



## **JERSEY MOTOR TRADES FEDERATION**



Dear Minister for the Environment,

This document lays out the JMTF's views following an initial general discussion on the Government's evident policy about achieving the targets set by debate and agreement of the States assembly.

### **General**

Concerns were expressed that, even in the longer term (i.e. 2030 to 2050) the assumptions accompanying each category are often either hopelessly optimistic or delusional.

The assumption is made that the Jersey Mobility Hierarchy (as set out in the still awaited Sustainable Transport Policy) seeks to encourage many to switch journeys to public transport/active travel (e.g. cycling), but until the STP is published, it is impossible to assess just how the Government will achieve this and how far a new Government will also embrace this policy.

### **TR1 – Speeding up the adoption of electric vehicles**

While the JMT Council welcomes the acceptance by Government that incentives (such as those adopted by the UK) were helpful, little thought appears to have been given how these incentives will work. Given the current prices of electric vehicles that, the limit is capped is seen as being too low, presumably based on the assumption that the cost of electric vehicles will drop significantly and parity between electric and fossil-fuelled vehicles will have been achieved by 2026.

There is little evidence of this. The purchase price cap of £30,000 is too low as even a small, modest Fiat 500 EV costs more than £30,000. We would suggest a price cap of at least £40,000 for cars and £50,000 for commercial vehicles. We suggest that much more thought be given to how any incentive will work.

The Consultation Draft dictates that for every EV subsidy, a fossil-fuelled car must be removed from the road. How is this going to work? Many part-exchange vehicles are likely to be of a significant value and not ready to be scrapped. In due course, these part-exchanged vehicles are likely to be purchased by owners of older polluting vehicles who may well scrap their current cars.

Customers will not want to buy an EV until the scheme is launched, and the trade will not import any prior to launch, so there will be a period when no EVs will be sold, and following the launch, it will take time for dealers to source EVs for stock. It is imperative that the grant can be claimed for stock-in-trade cars so we can hit the ground running. It would also make sense to allow retrospective claims at launch to maintain/increase EV purchases in the preceding months.

Although the Government expects price parity by 2026, we believe that if this happens, it will be achieved by the price of fossil-fuelled cars rising to match EV prices which will not come down substantially as some people choose to believe. If anything, the cost of EVs will continue to increase as many manufacturers are currently subsidising their prices to achieve CAFÉ targets.

We welcome the charger subsidy of £350. However, we are very aware that many households, especially apartment blocks, will not have the ability to install charging points to achieve the volume of EVs required in the Draft.

## **TR2 – Vehicle scrappage incentive**

The DVSD estimates that some 30,000 vehicles are more than ten years old, and with the likelihood of mandatory vehicle testing being introduced, the number of elderly vehicles likely to be scrapped will increase. Whether the scrappage incentive of £500 (even with another incentive) is expected to induce an owner of an old vehicle to scrap it and buy a new or used electric vehicle is very much open to question given that the prices of used EVs are still high.

While we welcome the £500 scrappage voucher scheme, the mechanism to control this scheme must ensure that people are not scrapping an old car that will be scrapped naturally while continuing to drive a fossil-fuelled car not registered in their name.

The budget of £410,000 less £500 x 500 cars scrapped (£250,000) leaves £160,000, which we are told is for marketing and administration. Is spending almost 40 per cent of the budget on this a prudent use of resources?

## **TR3 – Supporting transition fuels**

We welcome the 32p per litre subsidy on Second Generation Renewable Diesel (SGRD), although we feel it should be implemented immediately rather than in 2023 and should be raised to actually make SGRD cheaper than conventional diesel.

Given that the price of SGRD is currently 36 per cent more than standard road diesel, the proposed subsidy of 32p is likely to be a very ineffective incentive. Any such incentive is only likely to be successful if it brings the price of SGRD below that of regular diesel. Currently, the impôt duty of road diesel is 56.5p per litre, and many States members will recall that, some years ago, when the States itself was eager for motorists to switch to diesel from petrol, a significant reduction on price was achieved by cutting the duty on diesel to bring the retail price well below that of petrol.

Carbon reduction systems are efficient and such systems reduce carbon emissions by up to 80 per cent. A Government subsidy for such systems would be both effective and improve fuel efficiency, thus reducing consumption.

#### **TR4 – Vehicle Emissions Duty (VED)**

The proposal that electric vehicles should continue to be exempt from VED is hardly surprising. There is an inevitability that the Government will continue to see VED as a valuable revenue source and that it will continue to increase the rates; therefore is no surprise. The degree to which increased rates of VED is a disincentive is open to question.

#### **TR5 – End of the importation and registration of petrol and diesel vehicles that are new to the Island from 2030**

The JMTF recognises and understands the intent by the States to reduce carbon emissions and consequently the decision by the Assembly to cease the importation and registration of new and pre-registered petrol and diesel vehicles from 2030. However, the importation of hybrid cars must still be permitted until at least 2035, and 2040 would be preferable, as these vehicles still offer a much better alternative to full fossil-fuelled cars.

However, the assumptions made in the document are incredible. Within three years, 34 per cent of vehicles on the Island will be EVs is unrealistic and is unlikely to be achieved even by 2030. The DVSD confirmed that they had 127,661 vehicles on their register at the end of 2021, of which just 1,365 were EVs. To achieve a figure of 34 per cent of registrations by 2025, 42,039 EVs will have to be imported (equating to more than 14,000 per year) at the same time as dealers will still be legitimately importing new fossil-fuelled vehicles.

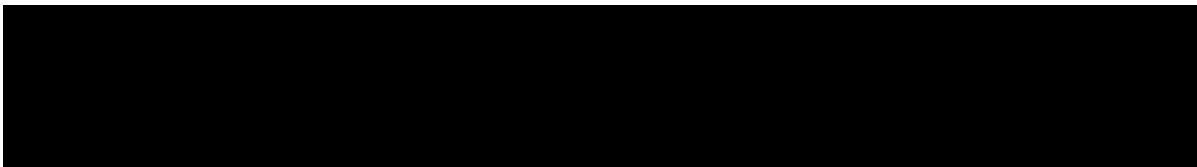
Below is a table of new and used (pre-registered) vehicles imported for the last five years, which shows an average of 6,031 per annum. We have no idea how this is going to increase to more than 14,000 per annum. Even if this figure was achievable, we do not believe that the manufacturers will be in a position to supply this number of EV vehicles.

	2017	2018	2019	2020	2021	Average PA
New Vehicle Registrations	4364	3942	3451	2658	2627	3408
Used vehicle Registrations	2786	2728	2644	2261	2694	2623
<b>TOTAL Vehicle Registrations</b>	<b>7150</b>	<b>6670</b>	<b>6095</b>	<b>4919</b>	<b>5321</b>	<b>6031</b>

*Figures supplied by the DVSD*

In summary, the JMTF Council accepts the inevitability of a significant (but unspectacular) growth in the number of electric vehicles and is gearing itself to cater for the sale of such vehicles and the service and support requirements in terms of staff skills and infrastructure they will demand. However, it must view the objectives, assumptions and dependencies contained in the relevant sections of the Consultation Draft as being seriously flawed.

We must place on record that at the beginning of 2020 we were given a firm undertaking by the Infrastructure Minister in person that this Federation, representing as it does the significant proportion of motor traders, particularly franchise holders for new vehicles, would be consulted in depth in compliance with its standing as a 'major stakeholder'. Such consultation has never taken place, and while we accept that the advent of the coronavirus has impeded many deliberations, we are extremely disappointed to note that the views of a number of organisations whose interest is either peripheral or factional have been duly noted. However, no further involvement has been invited from the trade body whose contribution to the Island's economy is considerable and on whose viability many hundreds of local people, highly skilled and otherwise, rely for their livelihood and wellbeing. It is pretty clear that had such consultation taken place, many of the highly speculative and quite unrealistic SMART objectives, assumptions and dependencies contained in the Consultation Draft would have been avoided or radically changed.



On behalf of the Council of the Jersey Motor Trades Federation

Word count 1500





Appendix 12.30: Jersey Youth Parliament written submissions

## **JERSEY CARBON NEUTRAL ROADMAP CONSULTATION RESPONSE 2022**

### **ENABLING POLICIES**

#### **For the attention of the Minister for the Environment**

The Jersey Youth Parliament believe that the Carbon Neutral Roadmap is excellent and will be incredibly significant in aiding our transition to become a sustainable island, however there are alterations in some areas which we would suggest to make it even more effective. We will go through each of the policies in order, detailing our comments.

The JYP also consulted other young people through a survey. 139 young people from 11 different educational institutions participated.

They rated the government's response to the climate emergency at a meager 4.27 out of 10. Of the 97 who gave further comments, 21 felt that not enough was being done, another 20 had no knowledge of what is being done, and 17 felt that faster action is required to address the carbon emergency.

The participants recognised the importance of awareness and education on issues surrounding carbon emissions and the environment.



## QUOTES FROM JYP SURVEY PARTICIPANTS

*"The governments actions are only small steps and we need to walk a marathon to resolve the climate crisis...the government can make laws and create awareness to the situation. Some people not taking action need to be encouraged by the government...We might not have the money for this but we got into the situation and so we have to resolve it."*

*"I don't know that much about it, which says something in itself"*

*"...This government has focused on the financial sector more than anything else, while they could be making legislative efforts to reduce climate change on the island."*

*"The government are doing good but they could spread more awareness and tell people what they could do to help."*

*"I understand the government are doing something, but I don't think the public are as informed as they should be. They say they are doing these things but I wish they are able to show us results on what their changes are making"*

*"There could be shorter deadlines"*

*"I don't know what the climate response is from Government"*

EN1

We feel that this policy is very important, as it will set a good example for decarbonisation and build the framework for more changes to come. We hope that this is carefully focused upon and brought about in order to boost our transition to carbon neutrality.

EN2

We believe that creating a Carbon Neutral Alliance will be a huge step forwards in making our Island more sustainable, as we feel that the only way to succeed is by working together and focusing on unity. This scheme will provide an opportunity to share knowledge and ideas, and ultimately create links in our community which will be essential in moving forwards.

EN3

We fully support this policy as we understand the importance of improving the skills available to aid decarbonisation, as without sufficient training, we will not be able to fulfil all the policies outlined. So we therefore believe that emphasis should be placed on this initiative, as it is one that will be imperative in ensuring Jersey's future.

EN4

We feel very strongly that good quality education on the environment within schools is something that is essential in order to build a sustainable community, in which everyone understands and cares about climate related issues. This is the only way we will truly be able to succeed, as we need to change the general mindset towards climate change and our role in solving it.

EN5

We feel that this policy is particularly important, as it is crucial that we preserve and protect our natural environment, in order to enable the creatures that live in it to thrive. Loss of biodiversity is a huge problem, so we hope that this will also be improved through the actions of this policy. We feel that establishing Jersey as a centre of excellence for blue carbon sequestration will be a significant step forwards in making Jersey an Island that enables nature to flourish.

EN6

As a group, we understand that at the moment, carbon offsets will need to be involved in reaching a carbon neutral status, however we hope that more focus will be placed on direct actions to reduce emissions, therefore decreasing the amount of offsets that will need to be purchased. This is because we feel that it is important to do as much as we can to reduce our emissions before turning to other methods. Indeed, we hope that in the future, the need for carbon offsetting will be completely eliminated.

## **Conclusion from the Jersey Youth Parliament**

In conclusion, we as the Youth Parliament of Jersey believe that the policies will go a long way towards reaching our goals, and we have no new policies to suggest (except for the pedestrianisation of town), however a large number of the policies need to be more ambitious.

In this climate crisis, we need to do everything we can. These policies are good and great steps to take, but they aren't quite there yet.

*Word Count: 812*



## **JERSEY CARBON NEUTRAL ROADMAP CONSULTATION RESPONSE 2022**

### **HEATING POLICIES**

### **ON & OFF ISLAND POLICIES**

#### **For the attention of the Minister for the Environment**

The Jersey Youth Parliament believe that the Carbon Neutral Roadmap is excellent and will be incredibly significant in aiding our transition to become a sustainable island, however there are alterations in some areas which we would suggest to make it even more effective. We will go through each of the policies in order, detailing our comments.

The consulted young people from 11 across the island through a survey. When asked 'What do you think the first priorities should be for Jersey for combating climate change?' many acknowledged that all actions were equally important. The top 3 were 'reducing transport emissions' (51 out of 139), 'More renewable energy sources' (42 out of 139) and 'More recycling' (21 out of 139).

When asked how important the environment is to young people it scored 8.32 out of 10, showing how concerned today's youth are about the climate crisis.

## QUOTES FROM JYP SURVEY PARTICIPANTS

*"Renewable energy should be accessible to all, no matter your financial situation, currently it seems that it is only available to those in good financial positions, meaning those who aren't, then have the guilt of knowing their contributing to climate change without there being much they can do as they cannot afford any alternatives"*

*"The government should make it (the environment) their main priority (after Covid)"*

*"It is important that we approach things systematically, however we shouldn't drag the process out for too long. This is a global emergency. I think we should approach as many aspects as we can bit by bit"*

*"The government are doing good but they could spread more awareness and tell people what they could do to help."*

*"...they could install solar panels on any governmental buildings and homes instead and instead of relying on fuel for the everyday jersey people in a few years to plan ahead find a good quality..."*

*"Hold businesses accountable of their waste"*

*"More action needs to be taken"*

## HT1

We feel that incentives to encourage people to move towards low-carbon heating systems is a necessary step in reducing heating emissions, as it will enable more people to maintain a sustainable household. This could perhaps be extended to cover the cost of more systems, in order to increase the impact of the policy, as many islanders may still struggle to afford to implement more sustainable methods of heating.

## HT2

We feel that it is crucial to ensure that building standards are updated to reflect the importance of sustainability in construction and renovation. Minimum energy standards will mean that Jersey as an island would become far more environmentally friendly and in addition to this it would give islanders the opportunity to live in energy-efficient housing, which would be hugely beneficial.

## HT3

We strongly support the implementation of Energy Performance Certificates, as it will create momentum in increasing the sustainability standards of buildings in the Island, and will improve the living standards of islanders as they will be able to understand the advantages and disadvantages of the housing available to them.

## OE1

We believe that increasing awareness of off-island emissions is crucial as this is an area which needs to be tackled in order to truly become carbon neutral, as clearly, being an island means that we are reliant on outside sources. It is essential that islanders are educated on the effects of their choices, and how they can make changes in order to reduce their impact on the environment.

## OE2

We feel that it is important to focus on emissions within construction, as this could have a real effect on reducing environmental impact. We believe that it is important to focus on innovation within this sector, as modern methods could make a real difference in reducing emissions produced. We also feel that upskilling will be essential in our journey towards carbon neutrality, as it will enable us to move forwards with the capability to become more sustainable.

## OE3

Reducing emissions within agriculture is extremely important, as it is a key industry within the Island, so we feel that we need to meet targets in order to increase sustainability whilst preserving such an important aspect of our island community.



#### OE4

Ensuring that waste management is sustainable is critical in becoming carbon neutral, so we feel that, as suggested, we should aim for a date even earlier than 2038, in order to remain on target. We strongly agree that there should be a focus on the hierarchy of reduce, reuse, recycle, as this will enable us to tackle the source of our problems directly.

#### OE5

We feel that it is important to limit the production of F-gases, due to the huge effect that they can have on the environment, therefore we agree with the proposal to ensure that this is focused on and reduced in accordance with International agreements.

#### OE6

This is a policy that we feel particularly passionately about, as since finance is such an important industry in the Island, it is essential that sustainability is ensured, as it has a large-scale impact. We feel that it is crucial to deliver a sustainable finance framework, as it could indeed have effects on a global scale, and will establish Jersey as a leader in innovation within finance.

*Word Count: 868*



# **JERSEY CARBON NEUTRAL ROADMAP CONSULTATION RESPONSE 2022**

## **TRANSPORT POLICIES**

### **For the attention of the Minister for the Environment**

The Jersey Youth Parliament believe that the Carbon Neutral Roadmap is excellent and will be incredibly significant in aiding our transition to become a sustainable island, however there are alterations in some areas which we would suggest to make it even more effective. We will go through each of the policies in order, detailing our comments.

Word Count: 1440



## **For the attention of the Minister for the Environment**

Many of these policies will need public awareness, meaning that more outreach is needed.

139 young people, aged 13 to 18 from 11 different schools, participated in a recent JYP survey. They were asked to share their thoughts and opinions about the local environment and the climate emergency.

They rated the government's response to the climate emergency at a meager 4.27 out of 10. Of the 97 who gave further comments, 21 felt that not enough was being done, another 20 had no knowledge of what is being done, and 17 felt that faster action is required to address the carbon emergency.

Survey participants were asked 'What do you think the first priorities should be for Jersey for combating climate change?'

The top 3 were 'reducing transport emissions' (51 out of 139), 'More renewable energy sources' (42 out of 139) and 'More recycling' (21 out of 139).

Many others said **all of the above were important**. However 89 participants wanted more recycling in school and plastic free initiatives. When asked how important the environment is to young people it scored 8.32 out of 10, showing how concerned today's youth are about the climate crisis.

## QUOTES FROM JYP SURVEY PARTICIPANTS

*"We are making progress but I don't feel like we're making it fast enough. We need to start implementing things quicker and adding more pressure to get things done."*

*"2050 is not soon enough."*

*"Cars are the obvious issue in Jersey and it is something that is important to tackle now, especially since transport emissions are some of the most numerous in Jersey."*

*"It is important that we approach things systematically, however we shouldn't drag the process out for too long. This is a global emergency. I think we should approach as many aspects as we can bit by bit"*

*"There are more cars than people on Jersey - which is completely ridiculous, given it's size. A limit of the amount of cars per household, as they have in territories such as Bermuda, would be a great solution - reducing the islands climate footprint while also limiting traffic on the islands congested roads."*

*"Creating more public transport infrastructure i.e. trams, trolley buses and alternative fuel buses so that cars aren't needed to get around thereby reducing overall transport emissions"*

TR1

We believe that speeding up the adoption of electric vehicles (EVs) is incredibly important, so we feel that these policies need to be ambitious. We believe that the number of electric vehicles being subsidised should be increased, and that the incentive should be capped at £3.5k as proposed but that it should apply to electric vehicles even above £30k. This is because the majority of EVs are currently above that limit. Only going through to 2027 doesn't seem long enough: if you expect the price parity between EVs and non-EVs at that date then you still need to subsidise after it to create a financial incentive.

TR2

This is important, and £500 is good, but we need to ensure that the vehicles are scrapped efficiently (if possible, recycling should be employed so that materials are not wasted) and that this can apply to as many heavily polluting vehicles as possible.

TR3

It is crucial that we encourage the use of less damaging fuels as part of the change to EVs (electric vehicles), as it will help the switch to be completed by providing more environmentally-friendly alternatives. This policy will help a lot with this issue. Public awareness of this policy is necessary: many people won't know what SGRD stands for.

#### TR4

Imposing financial incentives to make the switch (to EVs) is a key part of greener road travel, and this policy will provide part of that incentive. It does need to be ensured that it is enough to make a difference but not so much that it will overly impact less well-off islanders. Paired with the subsidy for EVs, this step will make that crucial financial incentive stronger.

#### TR5

This step is one of the most important steps to cut down on transport emissions. If there are no fossil fueled vehicles coming in, and there are those types of vehicles going out, we will be making the switch. This needs to be implemented, and probably sooner. Our recommendation is to bring it forward to 2027, when it is assumed that price parity will be achieved.

#### TR6

It is good that the laws about road travel are continuing to march forward into the future, but it is also important that the driving mentality is changed in regards to bikes and other alternative methods of travel. The law is not the only problem - dangerous drivers and their attitudes to bikes and other methods of transport also need to be changed. The law could also be changed to give greater priority to buses over cars, in conjunction with the great changes to the highway code to come into force soon.

TR7

A visible sign of the green switch is necessary, so that it becomes of social importance. The green number plates need to be very different to the normal number plates, so they stand out, as well as being sustainably sourced (or at the least as sustainably sourced as the other number plates). Getting the EV to become a socially desirable item that is available to everyone.

TR8

Active travel policy is an absolute necessity. If we don't get people using active methods of travel, then we will lose a fantastic opportunity to change our collective mentality. It needs to be safe (with specific biking and walking routes and other infrastructure) and incentivised. The necessary infrastructure is just not there, especially through town (which would help get people cycling to the town schools). The bus service will also be key in our fight against climate change, and its development into the future the same. It should be cheaper than driving and easy for people to use the service for their commute. Parking policy fits into this as well to disincentivise the use of cars and such vehicles. It needs to be large enough to make a large difference.

## TR9

Developing the bus service, as stated earlier, is key. Transforming service, pricing, and other matters will all encourage the increased usage of the bus. As the majority of people don't currently take the bus, the bus service needs to change to help serve them more.

## TR10

Improving active travel is a necessity because whilst taking the bus is great and much better than taking the car for the environment, having electric buses hasn't worked so far in Jersey. For this reason, walking or cycling to school, work or other destinations is very important. The expansion of traffic-free bike routes is also very important, as shown by how many people use the existing ones on the stretch of bike route 1 from Corbiere to town. If that kind of pedestrian/bike path was rolled out throughout the island, more people would cycle. Having facilities when people arrive is also important, and there are too few currently. It needs to be safe and easy to cycle, and the roll-out of traffic-free routes especially to the town schools is crucial.



TR11

De-carbonising air travel is hard, with necessary technology non-existent. We can't cut down on it either: as an island we rely on air travel for connectivity with the outside world, tourism and many other things. Yes air travel needs to cut down on emissions, but as an island we can't do that much about it. It would be best to focus on other policies and wait until we can do more about it. Sea travel is similar, but more achievable. We need to make the improvements that we can, but not focus on this too much.

### **A final note on transport**

The trade-off between cars and buses has been difficult to research: we just don't have the statistics. The government needs to get more of these statistics and make them more readily available to the public.

The difference in emissions between buses and cars massively depends on the average occupancy. The government needs to take these stats into account before making decisions. These problems with availability of statistics also apply to other areas, and need to be addressed.

## Le Rocquier School response to the draft Carbon Neutral Roadmap consultation

### What changes can we make at Le Rocquier School?

- Do a litter picking session more often.
- Influence other students to take action about climate change
- Have eco-friendly materials in the cafeteria.
- Make everything that is either to do with gas or oil, electric.
- Try and take the school busses to school.

#### **Quotes from pupils as part of the draft Carbon Neutral Roadmap consultation**

To reduce our carbon footprint we should get the school bus and walk or bike to school. If people live too far out and the bus doesn't go down that route, I think we should change the school buses routes so that everyone has the chance to get the bus, bike

In primary I never got taught about climate change but in secondary we learn a lot about climate change in geography and in form we sometimes talk about similar stuff relating to climate change.

I think that we should reduce the way most people come to school by a car

If you walk to school, you could possibly make friends with somebody who also walks.

Possibly change the school boiler to electric.

For students who have bike's but don't have a bike lock possibly school could provide students with bike lock perhaps at the equipment store

Add more recycling bins in the outside zone and hallways.

An eco-club after school where we can do more than what we do on Monday's

In-class presentations about the environment

Press team announcements

Eco-Team posters around the school building and surroundings

Assemblies have Eco-Team announcements

Consequences for littering e.g. c1 for littering c2 for being caught again and a c3 for being caught again

**What can we do to help climate change:**

Get an electric boiler instead of a gas boiler so you are not using as much carbon

Turn off heating in summer or when it is hot

We learnt about climate change in....

Geography

Eco rep meetings

## What can we do to help the eco community?

- If we see litter on the floor maybe pick it up and put it in the bin.
- Plant more plants.
- Re-use more paper as scrap.
- Re-cycle.
- Take eco-friendly transports to places e.g., bike, walk.
- Use less plastic.
- Use electric cars.

## Appendix 12.32: Pallot Steam, Motor and General Museum written submission

**To: Minister for the Environment**

### **Other Emissions**

**What impact will the Carbon Neutral Roadmap have on:**

#### **The running of our steam railway?**

We would normally run our steam train, which is fuelled by coal, one day a week throughout our Museum's season (April to October) and also at our popular Steam Fairs which, before Covid, were held twice a year.

#### **Vintage & Classic Vehicles?**

These wonderful old vehicles, which are an important part of our Island's history, are fuelled by petrol/diesel. Just a few of them that are on display in our Museum go 'on the road' for a run only occasionally and for short periods of time - it would be very sad if they merely became static displays.

There are also many privately owned such vehicles on the Island and the various local Motoring Clubs have many enthusiastic members.

[REDACTED]

[REDACTED]

Pallot Steam, Motor & General Museum

Rue du Bechet

Trinity, JE3 5BE

**Word count: 157**

## Appendix 12.33: Ports of Jersey written submission

### Ports of Jersey

St Peter, Jersey, JE1 1BY

T +44 (0)1534 447788 E enquiries@ports.je



# PORTS OF JERSEY

YOUR ISLAND GATEWAY

The Minister for the Environment  
Government of Jersey  
19-21 Broad Street  
St. Helier  
JERSEY  
JE2 3RR

31 January 2022

Dear Minister

### Carbon Neutral Roadmap consultation. General Submission: Transport Policies

Ports of Jersey Limited fully supports the adoption of TR11 – Emissions from aviation and maritime transport.

We fully support the adoption of the Jet Zero framework approach (scenario 2) confirming the Island's ambition to reduce emissions, aligning Jersey with the position in the UK, our largest market for air traffic.

The Jet Zero framework provides a roadmap for the decarbonisation of aviation. There is a clear focus and expectation of the impact of new sustainable fuels and technology, including zero emission aircraft technology. We strongly support positioning Jersey as an ideal location for innovation in sustainable aviation technologies and look forward to working with Government and our fellow States Owned Entities to position Jersey as such.

Equally, the Jet Zero framework recognises the vital role of connectivity for islanders, providing access to friends and family, higher education opportunities, medical treatment and the wider job market. Connectivity also underpins Jersey's visitor economy as well as providing our finance industry with a competitive advantage compared to other offshore jurisdictions.

The Jet Zero (scenario 2) supports the islands carbon reduction aspirations, enabling consumers to make sustainable choices, whilst protecting the connectivity that is essential to our economy and islander's lives.

Recognition that the transition to net-zero aviation will require a coordinated, holistic and multi-faceted government framework which will be worked on with Ports of Jersey is fully supported and we look forward to working with Government to develop this framework and playing a key role in its implementation.

Regarding maritime transport, we support the Carbon Neutral Roadmap approach seeking compliance with the International Maritime Organisation's pollution prevention treaty, MARPOL.

In conclusion, Ports of Jersey is fully supportive of the draft policy framework for Emissions from aviation and maritime transport. It provides a clear and demonstrable roadmap framework to decarbonise an important part of our economy.

For further correspondence, please contact [REDACTED]

Yours sincerely

[REDACTED]  
[REDACTED]  
**Ports of Jersey Limited**

Word Count: 355 words

## Public Health Directorate

### Public Health response to the Carbon Neutral Roadmap consultation

Public Health is grateful for the opportunity to respond to the Carbon Neutral Roadmap consultation. The Roadmap is a long-term plan for Jersey to become carbon neutral by 2030 and sets out the policies and investment required to achieve it. The Roadmap recognises the health and wellbeing benefits that could result from policies to reduce Jersey's carbon emissions, which Public Health believes provides a strong additional rationale for acting on climate change.

In this response, we summarise briefly the evidence on the potential health benefits associated with policies to reduce carbon emissions, including policies on transport and heating. Whilst policy development in these areas can positively influence the wider determinants of population health, it must seek to do so in a manner that is fair and addresses health disparities between different population groups. To that end, the successful delivery of the Roadmap requires a coordinated, intersectoral approach to respond to the range of issues relating to health and policies to reduce carbon emissions.

### Transport

Public Health supports the proposed measures to reduce carbon emissions generated by transport. Transport policies – focusing on cleaner vehicles, increasing active travel such as walking or cycling, and reviewing roads laws to ensure safe, low-carbon travel – have potential benefits for population health. It is well-established, for example, that encouraging physical activity through active travel is linked to preventive health benefits, including a reduced risk from diabetes, obesity, cardiovascular diseases, strokes, and cancers<sup>1</sup>. It has also been shown to help improve mental health<sup>2</sup> and general wellbeing. Transport policies may also benefit population health by reducing air pollution, which is associated with a greater risk of heart and lung diseases<sup>3</sup>.

Public Health supports the move towards fully electric vehicles rather than hybrid or alternative fuel. Other fuels can introduce different health implications due to their impact on air quality.

### Heating

Public Health supports the proposed measures to decarbonise heating for homes and businesses, and the intention to help people make this change outlined in the draft Roadmap. It is noted that the main strategy for decarbonising heating is by improving heating systems, switching fuels, and improving the energy efficiency of buildings. These measures have the potential to make heating more affordable and improve the comfort of homes, which are beneficial for people's health and wellbeing<sup>4</sup>. They also have the potential to play a part in reducing the effects of extreme heat events. There is evidence to suggest, for example, that a large share of excess winter mortality is attributable to the preventable experience of living in a cold home<sup>5</sup>.

<sup>1</sup> World Health Organisation. 2014. WHO | Physical activity. [Online] Available at: [http://www.who.int/topics/physical\\_activity/en/](http://www.who.int/topics/physical_activity/en/)

<sup>2</sup> Rimer J, Dwan K, Lawlor DA et al. (2012) Exercise for depression. Cochrane Database Systematic Review 11 7: CD004366

<sup>3</sup> World Health Organization, *Health effects of transport related air pollution*. 2005, World Health Organization: Copenhagen.

<sup>4</sup> James Milner et al. (2021). Health Benefits of Policies to Reduce Carbon Emissions. British Medical Journal. [Online] Available at: <https://www.bmj.com/content/368/bmj.l6758>

<sup>5</sup> Clinch, P. and Healy, J. (2000). *Housing standards and excess winter mortality*. British Medical Journal. [Online] Available at: <https://jech.bmj.com/content/54/9/719>

Any proposals should, however, consider the potential adverse impact of increased noise on direct neighbours or the wider community if a few air source heat pumps are introduced to an area, causing noise creep.

In proposing policies to decarbonise heating and improve the energy efficiency of buildings, it is also important to recognise the potential challenges this may cause for low-income households in relation to cost and affordability. The responsibility to reduce Jersey's carbon emissions must be shared fairly amongst the population and, similarly, must not reinforce health disparities. We are encouraged that the draft Roadmap commits to a 'Just Transition', and we believe that the proposal to subsidise the costs of installing new heating systems and improving the energy efficiency of homes will help to ensure lower-income households are not disproportionately affected. We would support the extension of the scheme to include rental properties, where landlords have, historically, been less inclined to improve heating systems because the benefit goes to the tenant.

### **Food consumption**

The draft Roadmap notes that consumers are increasingly considering the carbon footprint of food when making purchasing decisions. Dietary changes have the potential to reduce carbon emissions and offer mutual public health gains. However, food chains and diets are complex and, as the draft Roadmap notes, it would require fundamental and potentially unfeasible modifications to people's consumption patterns. Food consumption should, nevertheless, remain part of the draft Roadmap since a healthy diet and related-healthier behaviours have an impact on the wider determinants of population health. Public Health would, therefore, wish to support policy development in this area, and build on the actions set out in the [2017-2022 Food and Nutrition Strategy](#) to promote a healthy diet, including the affordability of healthy food, reduction in food waste with subsequent economic benefits, increasing the consumption of fruit and vegetables, creating healthy food environments, and engaging with local food production and sustainability.

### **Health in All Policies**

Public Health is committed to supporting action to reduce Jersey's carbon emissions by 2030. As the draft Roadmap emphasises, reducing carbon emissions has the potential to lead to significant public health benefits, and to address the wider socioeconomic and environmental determinants of health. Public Health would, therefore, welcome the opportunity to collaborate on policies arising from the draft Roadmap, by adopting a Health in All Policies approach, to ensure policy integration, promote mutual policy objectives and to secure the benefits of Jersey's carbon neutral future.

**Public Health Directorate**  
**January 2022**

## Appendix 12.35: Rabey's Group written submission



**The Minister for the Environment**

**States of Jersey**

**31.01.22**

**Dear Sir**

**Carbon Neutral Road Map feedback.**

**Reference - TR3 Supporting transition fuels (page 85)**

**After reading through the draft carbon neutral road map we would like to submit our suggestion/proposal on behalf of Rabey's Commercials (part of the Rabey's Group CI Ltd). We feel this would be a benefit our island as we progress towards carbon neutrality. We have focused on the TR3 section as this is one where we feel the short-term impact of our suggestion/proposal would work well and show benefits within the scope of the Road Map journey**

We were surprised that there are no alternatives mentioned to Biofuel in the Draft Carbon Neutral Road Map, which was actually suggested by the Citizens Assembly last year. It was also on show at the recent Sustainable Transport Event in St Helier with a lot of interest.

I would like to propose that the government look at proven Carbon Reduction Systems such as AtmosClear. A proven system already on the market (statistics attached) from the Paris Clean Air Project in 2019.

**By using a Carbon reduction system (which reduces emissions by up to 80%) on selected / all island vehicles, the benefits are immense for the island's carbon footprint, our stature in the global arena, as well as the island's financial sustainability. The benefits are immense;**

- A bridge to gap the transition from fossil fuel to ultimately all EV vehicles ownership
- Revenue generated through fossil fuel duty can be retained and indeed increased
- Massive reduction in Offsetting charges due to the effectiveness (up to 80% reduction) of the Carbon reduction systems fitted to all fossil fuel vehicles left on the island.
- Can be fitted to any fossil fuel vehicle be it car, van, truck, HG, as well as buses, agricultural vehicles and marine engines. Educating public transport emissions without the large financial outlay on EV buses in the initial transition period.

Cont'd



## **So how would we look to implement this? One suggestion may be:**

With the banning of importing fossil fuels vehicles into the island by 2030 this is a perfect time to work with the vehicles on island leading up to this deadline. Not only to reduce carbon emissions but to maintain and improve fuel duty revenue for the government

### **Affordability**

A carbon reduction system (an unobtrusive and compact unit fitted under the bonnet) currently retails at a fully fitted price of £800 including GST (for cars vans and light commercial trucks up to 4 litres) A larger, slightly more expensive unit for HGV, marine and agricultural vehicles is also available but we would like to focus on the smaller car and vans on the island due to larger volumes for now.

To incentivise the user to have one of these units fitted a government subsidy of £500 (as an example) would be issued to the garage and a certificate issued to the owner (who would pay the difference) once this was paid by the Government. This certificate number would then be sent to the DVS who would then register the vehicle as having a Carbon reduction system fitted.

As these units are interchangeable, the unit can be changed as the owner upgrades to their next affordable vehicle purchase. The end game would be that the owner eventually purchases an EV (electric vehicle)

This initiative could be introduced initially to vehicles over three years old. (The older the car, the higher the emissions, and the greater impact on carbon reduction for the older vehicles) and will then reduce the islands carbon footprint.

An alternative could be to introduce a law that any vehicle over 5 years old MUST be fitted with a carbon reduction unit or a fine imposed. (policed by the production of a certificate, a bit like producing a licence at the roadside)

As the Government ban on imported fossil fuel vehicles comes into force (a fantastic ideas and one proposed by the Citizens Assembly) it will automatically create an island only vehicle purchase scenario. This will mean that the flow of vehicles will be part exchanged in a way that people will purchased a more desirable newer used vehicle.

### **General vehicle purchase trends are to improve on what owners currently have, for example;**

<b>Current vehicle value -</b>	<b>replacement vehicle purchase</b>	<b>potential vehicle purchase type</b>
£100 - £1000	£2000 - £5000	fossil fuel vehicle
£1500 - £3000	£6000 - £10000	fossil fuel vehicle
£4000 - £10000	£15000 - £20000	Used EV or fossil fuel vehicle
£11000 - £15000	£25000 - £40000	Electric vehicle
£16000 upwards	£45000 plus	Electric vehicle

With the introduction of MOT's in 2024 there will be an automatic scrappage element as vehicles fail the MOT and are not cost effective to repair. If the vehicles would have had a carbon reduction unit fitted this could be transferred on to the newly purchased replacement vehicle. It should be that all used fossil-fuelled vehicles MUST have a certificate issued.

## **Subsidy Support**

By offering a Government subsidy starting with 7 year plus cars in the first year then 6 year old vehicles in the second year , 5 year old in the third etc. and each year down to 3 years old, vehicles,

The cost to the government can be controlled and would more than be supported by fossil fuel revenue, rather than instantly trying to reduce fossil fuel ownership by a process does in the first instance looks like a penalty for not being able to afford an EV.

This is only a viewpoint but hopefully one that is food for thought for the group to consider and one that is a proven system as can be seen in the attached documents.

To finish I am sure the introduction of a carbon reduction system would be a perfect and viable option to bridge the gap towards an all-electric vehicle island and one option that will ensure reduced carbon emissions continued fuel duty revenue to help support the funding of such initiatives.

I would welcome the chance to meet and discuss my vision if this would be of any value to the group.

My contact number is [REDACTED] or email [REDACTED]

Thank you for taking the time to read the above.

Regards

[REDACTED]  
Rabeys Group CI Ltd  
[REDACTED]

**WORD COUNT - 1051 WORDS**

## Appendix 12.36: RBS International written submission



Mr John Young  
Minister for the Environment  
Government of Jersey

Dear Mr Young

RBS International is supportive of the proposed Jersey Carbon Neutral Roadmap (the 'Roadmap') and believes this is an important step for both the business community and islanders as we strive towards a net zero economy.

At RBS International, our purpose is to champion potential, helping people, families and businesses to thrive. In 2020, we launched our purpose-led strategy, underpinned by three areas of focus; enterprise, learning and climate. We are committed to working collaboratively with the communities we serve to drive environmental and societal goals.

The Roadmap recognises that covid-19 has challenged members of our community, particularly those most vulnerable in society, but we believe that building back sustainably will prevent further inequalities as we experience the impacts of climate change.

Climate change is the biggest challenge facing society today and the financial sector has a critical role to play in tackling it. At RBS International, we are determined to lead the way and, as part of NatWest Group, we were proud to be a principal partner at COP26.

As a Jersey headquartered bank, we recognise our responsibility to align our business activity with the Roadmap. We welcome this opportunity to share our thoughts and look forward to working with the Government of Jersey to implement across the island.

### *Enabling the transition*

RBS International is an adamant supporter of the just transition, understanding that both climate change and the pace at which we transition to a net zero economy will have societal costs. We must collectively engage with communities to ensure individuals are a part of the journey.

Through our daily interactions with customers, we support a broad range of activities, including: families purchasing a new home, individuals growing their businesses or investment in new infrastructure. We aim to provide necessary capital needed to fund the just transition and have delivered £1.4bn in Climate & Sustainable Funding and Financing (2020 – Q3 2021).

The Roadmap places a focus on consumer spending but the financial industry must acknowledge the climate impact of financing activity and introduce new measures to deliver sustainable lending. As part of NatWest Group, RBS International supports the ambition to reduce the climate impact of our lending by 50% by 2030 (vs. 2019) and intend to do what is necessary to achieve alignment with the 2015 Paris Agreement.

The risks associated with climate change are complex and pervasive. Climate change represents inherent risks to the financial industry and the customers we serve. The potential impact to the global economy, asset values and operational costs will be felt across society.

We believe that climate conversations with our customers are vital to protect the longevity of businesses and identify where we can help as their banking partner. RBS International has introduced required climate awareness training for all colleagues. Additionally, more than 120 colleagues have been provided with formal climate training from either the University of Edinburgh or the Cambridge Institute of Sustainability Leadership to facilitate meaningful discussions.

The orderly introduction of environmental, social and governance (ESG) reporting standards would bring Jersey in-line with the UK as disclosures under the Task Force on Climate-Related Financial Disclosures (TCFD) framework become mandatory. RBS International supports the NatWest Group Climate-Related Disclosures Report and has found the TCFD a useful tool to develop our own internal climate strategy.

We encourage further dialogue on climate-related risks and ESG reporting between the Government of Jersey, the Jersey Financial Services Commission and the financial industry to maintain the integrity of Jersey as an international finance centre.

#### *Built environment*

The Roadmap highlights that 35% of the total Jersey greenhouse gas (GHG) emissions result from property heating, cooling and cooking. RBS International is pleased to see the introduction of mandatory Energy Performance Certificate (EPC) requirements for residential and commercial properties.

Financial incentives for customers purchasing energy efficient properties or making energy efficiency improvements are necessary as rising energy prices and inflation place further pressure on households. In 2021, we introduced a new Green Mortgage product with a reduced interest rate for customers purchasing an EPC A or B property in the UK. The existing EPC infrastructure in the UK made this possible and we hope to offer to Jersey customers as EPCs become commonplace.

To enable action, it is crucial that the EPC data infrastructure is easily accessible and can interact efficiently with the financial industry. This will allow RBS International to develop climate-focused propositions that support islanders to make climate-positive choices.

COP26 highlighted that policy makers and private markets must collaborate to tackle climate change. We believe that the ability to integrate energy audit subsidies into private market solutions would help achieve the targets outlined in the Roadmap. The integration of EPCs will highlight the pace of action required to achieve alignment with the 2015 Paris Agreement. Any actions to accelerate integration must be seen as a positive step towards a carbon neutral Jersey.

This model may be replicated to introduce combined public and private market financial incentives that support the transition to low carbon heating systems.

### *Own operations and carbon offsets*

NatWest Group, including RBS International, achieved carbon neutral status for scope 1 and scope 2 emissions in 2020. We achieved this through a combination of emissions reductions, in line with our 1.5-degree science-based target commitment, alongside offsetting residual emissions through the purchase of internationally recognised TIST carbon credits.

Our new ways of working has provided colleagues with greater flexibility to work from home. It is important that businesses understand the climate impact of homeworking and NatWest Group partnered with EcoAct and Lloyds Banking Group to help calculate the resulting emissions. We would be pleased to support future engagement as outlined in the Roadmap.

RBS International has made improvements to our Jersey office to promote climate-positive behaviour, including improved facilities to encourage cycling to work. Employers must remove barriers facing employees as they strive to take climate-positive actions.

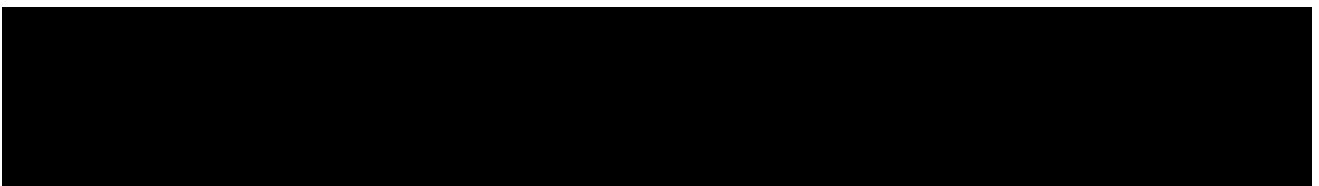
In 2021, we launched Giki Zero for all colleagues, allowing individuals to measure their carbon footprint and develop a personalised action plan to reduce their carbon impact.

### *Private market collaboration*

Emerging sustainable technologies are benefiting from 'crowding-in' of public investment as Governments pave the way for increased private investment. We encourage further exploration of public-private funding models to deliver the solutions needed to tackle climate change, at the pace required. The potential success of this model was recently demonstrated through the covid-19 relief schemes and we believe the culture of partnership must be protected to maximise the benefit to society.

RBS International is pleased to see the theme of collaboration extending to a proposed new Carbon Neutral Alliance. We look forward to working with our peers and the Government of Jersey in the near future.

Kind regards



Word count: 1135



## Submission from Reform Jersey on the Draft Carbon Neutral Roadmap

31/1/22

### General Submission

Dear Environment Minister,

As a party, Reform Jersey is committed to ensuring that Jersey plays its part in addressing the climate change crisis. The target for carbon neutrality by 2030 was originally set by the States Assembly decision to adopt P.27/2019, which was proposed by Deputy Rob Ward, who holds Reform Jersey's environment portfolio. We owe it to future generations to ensure that this target is met and we create for them an environment in which they can thrive, protected by the resilience provided by ensuring we are prepared for the challenges of the future.

Addressing the climate emergency provides Jersey with an opportunity not just to reduce our carbon emissions, but to improve the standard of living for Islanders and ensure our future economic prosperity is sustainable. Whilst many fear that the expense incurred by having to fund the initiatives which will reduce carbon emissions will financially hurt our society, we should be able to allay these fears by proving that the measures taken will ultimately benefit people as they live their day to day lives.

Reform Jersey would urge the government, in so far as is possible, to 'front-load' the delivery of programmes which will have a clear and tangible impact in improving the quality of life for Islanders. Things like; an improved public transport network, or insulation in homes which brings down energy bills, will be a positive way of ensuring the public buys into this agenda and it can maintain the political support which it needs to succeed.

### Transport Policies

We are broadly supportive of the aims included in the roadmap to reduce emissions from transport. Namely, to speed up the use of electric vehicles by cutting emissions duty, incentives to scrap old polluting vehicles, to end the importation of petrol and diesel vehicles from 2030, to work with Jersey Electricity to scale up EV charging, to subsidise the rate of fuel duty on renewable diesel, to review the roads law to ensure safe low-carbon travel, and to support walking, cycling and bus journeys.

Some further comments:

- Before expecting people to reduce the number of petrol/ diesel car journeys, there should be safer walking and cycling routes in place, and a more user-friendly bus service. It's imperative that realistic alternatives are in place first.
- We have long supported further incentivising the use of public transport by bringing fares down, or eliminating them entirely. Other jurisdictions have shown this can work (e.g Luxembourg).
- Long term interest-free loans becoming available for Jersey residents to buy an electric vehicle, whether a car or bicycle, would assist those on lower incomes in making this change.
- Reducing duty on biodiesel with immediate effect would help promote it as a transition fuel whilst further work is done to improve infrastructure for EVs.

### Heating Policies

We support the aims to subsidise the cost of new heating systems and better home insulation, to introduce energy performance certificates, to ensure all new buildings are energy efficient, and to end the installation of new oil, gas, and coal boilers from 2026. As well as reducing our carbon emissions, this will reduce energy bills and therefore support Islanders struggling with the cost of living.

Further comments:

- Work must be done to ensure that rental homes in the private sector can be included in efforts to improve home insulation, as the tenants

themselves will not have the right to initiate this for their homes, and the owners may not consider it worthwhile for them to do.

- Making available part grants/ interest free loans to be for home insulation and domestic renewables installations will help incentivise households to make this change.
- New buildings should be required to have renewables installed. For example, in France new builds must have either a green roof or solar panels on the roof
- A review of the potential in Jersey of hydrogen power and of tidal power, and ongoing consideration of all renewable power, for interests of heating and power sovereignty must be considered.

### Other Emissions Policies

We support the aims to deliver an education programme, to drive down the carbon impact of the construction sector, to publish a net zero Rural Economy Strategy, to seek extension of the UK's compliance with the Kigali Amendment, and to deliver a sustainable finance framework

We would support:

- Programmes to encourage repair and recycling of goods, including a repair hub.
- Encouragement to buy second-hand products rather than new
- Assistance for agriculture businesses to use fewer fossil fuel products and reduce emissions by embracing regenerative agriculture, to work towards the Leaf Mark accreditation
- Engagement with the finance industry to develop sustainable finance plans

### Enabling Policies

We support the aims to decarbonise the Government of Jersey's operations in line with the Paris Agreement targets, to create a Carbon Neutral Alliance and Climate Action Fund to support grassroots projects, to develop on Island skills, to deliver the COP26 education pledge, and to undertake the necessary work to ensure Jersey can become carbon neutral.

This can include:



- Biodiversity projects to be prioritised
- Blue carbon sequestration plans to be prioritised
- University Degrees on environment subjects to be available at Highlands

### Closing comments

Jersey is in a fortunate position in that we own our utilities (except Jersey Gas) and can therefore play an active role in setting their strategic direction, based on our political priorities. In our engagement with the leadership of the JEC, we have found them to be sincere in their desire to play their part in delivering carbon neutrality in Jersey, but their enthusiasm is not always matched by the government departments they have to interact with, which can hold them back. This must change.

We would also recommend that close attention be given to the “Jersey for Good - a Sustainable Future” report from Jersey Finance, which outlines how our biggest industry can play its part in supporting carbon neutral initiatives both here and around the world. This could be an excellent opportunity to have an impact beyond our own shores.

Word count - 1010

Contact [REDACTED] / [admin@reformjersey.je](mailto:admin@reformjersey.je)

## Appendix 12.38: Romerils written submissions

### Consultation comments on the draft Carbon Neutral Roadmap on behalf of B.G. Romeril & Co. Limited (Romerils) submitted by [REDACTED]

#### A. GENERAL COMMENTS;

1. Romerils welcomes the invitation to take part in the Carbon Neutral Roadmap Consultation. We recognise the challenges that the climate emergency poses and acknowledge the importance of change. Our overall position is of support.
2. The consultation period (17/12/21 to 31/1/22) at 44 days (28 working days) is too short, especially with Christmas/New Year holidays and Covid challenges. This doesn't give confidence that the policy detail which will need to be worked on, especially with industry, will be achieved, as there hasn't been sufficient time to consult with the relevant parties. This process is rushed and needs more time and consideration.
3. There is a lack of detail in many of the policies. Most of the policies need further research and understanding of implications and possibly new products and skills sourced, trialled and embedded. There are insufficient detail in many of the policies which make it hard to consult / vote on.
4. **"Funding a Just Transition"**, page 10/11. Especially item 1.13; there is a danger that the cost of carbon neutrality will cause dramatic inflation (in an already inflationary period) and will therefore adversely affect lower income residents. This is not a "Just Transition".
5. **The "Energy Trilemma"**, page 28, (Affordable/Available v Green/Clean v Secure/Reliable) is so relevant to us. The 3 aspects must be continually and coequally considered. Rather than a "mad rush, because it's the right thing to do". Sadly, affordability and sustainability ('green') are inextricably apposed. The policies concerning energy (electricity) must have affordability more highly considered. The financial effects on individuals and businesses are significant. The switch to electricity will be expensive and questions a "Just Transition".
6. **Product "maturity"**, page 30, points 4.12 are 4.15 are significant. Reliable and affordable products (with local engineers to service/repair) will take years to establish themselves and early adoption will be expensive. Therefore, care needs to be taken in setting deadlines that will be in advance of our major supply source (UK), as manufactures are working to the timelines of their major markets, not ours.
7. **Timeline**, page 43, Jersey's emissions will be approximately 40% less that the UK by 2030 (let alone larger savings than France, Guernsey and the Isle of Man). Can we afford this? Will the products be available for us to achieve this? Are we being overly ambitious? We are too small an economy to drive this innovation and should be in line with our major supply routes. As point 6.
8. **Strategic Policy 3** – the reinvestigation of a solid waste charge. Will a "solid waste charge" adversely affect Jersey based retailers (against online competition)? i.e., if Romerils import a washing machine with associated packaging waste that is charged to Romerils, will that charge also be applicable to a non-Jersey online retailer? This must be considered.
9. **Jersey Electricity Company**: One of the HT1 policy assumptions is "That there is sufficient electricity capacity to meet the increased demand from these fuel switches". Jersey needs to verify this assumption before we proceed. How quickly can the infrastructure be brought in? At what cost?
10. When looking at the policies as a whole, the implications are vast, with many affects. Therefore, the sum total of the affects is likely to be underestimated – both the effect on society and the economy. It is important that the Roadmap is reviewed every 4 years.

**Consultation comments on the draft Carbon Neutral Roadmap on behalf of B.G. Romeril & Co. Limited (Romerils) submitted by [REDACTED]**

**B. TRANSPORT;**

1. **TR1:** Costs of mid-size, and above, electric commercial vehicles are currently prohibitively expensive and unreliable. We respect that this is not coming into play until after 2030, and technology will improve, but currently this is not at all feasible so mid-size / large vehicles should not be included in this policy.
2. **TR1:** What is the plan for electric vehicle charging points? There is a lack of detail – where are they going to be? Will parishes allow it? Will planning allow it? There needs to be a plan for this in this policy.
3. **TR3:** Is SGRD going to damage engines? Current (positive) trials in Jersey are small in size, therefore cannot be relied on. What will the “ongoing” price of renewable diesel be as Europe will increase their consumption, surely prices will inflate? Can Jersey afford to keep subsidising it? What will the duty be? Also, the policy should subsidise to price parity, otherwise affordability is an issue.
4. **TR4:** Detail on increased fuel duty on petrol and diesel, and VED on vehicles, is yet to be finalised. Duty reduction on electric vehicles is also yet to be finalised. Until we know the duty changes how can we feedback? There is insufficient detail in this policy.

Word Count: 205

## Consultation comments on the draft Carbon Neutral Roadmap on behalf of B.G. Romeril & Co. Limited (Romerils) submitted by [REDACTED]

### C. HEATING;

Romerils' core business is supplying heating and plumbing products directly to the construction industry. We are one of the largest suppliers of heating products in the Island and are therefore well-placed to understand the driving factors in the marketplace.

1. **HT1:** This policy prohibits new fossil fuel boilers being installed in any property after 1st January 2026. The European heating industry is only now heavily investing in R&D towards viable fossil fuel alternatives. Therefore, early innovation is expensive. We need to gain more understanding of the electric and renewable heating market, review existing suppliers and explore new suppliers in order to form this policy better.
  - a. Electric boilers are often more expensive to run. This does not pose a "Just Transition".
  - b. After 2026, any new boiler must be electric – there needs to be room for alternatives in the policy as they become available and mature.
2. **HT1:** Through our experience in the industry, any residential property larger than two/two and half bedrooms will need a boiler of at least 15Kw. This is the maximum size of electric boiler that operates on a standard single phase electricity supply, so if the property needs more than 15Kw, then a three phase supply is needed (dig up the road/drive/garden etc.). This will cost approx. £8,000 with the new boiler being another £7,000 (minimum). So even with a £5,000 subsidy, this is too expensive. Moreover, the electric boiler will cost 40% more to run. Is this a "Just Transition"?
3. **HT1:** Following on from point 2., an air source heat pumps (as an alternative to an electric boiler) will not suit many properties as the insulation will be below current standards.
4. **HT1:** There is no detail on the opportunities in converting existing oil boilers that use kerosene to hydrotreated vegetable oil (HVO). As quoted, there are "21,559" fossil fuel boilers in Jersey. Swapping these boilers to electric as they fail after 2026 will be a huge task. HVO could reduce the carbon emissions from oil boilers for a transition period. Swapping to HVO should also be encouraged before this date. There is a policy on SGRD for transport, why is there not one for heating?
5. **HT2:** New bye-laws on insulation in new builds. The costs of hitting these standards are not properly considered. Note: between 33%-50% of the cost of insulation in Jersey is sea freight.
6. **HT2:** There are a vast majority of residential units which are over 15 years old, and therefore the standards of insulation are lower. It is preferable to insulate rather than heat, however the cost of retrofitting insulation is enormous, including a shortage of labour. This cost of retrofitting must be addressed in this policy. There should be a subsidy to help people retrofit insulation.
7. **HT3:** What will the minimum standard of energy efficiency be? Will it leave properties unavailable to occupy? Is there sufficient labour to insulate? What is the cost of insulation? Takes us back to the "Energy Trilemma" and "Funding a Just Transition". Jersey already has a housing crisis (and a shortage of commercial premises), could this inadvertently exacerbate this issue?
8. **HT3:** There is a current shortage of skilled EPC providers. This must be addressed before the policy is enforced.

**Consultation comments on the draft Carbon Neutral Roadmap on behalf of B.G. Romeril & Co. Limited (Romerils) submitted by [REDACTED]**

**D: ENABLING EMISSIONS;**

1. **EN2:** We very much support the concept of a 'Carbon Neutral Alliance' and would wish to be involved. We would also support the provision of a small grants fund to stimulate local networks and innovation.
2. **EN3:** Very much support the concept of developing supply chains and on-Island skills. Historically, we have worked with Highlands on new products for their training, so we would be very enthusiastic to connect our supply chain to assist in addressing any skills gaps.

Word Count: 82

## Appendix 12.39: Rubis Channel Islands written submission



31<sup>st</sup> January 2022

### General Submission/ Transport Policy/ Heating Policy/ Enabling Policy

Dear Minister for the Environment

Firstly we would like to express our gratitude for the work you and your team have put into the Carbon Neutral Roadmap (CNR). This is a significant piece of work which has engaged a whole community in its development, whilst this may only be the beginning of the roadmap, the journey to get to this point is a testament to the energy & effort your team have put in. Thank you.

Rubis Channel Islands (Rubis) has been an active participant in the development of the CNR, as a transitioning Fossil Fuel Distributor to Energy Provider and a key member of the Energy Forum.

Rubis has been evolving as a business over the last 3 years, we have changed from a fuel distributor to an energy provider. The key elements of this transition have been the launch of Renewable Diesel, Renewable Heating Oil and the recent launch of our Solar PV offering.

Rubis are supported by our ultimate parent company, The Rubis Group, who have been investing in Hydrogen & Solar, and have recently set up a new division with the group – Rubis Renewables. Rubis is seen as a test bed for new technologies and products and will have access to an innovative product range as the global energy transition unfolds.

These are not just words, to highlight what we have already achieved it is worth noting that Sion Garage was the first forecourt in Britain (and possibly Europe) to have a Renewable Diesel available to the public. Rubis are the first energy company in Europe to supply a Renewable Heating Oil and we are also able to manage the boiler conversion process from fossil fuel to renewable. These are significant steps, which as a business we are proud of, and show that we are here driving the transition not just talking about it.

We can adapt to change, new information, new regulation, and new technologies, we are here to work with Government and the community of Jersey for a brighter future.

We are supportive of the CNR and the aims, there are some points which we believe require further attention and have outlined these below.

## **Transport**

Generally, we believe there should be more in the policy to encourage commercial vehicles (light/ HGV) to make the switch to SGRD now rather than wait for electric/ hydrogen alternatives, to become available. The Eco driving programme, was a great education piece for businesses but this needs to be repeated and more to be done to highlight how businesses can make the transition from fossil fuels to other sources.

TR1: We would welcome the opportunity to join the 'Competent Person Scheme' for electric car charger.

TR3: We ask the implementation of the subsidy scheme is accelerated to come into effect in 2022. Since SGRD has been available (late 2019) on the Island we have been informing and educating business and consumers on the product and how this can help make the transition to carbon neutrality.

This is a quick win, the product is available from all four fuel distributors, consumers and businesses are already using the product but to increase uptake a subsidy is needed. The sooner the subsidy can come into effect the quicker diesel vehicles will make the transition.

TR11: We have access to Sustainable Aviation Fuel and are readily able to supply this on island, we are currently working with the Ports of Guernsey on this for a trial in Guernsey. We are happy to discuss with the Ports of Jersey team.

We have also been supplying SGRD into commercial vessels, we are soon to start trials in the pleasure craft market. There is a growing demand in the Super Yacht market, which we are well positioned to facilitate.

## **Heating**

HT1: We are pleased to highlight that we have been successfully trialling EcoHeat100, our 100% Renewable Heating Oil, for over 12 months in our own heating system and some of our staff. This is a

credible option for householders and businesses to switch to without the significant costs of an entire new heating system.

There is an option to permanently convert a fossil fuel boiler to a renewable fuel boiler, costing on average £500. We strongly believe this is a solution which will best use the budget set aside for the HT1 scheme. For example, if the whole £5,706,227 budget was set aside to convert fossil fuel boilers to renewable boilers over 11,400 would be converted, compared to 998 in the current plan. Even if only a small portion of the budget was dedicated to this, we would see a significant acceleration in meeting targets in the CNR.

Rubis are willing to work with yourselves to work on making this an option for householders and businesses.

HT2: We are in acceptance of the move to ban fossil fuel boilers. We are surprised at the speed of this and would welcome measures to be in place to ensure the transition will not unduly affect householders and businesses. There is a need to 'pay' for the transition, as stated in the CNR, but there is a need to encourage those who can readily switch and support those who can't.

There are renewable fuel boilers on the market and having liaised with boiler manufacturers directly, we know more will be readily available in 2022. This will help to allay the concerns of those with fossil fuel boilers that their heating system will become unserviceable.

## **Enabling Policies**

EN3: We are currently experiencing issues with recruiting local skilled staff across a variety of positions. The piece of work in EN3 needs to be accelerated to be able to achieve many of the objectives in the CNR.

There will be a need to upskill existing skilled workers and due to the requirements of the transition, the workforce in the energy industry will need to increase.

## **General Points**

### Market Review

The energy market review and subsequent policy is critical to the successful implementation of the CNR. We are significantly concerned that the current timings will have an adverse impact on the ability of the industry to facilitate an energy transition.



A competitive energy market with a mix of energy sources will help to provide the balance in the energy 'trilemma'. Rubis are here to offer support whenever needed, there are going to be challenging times ahead but with a community, industry and Government willing to engage we are sure to make it work.

The energy market review will help to address competition in the local energy market in the long term, our greatest concern is the short-term stifling of competition. The liquid fuel market is competitive, we have seen this demonstrated by a range of innovative new products and services offered those in the market as part of the energy transition.

There is a need to address the issues new entrants face when trying to enter the electricity market, at present there is not enough visibility for new entrants to invest in the long term. This will have an impact on the ability to meet the carbon neutrality targets set in the CNR. We would ask that the Minister gives consideration to the issues new entrants face.

#### Fair Communication

We are concerned with communications that do not represent the other sources of energy fairly, there often seems to be a message of the only way to be carbon neutral is to go electric. This is not the case and we would like to see more balance, which will recognise the need for an energy mix going forward. This will help to provide security to those householders who are concerned they are being 'forced' to switch to electricity.

#### Bold Decision Making

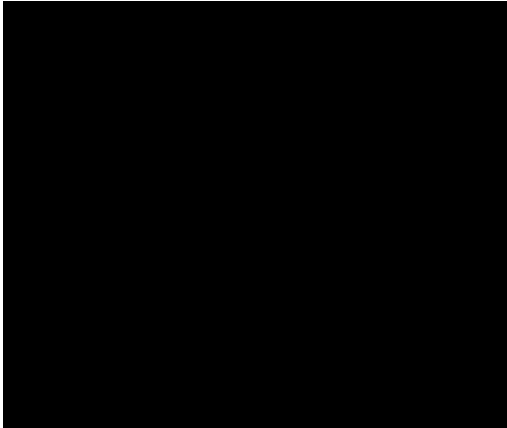
The future is uncertain, not all policies will work but we should not be paralysed by the fear of failure. There will be a constant stream of new information and new technologies at an unprecedented speed of change. We need bold decision making, that does not mean rash, but we need our leaders whether that is political, industry, business, and community to come together to work through the issues we face.

We fully agree with the need for an Energy Minister and suitable frameworks to ensure there is ongoing communication and engagement with the community on the delivery of the CNR. There is a need to continue the positive work so far, to the implementation stage, this is just the start.

In summary, Rubis Channel Islands view the Carbon Neutral Roadmap as a great starting point to deliver carbon neutrality in Jersey. There has been a fantastic amount of work to get to this point but now implementation starts.

We are here to support Government, our customers and the wider island of Jersey with the implementation of the Carbon Neutral Roadmap. Any assistance we can provide please do not hesitate to contact us.

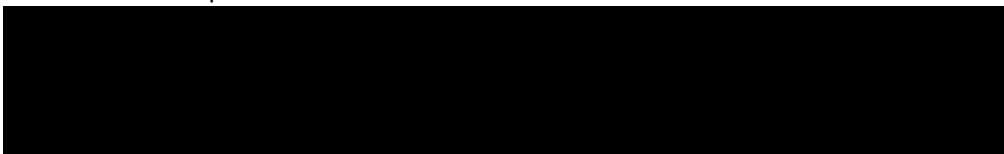
Your sincerely



**Rubis Channel Islands**

Word Count: 1,500

Further Correspondence



# Appendix 12.40: Skipton International written submission

**For the attention of: Minister for the Environment**

**Jersey Carbon Neutral Roadmap consultation – Heating Policies**

**Response from Skipton International Limited**

**Author:** [REDACTED]

**27 January 2021**

## **Background**

Skipton International (Skipton) is a Guernsey registered bank that has provided mortgages to Jersey residents for the purchase of property since 2005. Currently, Skipton provides around 2,500 mortgages representing a current investment of over £600m in the Jersey residential property market.

In 2021 Skipton was the first Channel Island banking organisation to become a member of the United Nations Environment Programme – Finance Initiative (UNEP FI) and is currently one of only 15 UK banks/building societies to have done so. This is a partnership between UNEP and the global financial sector to mobilize private sector finance for sustainable development. UNEP FI works to help create a financial sector that serves people and planet while delivering positive impacts.

To deliver upon Skipton's commitment to the UNEP FI we are currently completing an impact analysis to determine where Skipton has positive or negative impacts upon society, the environment and the economy. Then SMART targets will be set to address these impacts and regular public reporting of progress will be made.

As Skipton predominantly provides finance supporting property purchases it is our expectation that Targets will be linked to improving the energy efficiency of the properties on which we lend. However, the lack of current property energy performance data across the Channel Islands is a challenge, one that has been addressed in our larger market, the UK, through the provision of Energy Performance Certificates (EPCs).

## **Consultation Response to HT3 – Energy Performance Certificates**

Skipton supports the proposal to develop and introduce legislation to make both domestic and commercial EPCs mandatory at the point of sale and rental by the end of 2024.

However, Skipton has concerns relating to the setting of minimum standards from 2026.

Skipton's views are expanded below.

1. Whilst it will take some time for significant coverage of the energy performance of the Jersey property market to be developed, Skipton welcomes a start in this process. Such information will enable property purchasers and renters to make more informed decisions and better understand the cost of heating properties and their potential impact upon the environment. Also, once measurement is in place; government, lenders and the property sector will be in a position to make progressively better informed sustainability decisions
2. Skipton considers that EPC data should be made publicly available as in the UK (<https://www.gov.uk/find-energy-certificate>, <https://epc.opendatacommunities.org/>). Through an API linked to this data Skipton has been able to determine the current and potential energy performance of the properties on which our UK mortgages are secured. From this data Skipton is currently considering:-
  - a. Whether Skipton should continue to offer mortgages to properties that do not have potential to be upgraded to a minimum level of energy performance.

- b. The development of attractively priced mortgage products to assist existing mortgagors to improve the energy efficiency of their property, and hence positively support reductions in carbon consumption.
- 3. If Jersey EPC data was available publicly with a suitable API from which we could similarly interrogate then it would be Skipton's intention to consider similar developments for Jersey.
- 4. Given the quality of the UK database, the robust nature of the API and reduced complexity for service providers operating across Jersey and the UK (i.e. the major Jersey lenders) Skipton would recommend Jersey requests to use the UK database referenced in point 2.
- 5. Committing to setting legal requirements to reach minimum EPC standards at point of rental or sale for existing properties by 2026 could have unintended consequences for the Jersey property market.
  - a. It is, however, considered that minimum levels of EPCs could be introduced for the development of new build properties, as in the UK.
  - b. Jersey has a wide range of existing property construction types and property ages. It is likely that a proportion of properties, due their construction or other reasons will not have the potential to reach even mid-level, let alone higher levels of energy efficiency.
  - c. If existing properties could not reach the legally required minimums for sale what are the consequences? For example, could Jersey residents become trapped in energy inefficient properties as they age, economically unable to move to more appropriate accommodation in later years? If properties become vacant and cannot be sold will some be left to decay, providing yet further supply constraints on an already pressurised housing market?
  - d. If existing properties could not reach the legally required minimums for rental what are the consequences? Could this lead to a reduction in the supply of properties for rent, putting further pressure on rental prices and further disadvantaging those residents with lower income levels? Could a long term impact be a reduction in the available labour supply to the Jersey economy as overseas workers are unable to source affordable accommodation?
  - e. Listed buildings are less likely to be able to reach higher energy performance levels due to constraints relating to their listed status. Is it the intention to make such properties exempt, as in the UK?
  - f. Will a 'high cost exemption' be considered where improvements are not cost effective?
- 6. Skipton recommends that Jersey maintains an intention to legislate for minimum EPC levels for existing properties at some point in the future, but waits until it has a sizeable coverage of the current and potential EPCs of properties in each market to better understand any unintended consequence that might result. When sufficient EPC data is available a separate consultation may well be appropriate on this subject to specifically address the consequences that might result.

Word Count: 943

## Appendix 12.41: St Saviours School Eco Team written submission

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** 26 January 2022 16:21  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Roadmap feedback from St Saviour's school Ecoteam

Please find below the points made by St Saviour's primary school Ecoteam after viewing the draft roadmap.

#### Transport:

We would like a lot more cycle routes with trees to block out the rain so we can cycle when it's wet. Trees will also absorb carbon.

We want people to have help to buy electric bikes and scooters, not just cars. There are too many cars on the road already and it makes it hard for us to ride to school.

Please don't build any new roads.

Make petrol cars more expensive to buy so people will buy electric cars or bikes.

Make it easier for people to work from home so they don't have to drive so much.

Have minibuses to take primary school children to school so parents don't have to drive.

#### Heating:

People should wear jumpers instead of putting on the radiators

We should have more solar panels

Many Thanks,  
St Saviour's EcoTeam

## Appendix 12.42: Sun Works (C.I) Limited written submission

### FOR THE ATTENTION OF THE ENVIRONMENT MINISTER

#### Comments on Carbon Neutral Roadmap from Sun Works (C.I.) Ltd

Contact [REDACTED]

#### Enabling Policy EN2

The whole CNR document is predicated on the status quo of a continuation of the current low-carbon electricity supply from the European grid. There is no Plan-B for Jersey not having the access it currently enjoys when existing supply contracts run-off. With an increase in external political factors (and eventually costs, as safety upgrades to nuclear reactors work through), the security of our electricity supply and contingency plans should be a central consideration of the CNR.

With some foresight, significant steps could be made to plan for more locally sourced low-carbon electricity supplies i.e. Solar, wind, tidal, Energy from waste, anaerobic digestion etc. This would defray the environmental costs of the current alternative which is burning diesel oil at La Collette. The fact that there is not a policy section in the CNR on renewables is surprising given that the need to urgently develop more renewable energy resources has featured at every recent COP for the last 10+ years. It should also be mentioned that every unit of electricity generated from renewable sources in Jersey, means that unit is not imported and therefore available to somewhere that would otherwise burn fossil fuels to generate it. This is a global problem and Jersey ought to be adding to the world's supply. The most appropriate place for this to be included would be the Enabling EN2 section.

A Carbon Neutral Alliance should be created as a body supporting future businesses/entrepreneurs to develop technology solutions towards Carbon reduction and electricity supply resilience. This Alliance ought to be an outward thinking body (unlike the Jersey Energy Forum) and should focus on the bigger picture around the provision of locally generated low-carbon electricity sources, as well as looking around global carbon offset validity.

288 Words

#### Policy OE1 'Supporting Low Carbon Lifestyles'

*We know that a household producing its own power from the sun and watching its 'second by second' generation and usage, very quickly becomes conscious of where its consumption arises and changes its daily domestic habits (when you charge the EV, put the dishwasher on. We therefore think that adding a policy of including solar micro-generation into all eligible new builds would undoubtably drive energy reduction through better use and management of electricity within the premises. This would have the added benefit of educating the next generation in this area.*

90 words

#### Transport Policy

##### TRI - Speeding up adoption of electric vehicles

We do not support the subsidy on only new EV's up to £30k because there is a dearth of those.

A more environmentally friendly policy would be to include second-hand EV's (both cars and vans) which are effectively being recycled and have had much of their environmental manufacturing overhead already written-off.

### TR7 – Green Number Plates

This is a positive step in making the cultural shift that is needed, but could go further in the colour spectrum. Why not 'amber', 'brown' or 'black' number plates based on emissions/weight (but exempting commercial vehicles on availability grounds)? This would take a long time to achieve in conjunction with the upcoming MOT test, but even the threat of it may see a surprising exit high emission vehicles propelled by their perceived future loss of resale value.

A further action under this heading would be to ensure company owned EV's also qualify for parking concessions.

Finally JE ought to be tasked with introducing an off-peak tariff for charging EV's.

172 words

## Appendix 12.44: The Good Jersey Life written submission

### FAO Minister for the Environment

Please find below my submission on relevant parts of the draft Carbon Neutral Roadmap

#### General overarching comments

##### SP1 - Jersey's net-zero emissions pathway

I am pleased that the island intends to secure the extension of the Paris Agreement on Climate Change to Jersey, ensuring that Jersey leads by example on the global stage. Small in land mass but big on ambition.

The policy doesn't give information on how far the island has already come since 1990 – it would be good to give people an understanding that we're not just at the start of the journey, but have made significant progress aiming for the original Paris Agreement timeline of 2050, in the context of this document, by including the reduction made from 1990 to date.

##### SP 2 – Island Energy Market

I appreciate the delicate balance that is played out in the local energy market but feel that the dependency on a single electricity supply for the majority of the island's energy needs makes us exceptionally vulnerable – especially given the recent posturing by some French government ministers.

Whilst I understand the electricity supply is stable until end of the existing contract in 2027, I am concerned that we have little energy sovereignty and Jersey should look to widen options for securing renewable energy – working with the other channel islands, investing in infrastructures projects such as the large wind turbines going up offshore, ensuring that new builds are required to host solar panels etc.

I appreciate the Government will work with JEC on a review of the energy market requirements, but have concerns as to whether the current on-island infrastructure exists to support this rapid decarbonisation of transport, heating and cooking, and whether the existing cables to France have sufficient capacity to meet that demand.

##### SP5 – Becoming carbon neutral

Under 3.4 Principle 4 I note that the Government will ensure that 'everyone can play their part'. I believe that businesses form a large proportion of where changes should be made.

In the same way as traders with a business license are required to prepare accounts to show their financial position, I believe it should be a requirement for businesses to also be required to calculate their carbon footprint. Initially this should be Scope 1 and Scope 2 only – but in time I would expect this to expand to Scope 3 as access to accurate data becomes more available.

This does not need to be an expensive exercise for businesses as the Eco Active business energy monitoring spreadsheet is already created and in use.

Being a mandatory requirement to calculate means that businesses will be able to understand their footprint and easier able to plan a programme of reduction on their journey to carbon neutrality.



I welcome the commitment to local reduction and sequestration projects before the purchase of off-Island offsets and feel that there is enormous scope for both terrestrial and marine sequestrations, which will also tackle the biodiversity crisis at the same time.

## **Comment on Policy Pack**

### **TR0 -Transport policies**

#### **TR1**

I agree that as transport emissions are Jersey's largest emissions that the speeding up of decarbonisation of vehicles has to be a main priority for the government. I recognise that this policy isn't intended to switch all existing fossil fuelled vehicles straight over to electric cars, but that the Sustainable Transport Policy will run alongside this and investigate getting people out of any type of car and into sustainable methods of travel.

My main concern is that the policy makes no mention of how the electric batteries will be dealt with at the end of their useful life. The journey to net-zero should include the consideration of a circular economy at best, or at least divulge how the batteries will be treated at end of life, based on existing technologies (as well as the expectation that there will be technological advances in the intervening years.).

#### **TR2**

Please can you confirm if the incentive will be available:

- for multiple vehicles in single ownership. I.e – if you have 2 or 3 vehicles can you scrap them all with the incentive given for each car (if it meets the criteria)
- to businesses to enable them to scrap fleet vehicles and receive the subsidy.

I believe it should be made available in both scenarios – the end result being still that older, more polluting vehicles are taken off the road.

#### **TR5**

There is no reference to exceptions in terms of classic cars. Is it the intention to disallow classic vehicles completely from 2030?

### **HT0 – Heating Policies**

#### **HT1**

This policy is headed up low carbon heating systems and home insulation, however all the underlying policy relates to heating systems only, with no further discussions around home insulation and how the government intend to support more homes/businesses being suitably insulated.

#### **HT3**

I note that there is the intent to introduce new legislation to make energy efficiency, carbon assessments and minimum standards mandatory at the point of sale or rental, and this is welcomed.

There will need to be a process whereby planning and building control consider this in the context of listed or heritage buildings which by their very nature are protected and may not be able to carry out efficiencies (windows etc)

## **OE0 - Other on/off island emissions**

### **OE1**

I am especially interested in the education and engagement programme to help islanders reduce their Scope 3 emissions. I believe there is a real disconnect between our purchasing choices and the resulting impact on the global environment.

One key area to be covered by an education and engagement programme is the sustainability of our food – and the importance of buying locally and seasonally. There is a real balance between local suppliers ensuring they create sufficient products for the local market, but there must also be the matching demand locally by consumers. I understand we currently export most of the produce grown and import most of the food consumed – and if we are to reduce our carbon footprint then this must be addressed. As such I feel that the education and engagement programme should not be just for consumers, but producers too. – so that we can all be part of the solution.

Another key issue I feel should be addressed is the consumption of single use items on the island. Although the plastic/paper bag ban comes into effect in July I believe that the Single Use Plastics etc (Restrictions) (Jersey) Law 2021 should be extended to cover the wider extent of single use items in use (paper, plastic, wood etc) and we should no longer allow a throw-away culture – if we truly want to promote a low carbon lifestyle.

### **OE4**

I welcome the commitment for a new net-zero Waste Strategy. One of my biggest issues with the current system is the lack of consistency across the island in terms of recycling. We do not have parish level systems for water, sewage, hospital etc but we do for waste management. The current model of waste management across the parishes is inconsistent and can be confusing (eg bottle tops off on all parish kerb side collections, all island-wide bring banks and at la Collette, but left on in St Helier and St Saviour kerb side collections only; aerosols collected in some but not others; glass collections variable across the island) and there is the unending myth that materials collected for recycling are not even recycled.

I support the Guernsey model of waste management – a ‘polluter pays’ system whereby all black bag waste is charged a collection fee, but recycling is free. This model also operates successfully in Switzerland. I don’t feel it fair that waste charges are being levied just at commercial waste – if we want to make island wide behavioural changes then we must tackle both domestic and commercial waste.

I also welcome the commitment for a net-zero water management strategy. I hope that part of the strategy is education around the potential for grey water uses, and hopefully a way for those domestic or commercial premises that do implement grey water systems not to be charged for water treatment at the same level as water supply.

## **EN0 - Enabling Policies**

### **EN2**

I welcome the creation of a Carbon Neutral Alliance and the Climate Action Fund. I think it's an excellent concept, but I am concerned that it is insufficiently funded.

### **EN3**

I especially welcome the local market supply chain audit with gap analysis.

I note the intention to ensure there is access to low-carbon products, however one area of concern is the potential for greenwashing where customers believe they are purchasing goods or services which they believe to be lower carbon or sustainable but aren't on fuller investigation.

I think that it is imperative that individuals and businesses can identify the environmental credentials within the supply chain, potentially through existing certification programmes such as Eco Active, or other international accreditations (ISO 14001, B Corp, Global Sustainable Tourism Council, Green Kitchen Standard etc)

The Good Jersey Life -Sustainability Consultant

Word Count: 1500

# Appendix 12.45: The Jersey Estate Agents' Association written submission

**From:**  
**Sent:**  
**To:**  
**Cc:** JEAA President  
**Subject:** RE: Estate Agents and the draft Carbon Neutral Roadmap

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation response

As discussed, the JEAA (The Jersey Estate Agents’ Association) fully supports the idea of EPC’s becoming compulsory, however following our conversation, and further conversation with my JEAA colleagues, subject to the implementation being similar to those requirements currently in force in the UK.

With EPC’s required for marketing a property for sale, it may encourage homeowners to improve the energy efficiency of their properties, raising overall standards, it may also provide sellers and buyers with a better understanding of any improvements which could be made by the new owner following the sale of a property.

For rentals, we do not feel EPC’s being required would have a negative impact on landlords, given that they would be proposed to be required for Landlords, again having discussed with my JEAA colleagues, subject to the implementation being similar to those requirements currently in force in the UK.

Kind Regards

# Appendix 12.46: The Jersey National Park written submission

To the Minister for the Environment

## Comments on the Carbon Neutral Roadmap

### General Submission

28 January 2022

The Jersey National Park wholeheartedly supports efforts to reduce carbon emissions and moves towards a net zero position for Jersey. On that basis, Jersey National Park endorses overall the proposed policies set out in the Carbon Neutral Roadmap. However, the following comments are made in relation to some of the specific policy proposals, primarily by [REDACTED] Jersey National Park [REDACTED] :-

### Transport

#### TR1 Speeding up adoption of electric vehicles

Financial incentives to help people move from fossil fuelled vehicles to electric is supported. However, why is this limited to only 1,606 vehicles equating to only 400 per year? There are thousands of cars on the roads of Jersey and a greater incentive package is needed. The electric car is a viable 'green' alternative to petrol and diesel but hydrogen cell vehicle technology is steadily developing. It is disappointing there does not appear to be any recognition of electric-alternatives in the transport section of the Carbon Neutral Roadmap.

#### TR3 Supporting transition fuels

The inclusion of second generation renewable diesel (SGRD), which we understand to be a plant-based biofuel, in the strategy to zero carbon is supported and welcomed. Rubis Jersey has confirmed their SGRD biofuel, already currently available in Jersey, does not require any conversion work to a vehicle's engine in order to be used. This enables an immediate and low cost adoption of an alternative to fossil fuel. When electric cars are so expensive, and out of reach financially for most, this is an immediate solution for the majority of Jersey motorists to be able to contribute to reducing Jersey's carbon emissions. Consequently, it is disappointing that TR3 limits the financial incentive to 32ppl, that it does not commence until 2023 and only lasts until 2026. Furthermore, that there will still be a price disparity to normal fossil fuel diesel is a further disincentive to switch to a more environmentally friendly option. Continuing to use an existing vehicle, but running it on biofuel, will be near to zero carbon, compared to a new electric vehicle that creates a large carbon footprint when it is manufactured, and causes substantial environmental impact from the mining of lithium, a relatively scarce resource globally.

We would like to see, at a minimum, price parity on SGRD and fossil fuel diesel, and that such a policy continue beyond 2026. However, Jersey should consider the move to only supplying biofuel diesel instead of normal diesel. With so many diesel vehicles on Jersey's roads, it would be a lasting contribution towards Jersey's zero carbon target.

#### TR4 Vehicle Emissions Duty incentive

The proposed dispensation of Vehicle Emissions Duty on electric vehicles should be extended to used diesel vehicles imported to the Island using SGRD biofuel. A new electric vehicle creates a large carbon footprint in its manufacture, similar to a fossil fuelled vehicle of similar type. Using biofuel in an already manufactured vehicle avoids the additional carbon emissions.

#### TR7 "Green" number plates for electric vehicles

Green number plates could be seen a discriminatory to those unable to afford the change to an electric vehicle. The incentive should be expanded to those motorists using SGRD biofuels, which would be all diesel vehicles if the comments under TR3 were adopted.

## **Heating**

### **HT1 Supporting low carbon heating systems and home insulation**

This proposal is supported, but there is not enough funding allocated, given the statistic quoted for the number of fossil fuelled boilers on the Island. Why only 998 boiler replacements covered under this proposal when there are estimated to be 21,559 fossil fuelled boilers in use? The financial incentive support needs to continue beyond the next 4 years.

The proposals in HT1 do not include the use of biofuels in existing boilers currently using fossil fuel. It is a relatively low cost for the conversion of existing boilers to use biofuel products currently available on-Island like Rubis Jersey's Ecoheat 100. This option would provide immediate lowering of carbon emissions output and should be encouraged to homeowners, at least until their boilers need replacing. Similar to comments made for TR3 above, the cost of Ecoheat 100 is substantially more expensive than fossil fuel equivalents, due to fuel duty levied by Jersey Government. It is recommended the duty is removed, to incentivise behaviour to reduce carbon emissions, and in a far shorter time period than waiting until boilers need replacing years into the future.

### **HT2 Update building bye-laws**

The proposal for new buildings is fully supported. Will this incorporate the use of renewable energy solutions as standard, rather than property owners being required to use electricity supplied from the JEC?

In relation to existing buildings, it is not stated whether the installation of renewables is supported and encouraged by Government. However, we recommend that such incentives be included as part of the policy, to include attractive financial incentives to motivate change. Solar and heat source (air and ground) renewable energy solutions should be encouraged, and less reliance on the part-Government owned electricity company and supplies from France. Where renewable energy technology is installed on existing buildings, battery storage should be encouraged wherever possible. However, there is currently too much disparity between the unit cost of electricity from the grid (JEC) and the buyback rate for excess electricity generated by property owners. This should be addressed.

## **Other on and off-Island emissions policies**

### **OE2 Construction sector emissions**

The reduction of emissions as set out in this policy proposal is supported. To aid the proposal, we recommend that serious consideration be given to incentivising the building of eco houses. These are houses which are pre-constructed off-site and then flat-packed and delivered to site. Construction time is significantly reduced and consequently the traffic carbon footprint. In addition, the extraction of raw materials for building products like sand and cement are substantially negated.

### **OE3 Agricultural Sector emissions**

The development of a net zero Rural Economy Strategy is welcomed and supported. We recommend that financial information including incentives and level of Government support be specified in the 2022 plan.

### **OE4 Emissions from waste and water management**

We recommend that the strategy includes the creation of a closed facility to compost "compostable" products rather than dump into the main waste stream. Environmentally-conscious consumers are increasingly encouraged from seeing products made from recycled materials or which can be composted. However, the current composting facilities in Jersey do not enable compostable packaging, eg, coffee cups, to be composted and are disposed of into the main waste stream. If Jersey is serious about waste reduction and the modern concepts of the circular economy, initiatives such as introducing a closed composting facility are required.

Some emissions from waste management can be attributed to the thousands of individual car journeys undertaken by Jersey residents to the La Collette recycling centre and garden waste facility. It is recommended that an Island-wide kerbside recycling service should be established, instead of piecemeal parish by parish arrangements, which in general are still limited in the types of segregated waste collected. Individual households make their journeys to collection points (which only facilitate limited types of recycling) and these significantly increase road traffic and carbon emissions.

The publication of a net zero strategy by 2025 is too long away and should be delivered within a year's time in 2023.

### **Enabling Policies**

#### **EN5 Blue carbon, biodiversity and sequestration**

The potential for sequestration of carbon emissions in the marine environment is supported in principle. A Marine Spatial Plan would need to ensure that analyses were made of the biodiversity and environmental impact for any marine site selected for blue carbon.

Contact details for further correspondence are:-

Jersey National Park

Word count: 1277

## Appendix 12.47: The Jersey Old Motor Club written submission

# Jersey Old Motor Club



**Founded 1966**

Patron: His Excellency the Lieutenant-Governor of Jersey Air Chief Marshal Sir Stephen Dalton.

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January 19<sup>th</sup> 2022

Minister for the Environment  
States of Jersey

By email to [climateemergency@gov.je](mailto:climateemergency@gov.je)

Dear Sir

**Carbon Neutral Roadmap consultation (the ‘Consultation’)**  
**Transport emission reduction policies (‘TR’)**

The Jersey Old Motor Club (‘JOMC’) is, as the name suggests, a Jersey based Club which promotes interest in historic motor vehicles and particularly those registered prior to 1951 (‘Historic Vehicles’).

We have reviewed the TR in the Consultation and we are concerned that they do not accommodate the continuation of this objective and if adopted in their present form will actively lead to a reduction in the number of Historic Vehicles in the island.

In particular, we note that section TR5 of the TR records the end to the importation and registration of petrol and diesel vehicles that are new to the Island from 2030, which if adopted in its suggested form would mean that no Historic Vehicles could be imported to the Island after that date.

Additionally, section TR4 of the TR proposes an increase in the vehicle emissions duty (‘VED’) on all domestic petrol and diesel vehicles each year until at least 2030. Currently, and in recognition of the importance to our transport heritage, there are special exemption provisions from VED for vehicles of over 25 years old, and we would advocate and request the continuance of these exemptions.

As indicated above, Historic Vehicles are an important part of our heritage and the carbon footprint of the average historic vehicle is very low; in the U.K., for example, research has shown that the historic vehicle community accounts for less than 0.25% of the total miles travelled on UK roads annually, and although there is no similar research carried out in Jersey (as far as we know), we would anticipate that similar data would apply locally. Further, the manufacturing footprint of such vehicles has already been spread over many years, and as such they have ‘paid their dues’ in terms of emissions and energy required to produce them.



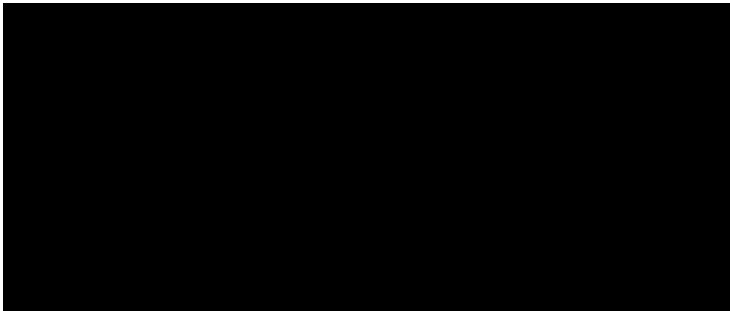


These Historic Vehicles are an important part of island commemorative events, including displays on Liberation Day and for example this year will also be included in Her Majesty the Queen's Platinum Jubilee Celebrations; a number of such vehicles in the JOMC were in the island during the Occupation and form a colourful display at such events which are appreciated by the Public.

In recognition of its environmental responsibilities, the JOMC is currently examining carbon balancing initiatives by which a programme of tree planting is instituted to offset the carbon footprint from emissions from Historic Vehicles. It is recognised that such a programme will need to be scientifically sound and have a tangible impact on the environment.

Based on the above, we would ask that consideration is given to exempt Historic Vehicles from the restrictions under TR5 from importation into the island after 2030, and also to continue the exemptions from VED for Historic Vehicles under TR4.

Yours faithfully



President – Jersey Old Motor Club

Word count 530

## Appendix 12.48: The National Trust for Jersey written submissions

### **CARBON NEUTRAL ROADMAP CONSULTATION - HEATING POLICIES**

#### **7.24 Reducing demand for energy in buildings**

There is no acknowledgement that increasing energy efficiency in historic buildings may prove challenging and that some dispensation maybe required to ensure that the historic significance of buildings is not unduly compromised such as alterations to historic windows.

The Trust would question the need to undertake an energy efficiency assessment every time a new lease is issued for a rental property. If the building has not changed since its last assesment it is difficult to see what benefits would be accrued other than additional bureaucracy and unnecessary expense. Would it not be preferable to request a new assessment to be undertaken if any physical alterations have been undertaken since the last lease similar to the current Parish rates assessment form. This would still enable EPCs to change and reflect those buildings that are on a continuous path of improvement.

#### **7.26 Switch to low carbon energy sources**

The Trust does not understand why the installation of new fossil fuel boilers could not be cease much sooner than 2030 and would suggest a target date of the end of 2025. This would reflect the proposed building law amendments highlighted under HT2.

#### **Heating HT1**

The Trust believes this subsidy should have an extended period of implementation as it is unlikely that the manpower resources and expertise are available to implement this at such short notice. As a result, the proposed subsidy could be heavily eroded by inflationary pressures.

#### **HT2 – Update building bye-laws**

The Trust believes that the policy should acknowledge the challenges presented by historic buildings and that it is paramount to protect and conserve historic significance.

#### **Energy Performance Certificates HT3**

Please see comments under 7.24

Word Count 280

## **CARBON NEUTRAL ROADMAP CONSULTATION - TRAVEL POLICIES**

### **7.6 Reduce the need to travel**

Regrettably the Trust considers that little consideration has been given to recreational/leisure journeys and how this might be actively addressed. A comprehensive householder survey would help identify why people make such journeys and would be able to help inform future travel policies. For example, do we have a sufficient public transport network to our beaches/coastline/out of town retail facilities? Should provision be made within buses for carrying larger items? It is hoped that these key issues will be actively addressed in the forthcoming sustainable transport policy

Also the Trust considers that intelligent delivery services should be afforded greater attention and potential investment. During Covid delivery services became second nature for certain food retailers and there is a real opportunity to build upon and develop this fledgling initiative in partnership with the likes of Digital Jersey, Jersey Post and Jersey's Chamber of Commerce.

### **7.10 Shifting journeys to less carbon intensive forms of travel**

The Trust welcomes the ambition, but it should be acknowledged that cycle travel will only be more widely adopted if safe cycle routes are provided. This requires significant investment as well as over-riding commitment to deliver projects for the benefit of the majority even if this requires statutory intervention. The cycle path at St Peter's Valley is a good example of what can be achieved and looking further afield the cycle networks that have been established in small islands such as Ile de Re are a valuable exemplar.

### **Practical Considerations P60**

The Trust would question the statement "that electric cars will be limited or non-existent until the necessary charging infrastructure is in place". Whilst charging infrastructure will be necessary the Trust does feel that this is often over-emphasised as a particularly large hurdle for a transition to electric vehicles. Most cars will be charged on a weekly basis at home and the necessary infrastructure can be installed relatively easily. It may be more challenging to install charging points for shared parking spaces and apartments, but it is not insurmountable especially as charging speeds will increase rapidly over the next few years.

### **Transport Policies TR2**

The Trust believes that aviation and marine fuel, particularly in relation to private leisure activities, should be taxed in collaboration with Guernsey and this should be done in an incremental manner to facilitate an appropriate transition period.

The Trust also feels that greater consideration needs to be given to the importation of goods and in particular whether there should be an increased emphasis on procurement of goods from the continent as opposed to the UK mainland.

### **TR2 – Vehicle scrappage incentive**

The Trust believes consideration should initially be given to limiting this incentive to one vehicle per household to ensure greater equity and avoid scrap vehicles being traded to secure green credits

### **TR7 – Green Number Plates**

The Trust would question the value of this initiative in terms of seeking to positively engage and encourage all sectors of society to be part of the Island's journey towards carbon neutrality.

## **CARBON NEUTRAL ROADMAP CONSULTATION – ENABLING POLICIES**

### **Strategic Policy 1**

It would be helpful if it could be clearly stated within the policy how much we have already reduced our emissions in 2022 as compared to the 1990 baseline as opposed to simply stating that we need to reduce them by 68% from 1990. Otherwise, the target is unclear and does not provide a guideline in terms of future achievement.

Equally if Jersey can reduce its emissions by a further 10% between 2030 and 2035 then this would suggest that it would be possible to achieve 12% within 10 years namely 2045 especially given the technological advances that will have occurred during that time. Jersey should not feel it is wed to international or UK targets but indeed should aim to exceed those targets where practical and feasible to do so.

### **Strategic Policy 2**

It is disappointing to see that there is no recognition of the benefits to be secured by working with our immediate neighbours to deliver a sustainable, secure and affordable energy market. By sharing and developing resources both in terms of renewables, technology and infrastructure there is a real opportunity to deliver an energy framework for the Channel Islands as a whole, which would potentially enhance purchasing power, mutual co-operation and energy sovereignty in the longer term.

The Trust considers that it is important to acknowledge that whilst benefitting from low-carbon energy from France this also comes at an environmental price given the nuclear waste legacy.

### **Strategic Policy 3**

4.21 The Trust would question the suggestion that such investment by this generation should be viewed as solely benefiting future generations. Some measures will have immediate benefits as clearly illustrated throughout the strategy document including addressing fuel poverty and improving our environment on many levels

It would be helpful to have an indication as to the potential income to be generated from the proposed new economic instruments. Otherwise the public is none the wiser as to the value to be accrued and therefore it will be difficult to win support for such initiatives.

The Trust also believes that aviation and marine fuel should be taxed in collaboration with Guernsey and this should be done in an incremental manner to facilitate an appropriate transition period.

### **The Roadmap**

Page 42 - The Trust believes that it is crucial for the roadmap delivery plan to be updated and reviewed on an annual basis given the urgent need for substantive progress and the regular need to review technological advances. This would also reflect that Jersey GHG emissions are calculated on an annual basis. This strategy must not be subject to the political cycle and the Trust is of the view that progress should be reviewed by an independent advisory body similar to the Fiscal Policy Panel which would provide the Environment Minister and States Members with advice and recommendations regarding Jersey's progress towards carbon neutrality. Such a body could also be charged with reviewing the Island's environmental achievements in four other core areas as advocated by Earthshot namely:

Protect and Restore Nature  
Clean our air  
Revive our oceans  
Build a waste free world

The Panel could comprise 5 experts to reflect the five core areas. The Panel would be paid in a similar fashion to the Fiscal Policy or the Architecture Commission and could be funded by the Climate Emergency Fund or a private benefactor thereby not requiring additional budget spend.

#### **Decarbonising Government and Create a Carbon Neutral Alliance EN1 & EN2**

It is disappointing to see the disparity between the funding allocated to Government and the Climate Action Fund. It would be helpful to see how the figure of £500,000 was calculated given that this will be applied to projects across the whole of the Island including the charitable sector.

#### **Delivering the COP26 education pledge EN4**

The Trust welcomes a review of the quality and effectiveness of climate change education by July 2022 and enhanced training for schools. It is felt that the inclusion of an independent party in the review process is important, and that any improvements to climate change education should be embedded into both the Primary and Secondary School science curriculums. We recognize the support of ECO schools, however without being a curriculum requirement, climate change education may end up being marginalised in favour of other mandatory subjects.

It is important that the findings from the study referenced in 'The Carbon Neutral Roadmap and the Children and Young People's Plan 2019-2023: The Children and Young People's Plan', of the areas young people would like to see further education in ('the potential impacts of climate change in Jersey, why it is important to take action, and most importantly what changes and actions can be taken by individuals to reduce their carbon footprint') are kept at the forefront of the review, so that the Island's young people's specific climate change education needs are a part of the curriculum, in turn ensuring all schools focus on this.

As one of the 4 Outcomes in the Plan is 'Be Valued and Involved', it is important that the roadmap and resulting policies that directly or indirectly affect them are disseminated via teachers. Therefore, this should be included in teacher training, and possibly added to all KSs within the Jersey PSHE curriculum.

#### **Blue carbon biodiversity and sequestration EN5**

The Trust very much welcomes this policy but would also like to see a commitment to protecting our existing blue infrastructure as a whole and not just focusing on sea grass beds. Other seaweeds including kelp also have the ability to absorb significant carbon and should be duly recognized.

The Trust would also like to see a recognition of the value of restoration for addressing the biodiversity crisis as opposed to simply focusing on protection. The National Parks in the UK are a good example whereby landscape protection has been delivered over the years but little biodiversity enhancement. Restoration projects could be applied to both terrestrial and marine landscapes.

985 words

31<sup>st</sup> January 2022

J Young Esq.  
Minister for the Environment  
Government of Jersey  
Broad Street  
St Helier  
Jersey C.I.

Dear John

**The Carbon Neutral Roadmap Consultation**

The National Trust for Jersey very much welcomes the draft roadmap and the drive towards carbon neutrality. Having reviewed the document the Trust made a number of specific submissions as required under the consultation framework.

In summary the Trust truly hopes that its submissions are seen as being constructive and useful in helping the Minister to finalise this incredibly important strategy. Whilst much emphasis has been placed on reaching targets for carbon neutrality, it is also absolutely crucial that Jersey's Government is able to convey a positive vision for this strategy which illustrates the myriad of additional environmental benefits to be secured including cleaner water and air, better health, eradication of fuel poverty, restoration of biodiversity, increased leisure opportunities, reputational enhancement and reduction in road noise to name just a few. Hopefully this will help to illustrate that the required investment is not solely about reaching carbon neutrality, which some will consider to be an intangible and meaningless target, but rather investing and improving our Island's environmental infrastructure for both this generation and those who follow on.

Yours sincerely



 **The National Trust for Jersey**

## **CARBON NEUTRAL ROADMAP CONSULTATION – OTHER EMISSIONS**

### **Figure 19 Other Emissions**

Blue Carbon – The Trust does not consider it is satisfactory to continue to explore the potential for blue carbon for the next 8 years and only start to protect, enhance and expand marine sequestration and biodiversity from 2030 onwards. Such a journey fails to acknowledge the current biodiversity crisis that we are facing as well as the significant threats our marine environment faces from inappropriate activities.

Given that the marine spatial plan will be completed by no later than the end of 2023 the Government should then be able to introduce scientifically based management measures to protect and enhance our marine resources including sequestration opportunities. The Trust is of the view that this could be delivered either through the designation of a Marine Park or a network of Marine Protected Areas equivalent to 30% of Jersey's territorial waters.

The Trust therefore considers that Figure 19 needs to be duly amended with work on protection, enhancement and restoration reflecting the work on the spatial plan as well as Bridging Island Plan policies..

Agriculture – The Trust believes that the agricultural sector will need to implement new agricultural practices well before 2030. It is foreseeable that some food products will start to have carbon labelling within the next 3 to 5 years (see text for scope 3 emissions) and therefore it is crucial for the industry in partnership with Government to seek to reduce their carbon footprint at the earliest opportunity. This is particularly pertinent for high quality niche products which wish to maintain the integrity, value and desirability of their brand.

Word Count 263

## Appendix 12.49: [Redacted business 1] written submissions

**From:**

**REFERENCE: TRANSPORT POLICIES**

**Total words: 1023**

[Redacted]  
[Redacted] Gardening  
Services Limited

**Mobile:** [Redacted]

**Email:** [Redacted]

Dear Minister for the Environment,

I write to you as a motivated business owner wishing to improve the carbon footprint of my business through changing the main operating vehicle of my business.

I wanted to make some comments based on my observations and experience in recently trying to change my diesel engined light commercial vehicle.

### **History:**

I imported a UK registered 2006 commercial tipper truck 3.5t GVW in 2018 paying the VED, GST and any other fees due for the importation of the vehicle. The CO2 figures were not printed on the V5 (UK) registration document so the VED due was calculated based on engine capacity; this was cheaper than paying based on the actual CO2 figures which would have been the highest, or second highest band of CO2 assessment.

### **Current:**

Given the focus on carbon emissions I want to make a conscientious decision and switch to a greener, cleaner more efficient lorry.

### **Observations:**

1. I cannot find a fully electric tipper truck in the UK. This would have been my preferred solution.
2. There are no current hybrid engined vehicles in the configuration of a tipper truck that I can find. I have however ruled out a hybrid since I feel it would be a 'half way house solution'; it will still emit carbon through the petrol engine and be likely taxed on road use in the future (sic for my use of the word 'tax' here). Incidentally hybrid vans seem to be around £50,000, some could be found cheaper possibly. This would simply be too expensive for my business.
3. I could purchase an electric van and tow a tipping trailer but my carrying capacity would be less than a diesel truck and my overall vehicle length increases to around 9m which would be too cumbersome for Jersey lanes and for access to customer properties.



4. My choice now falls to a Euro6 diesel engine (the latest standard of engine manufacture in terms of cleanliness and emission) **my research shows that these vehicles emit near identical levels of CO2 figures as my year 2006 vehicle.**
5. UK (right and drive) vehicles quote ULEZ compliant engines but I don't know if I should be paying attention to this given it is not measured, or taxed or charged for use either on Jersey roads or at the point of importation into Jersey.
6. Effectively there is no incentive to import the latest version diesels over older diesel models.

### **Conclusions:**

1. For carrying large payloads the market wants me to use a diesel tipper truck (there simply isn't the choice available).
2. **It is a falsehood that new green diesels in this truck category (3.5t GVW) are better if you look just at the CO2 figures. They emit the same CO2 as 10 to 15 year old vehicles (given they still emit at the manufacturers specification).**
3. New and nearly new vehicles have systems to burn fuel more cleanly and reduce other pollutants. There is no encouragement to select these vehicle locally.
4. Because I am a commercial user I am likely to be targeted for paying for road use. I will have to pass this on to my customers.
5. A replacement new diesel tipper truck is c.£30k-32k which is a very significant spend for me and for which I may have to pay more to use on local roads
6. I see numerous new powerful sports cars and luxury vehicles on the roads that don't serve a purpose other than commute to work, or ferry one or two people around the island. My vehicle may well be targeted as an easy target since it is diesel but it is performing a function that is absolutely necessary to my work, and I can't choose an alternative at present.

Sadly it doesn't add up for me change this vehicle as in the medium term there may be better solutions for me. It is also going to be a very expensive process for me which I will need to finance and may adversely affect my business and my income.

### **Further to the above:**

During this search I have requested advise and assistance from Eco Active and the Climate Conversation groups and no one has got back in touch. There are no phone numbers for the teams.

I feel concerned legislation may be aimed at me without consideration of the situation I find myself in despite the fact *I am a motivated vehicle user wanting to change.*

In light of being unable to make an immediate change I have chosen to invest in updating my current vehicle by replacing (expensive) engine components to ensure the vehicle runs closer to the original manufacturers' specification. I feel this is a step in the right direction.

I would not want to necessarily scrap this vehicle in the short term.

We need to give some thought to the efficiency of any vehicle on our roads given our maximum speeds are often at 20 or 30mph and understand that the mpg quoted as 'Urban', 'Extra Urban' or 'Combined' is misleading for us we don't have an Extra Urban environment therefore we should really only take notice of the Urban mpg (and therefore emissions data).

If there are to be new charges levied on road users based on the amount of road use then you must take into account emissions made whilst vehicles are stationary. If it simply to be a measurement of mileage at the start and end of a period (1 year?) this would not reflect the time spent at traffic lights, in traffic jams or queuing when the engine is running. These engines may be at their most polluting if simply idling since complex computer management of the vehicle would effectively be off at this time.

Please can we think through how charges and changes may be made and understand that there may need to be a certain level of carbon emission that may, at the moment, be unavoidable and don't blanket charge for use.

Yours sincerely,

A solid black rectangular box used to redact a signature.

## Appendix 12.50: [Redacted business 2] written submissions

**From:** [Redacted]  
**Sent:** 24 January 2022 08:14  
**To:** [Redacted]  
**Subject:** CNR Heat Pumps

**Categories:** Consultation response

Dear [Redacted]

As a follow up from the [Redacted] meeting.

There was discussion about Heat Pump recommendation not being included as a result of an EPC.

Here is my understanding of how this works.

EPC recommendations are currently based on a cost improvement basis, with comparison between UK Electric and Gas usage prices and the UK Gas is cheaper than UK Electricity when the RdSAP tool was created.

The EPC recommendation model here is based on the UK and not on Jersey Electric and Gas prices for comparison.

As a result of the UK modelling tool, Heat Pump recommendations would currently be inappropriate.

The introduction of SAP 10 in mid-2022, and the subsequent version of RdSAP, will retain a SAP rating based on cost-effectiveness.

It is likely that SAP11 will switch from a cost-based rating to one which actually looks at the dwelling's energy use, this will be a major shift which will also likely see the introduction of a heat pump as an EPC recommendation.

There is an opportunity to tailor the recommendation for Heat Pumps to Jersey EPC's by Quidos adjusting the software fuel prices to match Jersey prices or change it now to dwellings energy use as suggested for SAP11.

I would hope there are a number of ways that Heat Pumps can be recommended as a result of a Jersey EPC, it's an opportunity missed without their inclusion.

Best regards,

[Redacted]

[Redacted]

## Appendix 12.51: [Redacted business 3] written submissions

[Redacted]  

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**From:** [Redacted]  
**Sent:** 31 January 2022 12:37  
**To:** [Redacted]  
**Subject:** FW: CNR ASHP Subsidy and Competent Installers

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation response

[Redacted]

---

**From:** [Redacted]  
**Sent:** 26 January 2022 22:29  
**To:** [Redacted]  
**Subject:** CNR ASHP Subsidy and Competent Installers

Dear [Redacted]

I would like to make a submission based on the installation work and subsidy for Air Source Heat Pumps.

With a grant/subsidy being provided to home owners to help cover 50% the cost (capped at £5k) of Air Source Heat Pumps (ASHP), I believe it is important to have in place a caveat attached to the grant scheme where only qualified competent installers be able to undertake the installation work for a claim to be made.

Installers will be required to join a Competent Person Scheme (CPS) that provides homeowners with an assurance of their skills and qualifications, that are necessary to join a CPS.

“Competent Person Scheme (CPS)” - The aim of the scheme is to provide certification for those companies that are, and continue to be, assessed as competent to install and self-certify that their Air Source Heat Pump installation work is compliant with the requirements of the current Building Regulations.

This will also ensure that the money spent will not be wasted on installers without the necessary skills or qualifications who will jump on the gravy train and install ASHP's with little or no regard to design consideration, suitability to property, home owners expectations, manufacturers installation instructions or notification to the Planning Department.

Number of ASHP installations will also be recorded by the notification protocol.

I am currently working with Highlands College to set up ASHP installation qualification courses, so training and qualification can be achieved on Island.

We hope to have this course and enrolment set up in the next six months.

Please don't hesitate to contact me if any clarification is required.

Best regards  
[Redacted]

## Appendix 13: Individual written submissions

### Appendix 13.1: Individual written submission 901

#### Climate Emergency

---

**From:** [REDACTED]  
**Sent:** 13 January 2022 20:07  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Roadmap

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I refer to the present consultation on the Carbon Neutral Roadmap.

I would like to make one observation on the proposal to “[End] the installation of new oil, gas and coal boilers from 2026 (we can still repair the boilers that are already in our homes).”

I have a four bedroom house built in 1952. I presently have an oil-fired boiler.

I recently obtained a quote to switch to an electric boiler. The quote came in at an extraordinary £12,500 (it included a requirement to upgrade to 3-phase electric power).

Compare that with the fact that I could replace my present 20 year old boiler with a new oil-fired boiler for about £2,000 or £3,000.

2026 is not very far away [REDACTED] then.

I think the roadmap needs to more realistic either about the timescale for phasing out oil-fired boilers (to give time for less costly alternatives to be developed – I gather hydrogen boilers are being trialled, for example) or to provide significant grants (although, presumably I would end up paying for that through taxation anyway!)

Or, adopt the more pragmatic approach the UK government is rumoured to favour (I believe), which is to ban new fossil fuel boilers only in new builds from 2025.

[REDACTED]

## Appendix 13.2: Individual written submission 902

### Climate Emergency

---

**From:** [REDACTED]  
**Sent:** 12 January 2022 20:23  
**To:** Climate Emergency  
**Cc:** [REDACTED]  
**Subject:** Reductions can not achieve Net Zero

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear GOJ

Your route to Net Zero is fundamentally flawed!

Reducing the amount of CO2 emitted into the atmosphere by instigating a subsidised package of replacing dirty energy with green energy cannot bring 420ppm of CO2 down to 270ppm, considered safe for life!

It's also the most expensive way to (fail) to meet Jersey's Net Zero and GOJ's SDG goals by 2030!

The best GOJ can do for our Island is to force financial institutions, pension funds, government departments and utilities, to issue climate-related disclosure and net-zero plans and let the marketplace do the rest.

You will not be alone the UK, USA and Canadian Governments already are committed because it makes GOOD COMMERCIAL SENSE!

Despite what some people say: the landmass of Jersey IS sufficient to retire more than Jersey's annual emissions if managed regeneratively to make Jersey Climate Positive. (4per1000)

The indications are Jersey would attract green finance while mitigating the worst impacts of climate change if a drawdown rather than; a reduction strategy was championed!

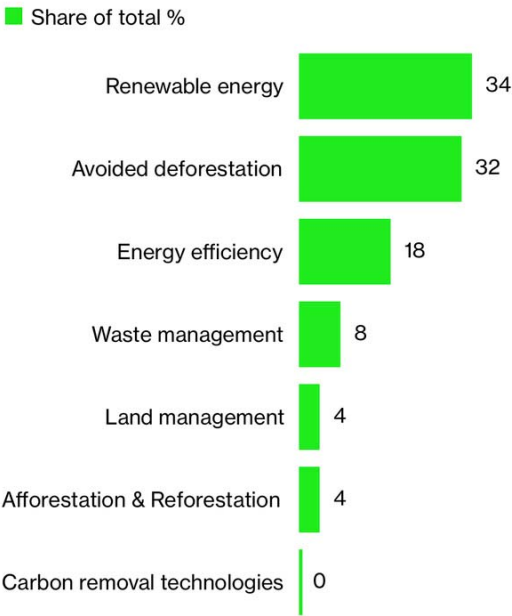
Until this happens, the marketplace will remain at odds with Government policy!

Kind regards

[REDACTED]

**Paltry Offering**

Less than 5% of offsets actually remove carbon dioxide from the atmosphere



Source: TSVCM inventory analysis for 2020  
Note: Avoided emissions credits prevent hypothetical polluting activity

## Appendix 13.3: Individual written submission 903

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** 30 December 2021 18:24  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Strategy

You asked for comments on the strategy. Here are a few thoughts and suggestions.

1. A good and helpful document but given that Government have always been much better at Planning than implementation, we must await the proof of the pudding.
2. Transport
  - Surely just green number plates are insufficient. We are trying to change culture here and we need to play the guilt card and in conjunction with MOT introduction, every vehicle by Law needs to display an official number plate/sticker/badge which charts its degree of greenness and starts at black. We will know we have got there when children beg their parents not to take them to school in the 'embarrassing' Grey number plated Range Rover ("please can we go in the Zoe or walk!!"). This action point ought not to stop after 2022 – it needs more thought than that.
  - I don't think incentives for just new EV's are a good use of money. This will just magnify the 'have's/have not's argument in terms of who can afford a new EV. A used EV is a more environmentally valid choice because it is being recycled having already had some of its manufacturing costs amortised in carbon terms. If there has to be a subsidy (although I think it interferes with the market), it should equally apply to used vehicles.
  - The existing free parking concession for EV's does not extend to company owned vehicles. Somebody has therefore made the call that company vehicles don't pollute as much as private ones. Can they be put right please because we need to start this clean up with some of the highly polluting vans that are accompanied by a cloud of emissions whenever they touch the go pedal. As a halfway house I support the subsidy on renewable diesel, which is otherwise unreasonably expensive
  - Disappointed there is nothing about schools traffic. The lack of stationary polluting traffic is so clear during holidays that this area needs radical (and of course unpopular) policies eg park & ride enforced by making roads 'pedestrian only' or 'one way' (I believe we have employed a traffic expert recently), around the main school area and staggering school opening times.
3. On/Off Island Emissions
  - Whilst it is good that most of our electricity comes from low carbon French sources, if we are thinking globally, wouldn't it be better if we left that good green stuff for another country on the European grid that would otherwise burn fossil fuels to make its power? Essentially, instead of piggybacking off a politically unstable neighbour, we should grow a bit more of our own and add to the world's stock. Successive COP get togethers have stressed the importance of increasing renewable energy production/distribution but I fear we have hidden in the 'too small to make a difference' hole here.
  - So what could we be doing in order of difficulty?
    1. Telling JE to cease their 'stand-by charge' tax on commercial solar power not owned by them, by which means they have successfully stifled development of this market
    2. Amending Building bye laws to mandate consideration of whether solar power is suitable for every new or substantially refurbished commercial building. How could we put up a new Finance Centre without a single solar panel, heat pump or bit of rainwater harvesting? Its hardly Masdar City, Abu Dhabi.



3. Offshore wind turbines within easy view from the coast need to be able to get Planning Permission. This will cause outrage among NIMBYS with expensive views, but this is an emergency.
4. Prepare the ground for Jersey as a tidal power sandbox. Every political, legal, grid related and cooperative door should be opened, but not the door to the vault. There are enough private 'sustainable' Funds (many administered here) that have substantial monies desperate for suitable R&D investments, to ensure Jersey doesn't use any of its own cash (Government cannot be trusted with anymore capital projects). The strategy would be to create a suitable commercial environment on top of the self-evident geographic one, without subsidies. This is effectively how the finance industry was born in the 1960's
5. At the 'vision' level – I would see a bridge across St. Aubin's Bay with turbines in the bottom and a monorail on top. It produces enough power to enable the production of green hydrogen at La Collette. Hydrogen could then be the basis of all Jersey transport and heating

I feel better for getting that off my chest and hope there may be the odd point therein that contributes to the debate.

Kind regards

A solid black rectangular box used to redact the signature of the sender.

## Appendix 13.4: Individual written submission 904

### Climate Emergency

---

**From:** [REDACTED]  
**Sent:** 22 December 2021 16:45  
**To:** Climate Emergency  
**Subject:** Re: Electric car points.

Dear [REDACTED]

Thank you for your prompt reply. I hadn't intend it to be part of the consultation, but am more than happy for it to be included.

However, if you speak to the minister, could you mention this separately, as it's these small things that make a difference. As things stand people who want electric cars at [REDACTED], can't get a charge point, because it would require a meeting where [REDACTED] would have to agree and this will never happen, as people who are not bothered about this at the moment, just won't bother to vote. I'm sure this is the same elsewhere.

Kind regards

[REDACTED]

[REDACTED]

On 22 Dec 2021, at 3:30 PM, Climate Emergency <climateemergency@gov.je> wrote:

Dear [REDACTED]

Thank you for your email. It has been forwarded to the [climateemergency@gov.je](mailto:climateemergency@gov.je) inbox so that it can be included in the consultation. If this email contains your comments in relation to the draft Carbon Neutral Roadmap, these will be registered. Please read the [draft Carbon Neutral Roadmap consultation privacy notice](#) to understand information we collect and how we will use it.

The consultation on the draft Carbon Neutral Roadmap is live until 31 January 2022 and can be found online at [gov.je/CarbonRoadmap](https://gov.je/CarbonRoadmap). Here you will also find a downloadable PDF of the Roadmap.

A series of all the events we have planned throughout the month of January will be added to the website in due course.

This mailbox is monitored Monday - Friday from 9am - 5pm (excluding bank holidays).

Kind regards,

The Sustainability and Foresight Team

Government of Jersey  
Natural Environment | Infrastructure, Housing & Environment  
19-21 Broad Street | St Helier | Jersey | JE2 3RR  
<image003.png>

---

**From:** [REDACTED]  
**Sent:**  
**To:** [REDACTED]  
**Subject:** Electric car points.

Dear Deputy.

Can I start by saying "thank you" for all the work that you are doing for the environment. I know that many on the island seem to think that environmental issues are problems that other countries have, so I'm thankful that you make a stand.

If I may run something past you.

I live in [REDACTED] where there are [REDACTED] car parking spaces. Non have electric charge points (I feel basic plugs are OK for Jersey) and I have been requesting at owner meetings that we get quotes for having electricity routed to each space, to allow for car charging.

The Articles of Association as complying with the law, states that any changes to the parking spaces have to be agreed by 2/3rd majority, in this case [REDACTED]. As, you can imagine, with a [REDACTED] in the development, there is little or no incentive to vote in favour, at least not by 2/3rds of the owners, so in short, no one can have an electricity supply.

I was wondering whether it would be possible to have legislation that could allow a bypass of this 2/3rds rule specifically for the fitting of electric power points, as I feel this is holding a great many people up from going electric, myself included.

In fairness, most new developments are looking at this, but [REDACTED] as two examples are handcuffed by the 2/3rd rule. (I stand to be corrected)

Once again.

Thank you for your work.

[REDACTED]

\*\*\*\*\*  
\*\*\*\*\*

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\*\*\*\*\*  
\*\*\*\*\*

## Appendix 13.5: Individual written submission 905

### Climate Emergency

---

**From:** [REDACTED]  
**Sent:** 22 December 2021 13:40  
**To:** Climate Emergency  
**Subject:** FW: Future Jersey Transport Policy

**Categories:** [REDACTED]

FYI

Dear Ministers,

Firstly I apologise for copying you all in to this e-mail, but I thought that it would be relevant to you all with your current responsibilities.

I am concerned about the current proposals for our future transport policies within the island. I have been meaning to write this e-mail for some time, but the recent 'Carbon Neutral plan' has driven me to finally sit down and send this. I personally have little to gain by writing this e-mail [REDACTED], but I do not want to see a policy implemented that is fundamentally flawed and wish that I had said something earlier.

My main concern comes from the proposal to re-introduce an annual 'road tax'. My personal feelings are that any tax incentives need to be focused on 'user pays'. My proposal for this is simple; each registered keeper of a vehicle should be making an annual mileage declaration and their tax calculated accordingly. This rate would be calculated by the CO2 emissions and miles covered. A lesser rate would also be set for electric vehicles. What we need to be aspiring to is less vehicles on the roads (electric or otherwise). My fundamental belief is that when someone has invested a significant amount of money in a vehicle (electric or otherwise) and then outlaid for a road tax there is no incentive not to use it. Having made these investments it is cheaper for someone to use their vehicle than to use public transport; I feel that where possible this should be reversed. It would be great if the taxes from any 'greener' transport initiatives could be transparently seen to be going directly back into sustainable transport - i.e. to reduce bus fees, develop new 'personal transport' routes etc.

I see in the Jersey '2019 Framework for Sustainable Transport' it states "pilot the safe use of personal light electric vehicles" will be supported. This I believe needs to be promoted. We are in a great position to push people towards personal electric devices; sized proportionately to the task in hand - e-bikes, e-scooters etc. Therefore reducing the amount of vehicles on the roads. For instance if e-scooters were legalised and then allowed onto the buses people could use a scooter to get to a bus stop and then equally use their scooter at the other end of the bus journey.

It is my opinion that, where possible, we should be looking to sacrifice some of our existing road space to promote 'personal transport'.

Whilst I am contacting you I also feel it appropriate to mention that I feel strongly that people should be able to board a number of buses (even if that's just 2) within an hour to enable them to complete their journey. Incurring a second bus fee for a transfer in town makes the journey impracticably expensive. Incidentally I commend your recent initiative for a £20 fixed charge for young islanders.

In summary it is my belief that we need to be focusing more on getting vehicles off the roads rather than focusing on switching people from fossil fuels to electric.

I hope that you have managed to find the time to read this far and thank you for considering my thoughts.

Kind regards

## Appendix 13.6: Individual written submission 906

**From:** [REDACTED]  
**Sent:** 24 January 2022 16:04  
**To:** Climate Emergency  
**Subject:** Climate Emergency Roadmap

**Categories:** Consultation response

Dear GoJ,

I have completed the survey on the draft Climate Emergency Roadmap, but it is not clear how the results are to be collated and analysed, and I would therefore also like to offer the following comments for your consideration -

**(1) Timescale:** I strongly disagree with the Council of Minister's decision to water down the decision of the States Assembly in May 2019 that 'Jersey should aim to be carbon neutral by 2030'. The revised new target of 2050 is too far away, given the urgency and extent of the climate crisis, and as an Island we should aim for 2030 in line with the decision of the States in 2019. This means that the actions and timescales in the draft Roadmap will need to be reviewed prior to it being brought to the States Assembly, i.e. with the aim of bringing the deadline back to the agreed date of 2030.

**(2) Offsetting:** It will not be possible to reduce carbon emissions to zero by 2030, but carbon offsets offer a viable way forward for governments seeking to achieve carbon neutrality, i.e. when combined with carbon reduction measures. It is entirely right that we should 'require high standards in the use of carbon offsetting', as stated on page 33 of the Roadmap, but in my view the Council of Ministers is taking an unduly negative view of the current state of the carbon offset market. This market is now well-established on an international level, and we need to invest in off-Island offsets at an early stage as well as on-Island. As acknowledged on page 37 of the draft Roadmap, there is much work that still needs to be done in investigating on-Island offsetting, and the quantities of carbon reductions involved may not be all that significant when compared against off-Island offset schemes that are already available. Whilst on-Island schemes are definitely worth exploring, and may well yield significant benefits in the longer term, what matters most is what happens in the Earth's atmosphere as a whole, and Jersey is in a good position to play its part in this connection as an exemplar on the international stage.

**(3) Minister for Energy and Climate Change:** I support this proposal, as it should help to provide the necessary political leadership and focus for the programme. The proposed GoJ Decarbonisation Unit is also a positive proposal, i.e. in terms of providing the necessary departmental support.

I hope that you will find these comments helpful, and I wish you well in your endeavours.

Kind regards,

## Appendix 13.7: Individual written submission 907

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**From:**  
**Sent:** 27 January 2022 08:42  
**To:** Climate Emergency  
**Subject:** Climate change NOT emergency

**Categories:** Consultation response

I don't think you should call it an emergency as this creates fear and hysteria amongst people, especially the young. Some young people believe everything they're told and don't look into anything themselves.

Of course there are climate change issues that need to be tackled but not in this draconian way.

You don't seem to be considering the normal working class people who live in Jersey. Everything you are doing is very easy for those rich people who live here to comply with. An electric vehicle is way beyond the reach of most ordinary families and there aren't many second hand vehicles available.

Also have you considered the damage that the mining for the necessary components for the millions of batteries that will be needed for all these cars?



## Appendix 13.8: Individual written submission 908

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**From:** [REDACTED]  
**Sent:**  
**To:** Climate Emergency  
**Subject:** On and off island  
  
**Categories:** Consultation response

Being a regular walker, it is disheartening to see so many empty greenhouses around the countryside yet supermarket's are full of imported foods we could easily grow throughout the year. If the states have offered help with heating costs why are they not in use. Farmers should be aware of cost and fuel involved by importing these foods. Supermarkets should purchase direct from growers and not import via England (crazy).

On transport the import of massive 4/4s should carry huge import taxes even when electric .they're not suitable for island roads and don't fit in parking spaces!

I personally live in a grade 2 listed house and want to improve the retention of heat but not allowed to change windows only repair them. Relax regulations to like for like would help many home owners.

[REDACTED]

## Appendix 13.9: Individual written submission 909

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** 29 January 2022 14:22  
**To:** Climate Emergency  
**Subject:** Marine fuel

**Categories:** Consultation response

Can it be explained why cars appear to be targeted before boats, car fuel carries a significant duty, yet boat fuel is exempt. As boats are more a luxury item and not essential for most peoples day to day working lives, unlike a car, why is boat fuel exempt?

This scenario is also encouraging French boat users to use fuel as they bypass their governments high duties on boat fuel and obtain it in Jersey.

Of course any rise in fuel duty will be opposed by boat users, but they do have some options in that they can use sail power, which might go some way to explain why France has a higher percentage of sailing boats.

Yours sincerely [REDACTED]

## Appendix 13.10: Individual written submission 910

Please see my general comments on the draft Carbon Neutral Roadmap.

1. The Policy suggestions are (generally) logical but I don't understand how States members can approve them when underlying assumptions need verifying eg;
  - A. Page 101 Assumption; "That there is sufficient electricity capacity to meet the increased demand from these fuel switches". Sufficient capacity and infrastructure needs to be verified before we proceed with 'banning' fossil fuel boilers?
  - B. Page 105 Assumption; "That energy efficiency is preferable to buyers and renters and therefore the market will force landlords and sellers to make improvements." Yes, it's preferable but this is far too simplistic. In a residential market that has so little supply with so much demand, sadly having any property to rent or buy is preferable. So will EPCs mean there are less properties on the market and / or they become more expensive? This issue is exacerbated with a current shortage of energy assessors on the Island.
2. "Funding a Just Transition". Sadly the long term goal of carbon reduction will impact those in society with the lowest incomes. Government "grants" to assist our move to net-zero are from tax revenue and therefore there will be less money for other Government spending. Also, businesses can't absorb all these extra costs, so items will become more expensive. With the high cost of living in Jersey and very high housing costs, Jersey must work hard to reduce the financial impact on those with lower incomes.
3. Boats (registered in France) refuel in Jersey because our fuel is cheaper. It's unfair that this carbon source is part of a target that Jersey citizens are going to have to meet as it has nothing to do with us. There must be a fuel duty on these boats.
4. Private Aircraft; Jersey has many high net worth residents using private aircrafts; if they refuel in Jersey, the fuel is then part of our carbon output and therefore our collective target. How is a "Just Transition" balancing hundreds of tonnes (my estimate) of this fuel (where cost / additional taxation isn't an issue) against those in society who are already struggling financially?
5. Policy TR5: There must be an exception for classic or vintage fossil fuel vehicles to be allowed into Jersey from 2030. Most of these vehicles will be used infrequently, with insurance on limited mileage policies. A concession to allow limited use must be considered.
6. OE1: Fully supportive of this policy as while we are measuring and reducing our scope 1 emissions, it's vital that we remember that "general consumption" of items causes global emissions. To that effect we should make people more aware of the "carbon value" of individual products.

Word count: 429

## Appendix 13.11: Individual written submission 911

### Carbon Neutral Roadmap response

#### General comments;

The Carbon Neutral Roadmap is a welcome piece of policy for Jersey. All other government policy and proposals should be measured against their contribution to implementing the carbon neutral strategy.

The Roadmap must be more ambitious. there is no reason that Jersey cannot 'lead the way' in efforts to decarbonise. We should bring forward deadlines to meet energy reduction and targets for carbon neutrality, with carbon zero (or as near to it as possible) being an early ambition.

The finance industry must be obliged to play a significant part in Jersey's contribution to global efforts to tackle climate change.

The roadmap needs clearer and better defined targets so that progress can be monitored.

#### SP2

Jersey (and Guernsey) should negotiate with France for us to add some windmills to the wind array proposed for construction in the Bay of St Malo. They are building the infrastructure and we should try to obtain an opportunity to construct our own windmills and feed into their distribution network.

The Channel islands could seek energy sovereignty together if we worked closer and shared costs with our neighbours.

Reduction of energy demand must be a key element of energy policy. This should be better reflected in the Bridging island plan and any plan which comes after it.

Is it possible to have a live feed of energy demand in Jersey (this must already be available as the demand through the interconnector). This could be publically accessible to be viewed online and we would all have a live opportunity to reduce demand on a daily and hourly basis.

We must be wary of 'alternative' non-fossil fuel hydrocarbon sources. There is a real and large threat of exacerbating the problem of rainforest and biodiversity loss if we demand more land for growing crops to produce fuels of all descriptions. Energy demand reduction is key, over simple replacement with other energy sources.

Jersey could provide low tax incentives for companies to invest in tidal energy research in Jersey waters.

Small scale energy generation by homes, businesses and at Parish level must be a key part of energy delivery and security. Tax incentives could speed up the rate of implementation of micro-generation.

#### SP3

It is important to recognise that what we do now, will help us now, as much as it will help those 'future generations'. Issues such as energy security is just as important today.

Enhancement of biodiversity - a key consideration in tackling climate change impacts - will benefit us today. Better protecting our terrestrial and marine environment has immediate economic and wellbeing impacts.

A marine Park and better funding for improving the condition of, and extending terrestrial protected areas will enhance resilience, protect human health, make our environment more robust and provide a wealth of societal benefits.

We all must, but Jersey's wealthy residents in particular must pay more tax to fund the transition to a low carbon future.

It is good that the strategy recognises the need for a fair and equitable transition to avoid exacerbating income inequality.

#### SP4

Policy development must be agile to incorporate changing technology and nature based solutions.

All new Government policy and proposals should be measured against their ability to tackle climate change in a fair and equitable way.

#### SP5

We must seek carbon neutrality by 2030 as a goal.

It is good that scope 3 emissions are being considered and this should be a large part of education programmes.

The Financial Services Industry have a critical part to play and must be encouraged and legislated to develop a fossil fuel free, high ESG, 'green' economic model.

Jersey could lead the way in sustainable finance and this must be a key ambition of the strategy, as it is through this that Jersey can have the largest and widest international impact.

High standards in offsetting are critical and should also deliver the UN Sustainable Development Goals.

Individual action is important, but we must not forget that most emissions are created by business and the extremely wealthy. They must be required to play their part to a greater degree than those less wealthy and less able to reduce their 'carbon footprint'.

We must focus on decarbonising as fast and as deep as possible and offset as little as we necessarily can.

### 7. Transport

We must reduce traffic and avoid simply replacing fossil fuel vehicles with electric.

Electric vehicles come with a myriad of their own problems.

There are huge supply chain issues in the materials required and Jersey, through its financial services industry could play a huge part in creating more transparent supply chains.

The problem of battery recycling must be solved, before we demand electrification of personal transport.

End of life scrappage is more important than replacement of fossil fuel vehicles with electric to reduce demand for materials and to reduce wastage..

We must invest in a bus service that has better coverage.

Other small island jurisdictions already have 'on-demand' bus services. The private sector, including companies such as Evie bikes and vehicles, must be supported to deliver alternative travel options.

If we want people to use low energy transport such as cycles, we must make the roads safer for cyclists and pedestrians and reduce the dominance of cars on our roads.

Remembering that social interaction is a key element to support human wellbeing, we must avoid creating a culture where everything is done on-line. Loneliness is a terrible problem and people benefit from eg. shopping locally to get that human interaction.

Building sustainable communities must be a key element of the next island plan.

## 7. Other emissions

### Aviation & marine transport

We must immediately remove subsidies for leisure boats and private aircraft by removing access to tax free fuels.

Any tax on air miles, must include private aircraft.

### Blue carbon

Stopping damage to what we already have is more important than trying to create more. Our sea grass beds and kelp forests should be protected immediately from harm by boat moorings and dredging.

Sea level rise will have a devastating impact on intertidal habitats. We must build resilience into Jersey's shoreline.

We must acknowledge the importance of soil carbon and require agricultural subsidies to be targeted towards increasing soil carbon and away from intensive agriculture, including potato production.

Tree planting is important, but they must be the right trees in the right place. A tree planting strategy which includes hedgerow planting should be developed, to identify what we should be planting, how it should be planted and where is appropriate for planting.

Regenerative agriculture must be encouraged and any subsidies directed towards landowners and farmers who implement enhancement practices.

## Construction

We must avoid and discourage the practice of using poured concrete construction techniques which are wasteful and have a very high carbon footprint.

### 8 Costs and benefits

8.4. - We must acknowledge that climate change is an existential threat to human civilisation. Spending money to survive is not an economic issue, it is fundamental to human health and wellbeing, to the future of young people and future generations. A deep and broad commitment to climate change mitigation can develop a 'green economy' and transition Jersey's society towards a fairer and more equitable society, benefitting everyone.

For example, the reduction in productivity in Jersey may be linked to people's wellbeing, with high stress working environments and little support for mental health. - By investing in mental health services, people's wellbeing and resilience is enhanced, resulting in more productivity which supports the economy and reduces demand for immigration, reducing the need to develop more infrastructure, etc.

We live in a complex and interconnected world and climate change solutions must be linked to better outcomes for people and for biodiversity.

## Appendix 13.12: Individual written submission 912

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** 31 January 2022 16:21  
**To:** Climate Emergency  
**Subject:** Carbon Neutral Jersey

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Consultation response

Hello,

I wholly support any advancement we collectively make to reduce this Island's carbon footprint.

Please though, can we make some serious attempts to capitalise on our significant tidal range to generate our own energy? The Orkney Islands have recently successfully started on this road.

Kind regards,



## Appendix 13.13: Individual written submission 913

[REDACTED]

**From:** [REDACTED]  
**Sent:** 01 February 2022 09:08  
**To:** Climate Emergency  
**Cc:** [REDACTED]  
**Subject:** Fwd: objection to the inadequate misleading and false zero carbon strategy

Resent typo etc

Objection to the inadequate misleading and false zero carbon strategy  
To: <[climateemergency@gov.ie](mailto:climateemergency@gov.ie)>

[REDACTED]

I object to the inadequate misleading and false carbon strategy

I object to Jersey being used as a Paris agreement avoidance by the UK government by not signing jersey up to the Paris agreement

so that the finance industry may continue to profit from harm by not complying with the Paris agreement which requires the finances industry to declare the climate risk associated with investment portfolios

I object to sPPP carrying out the inadequate misleading and false children's rights Impact Assessment of sPPP own document

I object to excluding the Stage 3 production of concrete from the carbon reduction knowing that if concrete production in the world was a country it would be the third largest emitter of CO2 after China and America

jersey excavates in the region of half a million tonnes of aggregates and sand per year primarily for producing concrete this is equivalent to producing more CO2 than the cars on the jersey's roads

At the island plan inquiry it was stated by the construction industry that concrete construction will not be able to achieve passivhaus standards but they were informed by sPPP that this did not matter on the grounds that they are not required to provide a certificate

however timber construction may be delivered to jersey with its certificate

If United States of America is going to require by 2030 that all new buildings are zero carbon i.e. the building will produce energy by the end of the year all the energy it needs from the site

Why doesn't this zero carbon strategy require all new buildings to be zero carbon by at least 2030

The USA can achieve this who produces more CO2 per person than anywhere else in the world surely Jersey can do better

timber construction can provide housing up to 4 stories that which are powered from the sun

Using timber construction to reduce CO2 emissions instead of concrete will not cost the public any money but will save money in building to passivhaus standards as well as lower running costs

From developing the timber construction industry cross the island we will no longer need to excavate sand or aggregates from a national parks which are detrimental to our ecology especially while our ecology is in a ecological emergency

Timber construction is the most intelligent carbon capture Solutions we have

timber construction from sustainable sources not only captures carbon but that carbon is then protected inside the buildings

if Jersey is to purchase carbon capture it could invest in stainable Forest in the world with a long-term view of using that timber for future construction in the Island

if Jersey was considered a local authority island of the UK say the Isle of Wight climate emergency zero carbon by 2030

it would have in accordance with the law climate act produced the island plan informed by an agreed zero carbon strategy by 2030

the island plan can provide low-cost zero carbon Solutions which actually save money as well as provide better preparation for coping with climate change

Such as not building in in flood risk areas such as as in grouville flood zone

and reducing locating housing which increases traffic

Etc

None of the above would cost the public anything

Fiji produces less than a third of CO2 emissions per person than Jersey does but fijji doesn't have a nuclear power station supplying electricity

Fiji who is on the Frontline of climate change were the first to sign the Paris agreement in 2016

If Jersey was considered a small island of the Commonwealth like Fiji

We would have a climate act by now which addresses all aspects of reducing CO2

this includes every government decision making and investments as well as the investments made by companies operating in Fiji and worldwide

How much of our government money is directly or indirectly invested in the fossil fuel industry and Concrete industry which produce CO2 emissions

jerseys unsound carbon strategy is an inadequate false and misleading when you compare it to the Isle of Wight and the Fiji climate act

knowing that the UK government has not yet signed up Jersey to the Paris agreement

knowing that Jersey has failed in delivering the Kyoto agreement reduction of greenhouse gases CO2

delaying zero carbon to 2050 instead of 2030 which will produce a quantity of CO2 in the atmosphere will not be removed

Is exposing future generations to a claim from developing countries in the Frontline of climate change

Fellow Commonwealth island of Fiji is losing whole Islands and their culture

In 2017 at the time of the brexit, the energy partnership, responsible for delivering the Kyoto agreement , advised the worst government that they need to have a resilient supply of renewable energies as an alternative to solely relying on electricity from France

the government has not provided alternative renewable energies produced on the island and within its territorial waters

Jersey is solely dependent on electricity supplied from France

Why did the government not work with the French and expand their wind farm presently being constructed to the south of of jersey's territorial waters knowing that this location is one of the most profitable 4 locations for installing wind farms along the whole of the French coast

in 2027 Jersey has to re negotiate its supply of low-carbon electricity from France

this will be at a time when Europe will be short of renewable energy and they may decide they prefer to keep their factories operating than sell their renewable electricity to Jersey

they may prefer instead to sell electricity from their nearby coal fired power station

if this is the case the CO2 emissions from electricity supply Stage 2 will increase CO2 by up to 50 times which will require Jersey to reduce electricity consumption

We will need to ration electricity

it has been stated by the Jersey electricity company that if the supply of electricity from France is interrupted they will instead use their fossil fuel powered power station at la collette

however this will still require electricity to be rationed if the island is to continue to reduce greenhouse gases in accordance to the Kyoto agreement by 2050 even though Jersey has not been signed up to the Paris agreement by the Boris Govt

Why for example hasn't the zero carbon strategy considered geothermal at La Collette power station

if they did they could remove the fuel dump so affordable zero carbon housing could be provided at the 40 ha la collette wasteland above of commercial as a mixed use development on the scale of 2 x St Malo using the waste heat for over 10,000 homes from the geothermal low carbon electricity production

This will end the burning of single use plastics which produce CO2 as well as toxic gases which pollute the air we breathe and our land and protected Marine Ramsar site

Plastics can be reused in a closed loop economy

but why should we be surprised having a Parkers' sPPP inadequate misleading and false zero carbon strategy when it is compared to the Isle of Wight zero carbon by 2030 strategy or the Fiji island climate act when this profiteering from harm one government in accordance with its own statistic is less trusted than the most corrupt countries in the world who continue to profit from the causes of climate change

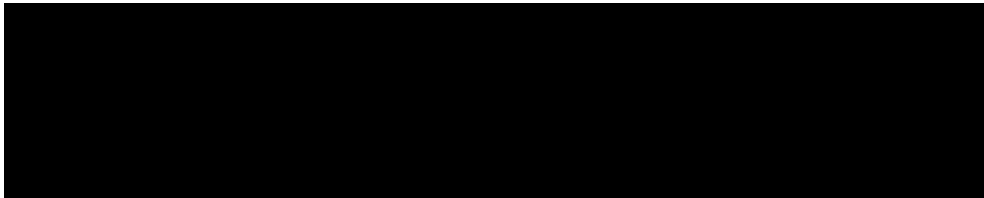
this one government's Parkers' sPPP has produced carbon strategy to enable those who wish to continue to profit from climate change and to continue being part of the problem and not part of the solution expected by islanders

This island inadequate misleading and false zero carbon strategy by 2050 is a violation of human rights to healthy and sustainable environment as it does not provide the islanders with the best strategy the island can afford when compared to other Islands such as Isle of Wight or fiji for example

the zero carbon by 2030 for the Isle of Wight fellow island of the British Isles

or the climate act of Fiji, a fellow commonwealth Island

These may if they choose to, to claim compensation from future Jersey generations due to the present generations inadequate attempt to reduce CO2 which harms them



supporting information to follow

## Appendix 13.14: Individual written submission 914

### Climate Emergency

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**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** John Young  
**Cc:** Climate Emergency  
**Subject:** Carbon Neutral RoadMap

Hello Minister,

I would not normally write direct to the Minister of the Environment, but I believe we are at a crucial moment in history when Jersey has the opportunity to implement deliverable strategies to tackle climate change.

I am sure you will remember when you were [REDACTED] [REDACTED] major changes in the way electricity was sourced in the Channel Islands through the installation of the CIEG.

Both Jersey and Guernsey have enjoyed this low carbon electricity for over 20 years at little cost to the government purse. The carbon neutral roadmap (CNR) proposes a continuation of this strategy; but with investment in new nuclear power which supports our low carbon supply proving to be very costly and subject to considerable delays; it is now time to bring forward government strategies/policies which encourage local investment in renewable energy at a domestic and commercial level.

During my time as [REDACTED] which focused on strategies to deliver low carbon solutions to European island communities, time and time again; the only strategies that worked were those that harnessed the innovation and "human talent" of entrepreneurs and small businesses within the island community. Jersey Electricity's strong electricity grid could easily be used to support such initiatives in our island at little or no cost to government funds, without any risk to security of supplies.

A good place to start would be via electricity tariffs.

1. Legislate the use of "net metering" in Jersey - Canadian model 2. Introduce a single buyer market for electricity - with buy back tariffs controlled by the Jersey regulator - Spanish model 3. Introduce modest competition in electricity sales - French model 4. Facilitate small energy communities, sharing local generation and storage - Greek Model

Such tariffs would support investment in micro energy storage and smart homes using electric car batteries to manage electricity demand peaks.

Another area for consideration is planning and building standards.

1. New roofs should be south facing, angled at 35° and be covered with at least 70% by PV panels 2. New homes should be fitted with simple energy monitoring and control systems on for example water heaters.  
3. New homes and apartments must have a 32Amp electric car charger point 4. Increase insulation values

In introducing any new policies it is important to protect the fuel poor. This could be simply achieved by introducing variable "GST" rates on "net" electricity sales at a domestic level. Those customers with high electricity consumption would pay higher taxes on electricity kWh usage above a certain level. This level would be set above the low level usage of the fuel poor. The additional tax revenue from "high" energy users could be used to support improved insulation in homes and/or renewable energy installations. This option would effectively introduce "block" tariffs and encourage the wise use of electricity, which in turn would support investment in renewable technologies. I am sure you already know that Jersey is one of the rare places which does not impose environmental taxes on electricity sales in addition to VAT/GST.

I hope the above has given you and your colleagues something to consider as you tackle this important subject.

There is no doubt that the future is ELECTRIC. The challenge is to harness and encourage innovation and human talent in the way we generate, store and use and this very valuable resource, for a sustainable future.

Best regards