

Carbon Neutral Roadmap

Consultation Response Statement



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Introduction

Consultation results have been received via the online survey, focus groups and written submissions that took place between 17 December 2021 – 31 March 2022. The information from these different consultation routes has been collated and analysed and the full details and results from all the consultation routes are provided in the separate Consultation Report¹.

This Consultation Response Statement provides responses in relation to the full set of policies as proposed in the draft Carbon Neutral Roadmap. This consultation response does not include responses to recommendations from the distributional impacts assessment.

The consultation has been analysed by officers and the response statements discussed and agreed by the Assistant Minister for the Environment who has been delegated the responsibility for the Carbon Neutral Roadmap by the Minister for the Environment. The final Carbon Neutral Roadmap has been updated to reflect these changes.

A summary of the feedback relating to each of the policies is included. The report is structured into two sections that cover the following;

- A. Strategic Policies
- B. Policy Pack

¹ [Carbon Neutral Roadmap Consultation Report \(gov.je\)](https://www.gov.je)



A. Strategic policy consultation response statements

- The strategic policies have been reviewed using the feedback and responses from the consultation to identify any required changes.
- The feedback from the consultation has been summarized under each of the strategic policies. Full details are contained in the Consultation Report.²
- For the full supporting narrative that supports each policy, refer to the draft CNR as published³.
- A response statement has been provided which describes how the issues raised will be addressed through clarification in the final version of the carbon neutral roadmap.
- The response statements will be used to update the final published version of the CNR

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

Consultation summary

- The majority of written submission responses support strategic policy 1: Jersey's net-zero emissions pathway.
- Of the 2000 survey respondents, 78% (1500) were either supportive or very supportive of adopting the Paris Agreement targets.
 - 11.5% (222) were undecided or unsure
 - 10% (200) were unsupportive

The survey does not provide any additional information on why the unsure respondents selected this option. Whilst we cannot say why they answered in this way, from the written responses 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.

Some of the respondents expressed that they felt unable to support the alignment with the Paris agreement as they felt the targets meant the transition rate was too slow.

Response statement

In response to the consultation summary:

- There is broad agreement and support for alignment with the UK Paris trajectory,

² [Carbon Neutral Roadmap Consultation Report \(gov.je\)](#)

³ [draft Carbon Neutral Roadmap \(gov.je\)](#)



- The importance of ongoing monitoring and evaluation of the impact of policy interventions is recognised and will be a function of the Carbon Neutral Roadmap programme office as detailed in response to strategic policy 4,
- There is recognition that the rate and pace of emissions reduction will be dependent on and may be impacted by external factors including future technology changes as outlined in the energy market workstreams in strategic policy 2,
- The feedback demonstrates clear recognition of the opportunity in terms of international reputation and importance of demonstrating commitment through action,
- The SMART objectives of policy EN5 have been updated to provide clarity on the dates and workstreams to deliver this strategic policy objective.

Response summary	SP1
Outcome	No change
Amendments in the policy wording	No change
Amendments to proposed dates	No change
Amendments to budget and dates	No change
Next steps	Continue as planned

2. Strategic Policy 2: Island energy market

Consultation summary

Survey responses

- Concerns were raised about the energy trilemma with energy security, availability and price being common themes throughout the survey responses.
- 83 respondents commented about wanting to see more done regarding renewable energy at either micro or macro level.

Written submissions

- 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 Phase 3 and other cabling was felt to be a prohibitive cost and a genuine barrier.
- Concern that electricity supply comes from a monopoly provider. This included concerns that without market competition prices may rise causing income inequality.

Response statement

In response to concerns expressed about grid capacity expressed by number of respondents:



- As part of the energy market review, detailed analysis of current and future grid capacity will be carried out in conjunction with the Channel Islands Electricity Grid (CIEG),
- To confirm that energy security and affordability will be core objectives of the scope of the energy market review,
- Provision of transition plans of energy providers is included in the policy and energy review scope requirements,
- Affordability, security and sustainability will continue to be underlying principles in relation to programme and policy development as set out in strategic policy 4.

In response to requests for including more specific information and consideration of the role of renewable energy in the energy market:

- The potential to accelerate the contribution and role of renewable in the energy market will be included as core consideration in the scope of the energy market review,
- A cross channel island renewable energy working group will be established to ensure collaborative working to investigate opportunities with regard to utility scale renewable energy.

In response to the wide range of views expressed on different fuel types:

- Appropriate fuel and technology options will be reviewed and assessed for suitability and viability in the Island market as part of the energy market review work.

In response to concerns expressed about potential market dominance expressed by number of respondents:

- The energy market workstream will include consideration of appropriate regulatory requirements to be applied to a range of future scenarios and will be evaluated and assessed in line with statutory requirements to ensure security of supply and consumer protection.

Response summary	SP2
Outcome	No change
Amendments in the policy wording	Include reference to cross channel island working group on utility scale renewable energy
Amendments to proposed dates	No change
Amendments to budget and dates	No change
Next steps	Working with external stakeholders to scope review work and then commission as planned



3. Strategic Policy 3: Financing strategy

Consultation summary

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.
- an overwhelming theme was that any economic instruments should not result in increased poverty.

Written submissions summary

- There is broad agreement for strategic policy 3. It is evident that there is not one clear solution, that will make solving the financing issue universally accepted. However, it is accepted that there is a requirement for new economic instruments and that tax should be used to incentivise and disincentivise.

Response statement

In response to the wide range of views expressed on costs and financing;

- It is encouraging to see that there is a clear understanding that the draft Carbon Neutral Roadmap outlines how the already allocated Climate Emergency Fund will be used to start to accelerate decarbonization actions
- There is recognition that there is not sufficient funding available under the current financing available to fully implement a net zero pathway
- Policy position papers on future environmental instruments including the range of taxes and charges as proposed in Government Plan 2022-2025 will continue to be developed to inform the decision making of the new government. These instruments will be subject to consultation and impact analysis.

Response summary	SP3
Outcome	No change
Amendments in the policy wording	No change
Amendments to proposed dates	No change
Amendments to budget and dates	No change
Next steps	Develop scope for strategy development



4. Strategic Policy 4: Policy programme and development

Consultation summary

This section refers to the responses in relation to overall programme design, considers the many comments regarding just transition, how impact on income inequality will be considered and how the Carbon Neutral Roadmap impacts will be monitored, reported and evaluated.

From the survey responses it was clear that cost and ensuring a just transition were major concerns. In relation to transport policies, over one thousand respondents identified this as an issue of concern. This was also expressed as a concern in relation to heating policies and how incentives would support the move to low carbon heating systems.

Individual policy response statements are outlined in the supporting policy consultation response document.

Response statement

In response to concerns expressed about whether the roadmap would achieve a just transition to net zero:

- An iterative assessment has been carried out as part of the policy design process including a distributional impact analysis of the most impactful policies included in the Carbon Neutral Roadmap. This process has recommended a number of considerations that will be incorporated into the further design of policies and programmes included in the Carbon Neutral Roadmap,
- The first delivery phase of the Carbon Neutral Roadmap will commence immediately after the States Assembly have considered the report and proposition presented to them in April 2022 and will last for a period of 6 months to ensure alignment with government plan 2023 and annual performance reporting requirements.

In response to the concerns about how the Carbon Neutral Roadmap programme will be delivered on an ongoing basis:

- A Carbon Neutral Roadmap programme office will be established within the Strategic Policy, Planning, Planning and Performance department of Government of Jersey, budget for which is covered under the Regulatory, Enabling and Programme budget allowance,
- The programme office will be responsible for coordination of the further design and deliver the policy suite as set out in Appendix A (amended) of the Carbon Neutral Roadmap,
- The programme office will be responsible for the governance, monitoring, reporting and evaluation of policy interventions in line with statutory and corporate requirements,
- The governance section of the Carbon Neutral Roadmap will be updated once the structure and governance framework has been updated and agreed,



- A review of the Carbon Neutral Roadmap will be carried out by the end of 2025 to evaluate the impact of the policy measures. Revisions will be proposed to be agreed by the new government in 2026,
- The revised Carbon Neutral Roadmap will provide revised reduction targets and policies in line with the financing strategy to be developed by strategic policy 3 and the energy strategy to be developed by strategic policy 2.

In response to the concerns about ensuring a Just Transition:

- In order to ensure compliance with Carbon Neutral Strategy principle 5 and the commitment to ensure a just transition, it is recognised that ongoing monitoring and evaluation of the CNR is required,
- A set of key performance indicators will be developed that are linked to the outcomes of the Jersey performance framework. The KPI's will be monitored and reported on by the programme office. Consideration will be given to implications and opportunities for additional data requirements to enable further distributional analysis to be carried out as part of the implementation of the overall monitoring of sustainable wellbeing objectives as set out in the Public Finances Law,
- The Climate Conversation will continue to play an important role in ensuring a diverse range of stakeholders' views and opinions are heard and incorporated into policy design and delivery, especially those of marginalized groups. Policy EN1 will provide a framework for ongoing involvement and participation in the journey to deliver the Carbon Neutral Roadmap,
- In designing policy interventions and specifically financial incentive programmes the importance of managing adverse impacts is recognised. The policy response statements set out work plans for further development during delivery phase 1. Each policy will be assessed as part of the design process to ensure the design does not cause adverse impacts and is targeted to achieve the most significant overall socio-economic and emissions reduction benefits.

Response summary	SP4
Outcome	No change
Amendments in the policy wording	Include programme office Clarify monitoring reporting and evaluation Clarify review timetable end 2025
Amendments to proposed dates	No change
Amendments to budget and dates	No change
Next steps	Establish programme office in SPPP



5. Strategic Policy 5: Becoming carbon neutral

Consultation summary

- 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
- It was widely felt that there needed to be more information
- 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
- 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.

Response statement

In response to the request for more information and specifically about the implication of alignment with the Paris Agreement targets:

- The SMART objectives of policy EN2 reflect that ongoing awareness and education is required to clarify technical terminology and understanding of the implications of long-term emissions reduction trajectory
- The SMART objectives of policy EN5 have been updated to provide clarity on dates for producing a sequestration strategy
- The targets and objectives of policy EN6 will provide the discussion and consultation on carbon offset timelines to be decided by a future government
- It is recognised that the ongoing monitoring and evaluation of policy impacts outlined in response to strategic policy 4 will provide information to forecast the emissions gap and associated offset costs to enable decision making on the date for carbon neutrality.

Response summary	SP5
Outcome	No change
Amendments in the policy wording	No change
Amendments to proposed dates	No change
Amendments to budget and dates	No change
Next steps	Continue as planned



B. Policy pack consultation response statements

Feedback on the policy details

Feedback from a significant number of stakeholders both in the consultation workshops and in the written responses received was that there was insufficient detail on the individual policies to be able to make a comprehensive response. Stakeholders asked for the consultation to continue and for them to be involved in the development of the policy detail and design of the delivery programme.

There was considerable variation in the feedback from written responses regarding the actual policy details – for example, the size of any potential financial incentive, the eligibility criteria and how it should be implemented.

Recognising the expertise and local market knowledge held by stakeholders the engagement with industry will continue over the coming months, with working sessions set up to establish the policy details and implementation methodology. These sessions will consider all the feedback received on the individual policies as well as the distributional impact assessment results.

On the basis that the individual policies require further work with stakeholders no changes to the details of individual policies have been proposed in this document.

Feedback on the individual policies

- High level feedback on the level of support received by both the survey respondents and those providing written responses are given under each theme below, together with any actions or wording amendments that are being proposed as a result of the feedback.



6. Transport

6.1. TR1 Speeding up the adoption of electric vehicles

Response statement

The overall support for the principle of the electric vehicle (EV) purchase incentive is noted. The consultation feedback highlighted the fact that further development work is needed on this policy to establish the right level of incentive and the eligibility criteria to make the biggest difference in terms of accelerating the uptake of electric vehicles in the Island, given the available budget over the next 4 years and beyond. This needs to include further consideration of commercial vehicles.

It is proposed that work is undertaken to develop the policy details between April – July 2022 in close consultation with key stakeholders within the local motor trade industry. This work will consider, amongst other things:

- Whether the maximum vehicle value eligible for the incentive needs to be increased,
- The percentage and / or the total maximum incentive value per car,
- How the total money available for the incentive over the 4-year period should be spread (i.e., equal amounts over each of the four years or one pot),
- How the incentive can be designed to ensure that one petrol or diesel car is taken off the Island's roads for every EV receiving an incentive,
- How the Government of Jersey can work with the motor trade industry locally to help ensure the supply of EVs, for both passenger vehicles and commercial vehicles,
- How the incentive can be designed in order to ensure that it is accessible to lower income households, for example through consideration as to how it could link to access to low-cost finance,
- Whether the charger incentive should be for smart chargers only,
- How the charging infrastructure policy can support commercial property charging infrastructure.

Consideration of the distributional impact of this policy has focussed on the need to investigate further how the incentive can be used to enhance the supply of second-hand electric vehicles into the Island and to take advantage of the lack of range anxiety due to the small distances travelled by a large proportion of car owners.

Market analysis work will be undertaken between April – July 2022, in conjunction with Commercial Services, to investigate the role and potential to further develop the second-hand EV market.



Response summary	TR1
Outcome	TR1 is retained
Amendments to the policy wording	Clarify that the policy applies to second hand vehicles
Amendments to proposed date, budget & targets	No change Include reference to future possible inclusion of a vehicle scrappage scheme – reference to change to TR2
Next steps	The policy details will be worked up with key stakeholders in delivery Phase 1

6.2. TR2 Vehicle scrappage incentive

Response statement

The concept around this policy was to provide an incentive to encourage the owners of the most polluting, old vehicles to switch to lower carbon forms of transport. The incentive was based on encouraging a move to active travel through the use of vouchers awarded when scrapping the old vehicle that could be redeemed against bus passes, bikes, e-bikes, car clubs etc.

At the time that the policy was developed it was thought that the voucher concept could be utilised within other aspects of the Carbon Neutral Roadmap and the associated overheads of setting up the list of verified and eligible suppliers shared across policies. As these other initiatives were not taken forward the full cost of the overheads would have been attributed to this one policy, making the overhead to incentive ratio very high.

Although feedback from the survey indicative in principle support for a financial incentive to get rid of the most polluting vehicles, detailed responses questioned whether the incentive would actively result in a reduction in the use of cars, or just encourage people to get rid of old cars they weren't using, while continuing to do the same mileage on other vehicles. Questions were raised as to whether the policy delivered good value for money given the high overhead to grant ratio.

The policy will not be taken forward at the current time within the current budget. The policy will be removed from the Carbon Neutral Roadmap policy pack and the budget reallocated.



Response summary	TR2
Outcome	Policy TR2 removed.
Amendments to the policy wording	Remove policy. Include reference within TR1 to consideration of a scrappage incentive in the future.
Amendments to proposed date, budget & targets	2022-2025 budget reallocated to other policies
Next steps	Not applicable

6.3. TR3 Supporting transition fuels

Response statement

The policy generally received strong support as respondents recognised the need to reduce the carbon emissions from existing vehicles as it would take time for the whole island fleet to transition to zero-emission vehicles.

Concerns were raised about the sustainability and global impact of the raw materials used in the fuels and that it did not provide a long-term solution to a decarbonised transport system. Feedback was received around the need for the price of second generation renewable diesel (SGRD) to be the same as standard diesel to shift behaviour. Concerns were raised about the volume of the supply that the Island has access to and the impact of rising prices over time as demand increases. Questions were raised as to whether it was the right thing to spend money on and that the subsidy would distort the rate of transition to EVs if Islanders were provided with an incentive to continue using or even buy new diesel vehicles. Suggestions were made that commercial vehicles and plant equipment that had no electric alternative should be prioritised and questions raised around how biofuel content petrol (E5 or E10) could be supported.

It is proposed that further work is undertaken to develop the policy details between April – July 2022 in close consultation with key stakeholders within the local fuel and energy providers and motor trade industries. This work will consider, amongst other things:

- Ensuring that the sustainability criteria and the sustainability of the palm oil content of the fuels can be verified,
- Further investigation as to the potential long-term implications of the policy on the vehicle and fuel market in the Island and interaction with policy TR1,
- The likely demand for the subsidised fuel at different price points relative to our access to supplies,
- Ways that the subsidy could be targeted to specific sectors, including construction and agriculture,
- Implications for marine and aviation sector in line with comments on policy TR11.



Development work will take place in 2022 to enable the policy changes to be included in the Government Plan to commence in 2023.

Due to the uncertainty and volatility of fuel price and availability, and associated impact on future demand for the subsidised fuel, the total cost of this policy has a high degree of uncertainty. The policy will be reviewed on an annual basis to manage exposure to financial risk and to assess the impact on behaviour change.

Response summary	TR3
Outcome	Policy TR3 is retained
Amendments to the policy wording	Amend policy wording to include annual review of policy impact and manage exposure to risk Amend policy wording to include consideration of other renewable content fuels, marine and aviation fuels
Amendments to proposed date, budget & targets	No change
Next steps	The policy details will be worked up with key stakeholders between April-July 2022 in delivery Phase 1

NEW POLICY: TR 3b Investigate potential for use of renewable content petrol and diesel in Jersey

In response to the consultation responses received, an additional policy has been added to the policy pack. This policy recognises the changes in the EU and UK as they move towards adopting revised standard grades of petrol and diesel e.g., E10 and B7 as part of the EU and UK net zero strategies. As an Island with much lower average mileage and specific infrastructure constraints, additional work needs to be completed to understand the implications for Jersey. The research will produce a policy position on the suitability of renewable content fuels in Jersey by the end of 2022.

The policy position paper will also establish whether the subsidy applied through policy T3 should also be considered for the renewable content of these fuels.

The Government of Jersey will:

Undertake research and market analysis on the products and suitability for Jersey, considering the financial, infrastructure and spatial implications and options. The research will consider the following:

- the potential impact of widespread use of renewable content fossil fuels on the Island's greenhouse gas inventory,
- the market availability and price point,



- supply and distribution networks throughout the Island,
- identify spatial and infrastructure changes required and the implications for import and distribution networks,
- the possible implementation timescale and cost effectiveness considering the alignment with policy TR5,
- consider options and implications for possibility of a differential fuel duty rate for non-fossil hydrocarbons or subsidy through policy TR3,

SMART objectives

1. Carry out research and market analysis to produce a policy position paper by end of 2022
2. The policy details and scope for the research will be worked up with industry stakeholders between April-July 2022 in delivery Phase 1

Assumptions

Consideration of implications for fuel duty will be considered in policy T3 and will be considered by the RPDB environmental taxes subgroup as part of the environmental taxes and charges workstream.

Dependencies

- Island plan
- infrastructure plan
- energy market review – strategic policy 2

CEF 4-Year budget	Total 2022-2025	Deliverables
N/A	N/A	Policy position by end of 2022

Response summary	TR3b
Outcome	Policy TR3b – new policy added
Amendments to the policy wording	New policy to be included in final CNR as outlined above
Amendments to proposed date, budget & targets	Options analysis will identify costs that will be brought forward in delivery phase 1, report by end of Q4 2022
Next steps	The policy details will be worked up with key stakeholders in delivery Phase 1



6.4. TR4 Vehicle emissions duty optimisation

Response statement

The survey responses indicate support for the use of economic instruments as a mechanism for ensuring the principle of polluter pays is applied fairly. The direct result of the policy is that drivers of fossil fuel vehicles pay a higher level of vehicle emissions duty at point of registering the vehicle in Jersey.

No changes are proposed to the policy which builds on the current VED policy within the Government Plan.

Response summary	TR4
Outcome	Policy TR4 is retained
Amendments to the policy wording	No change
Amendments to proposed date, budget & targets	No change
Next steps	Options analysis of VED rates and associated revenue forecasts

6.5. TR5 End the importation and registration of petrol and diesel vehicles that are new to the Island from 2030

Response statement

There was general overall support for this policy, with an acceptance that fossil fuel vehicles would need to be phased out over time. There was some confusion as to whether the policy would mean that existing petrol and diesel cars on the Island would not be allowed from 2030 – to clarify it is only for vehicles that are new to the Island from 2030. There were mixed responses on the actual proposed date, with some feeling that the date was too late and others too soon. However, 64% of survey respondents were either supportive or very supportive of the proposed date of 2030.

There were a significant number of responses both to the survey and in the written responses that raised the issue of classic cars and the need for them to be exempt from the legislation. Due to the small numbers and low mileage travelled by classic cars this is felt to be a reasonable exemption that can be allowed for in the legislation.

There were also questions around whether the legislation would apply to hybrid vehicles and clarification over the dates for other classes of vehicle, with particular emphasis on commercial vehicles and ensuring that the legislation did not come in before suitable alternative zero-emissions vehicles were available / financially accessible. As hybrid vehicles have generally low carbon emissions it could be argued that they have an important role to play in the transition away from fully petrol and diesel



vehicles in the short-term and following the UK's example the legislation could be extended to 2035 for them.

It is proposed that further work is undertaken to develop the policy details in 2022 in close consultation with key stakeholders within the local motor trade industry, classic car enthusiasts, commercial and agricultural vehicle owners and the Disability Strategy Working Group. This work will consider, amongst other things:

- The criteria by which classic vehicles can be made exempt from the legislation,
- How hybrid vehicles should be treated separately under the legislation,
- Which categories of vehicle should the legislation encompass over future dates,
- A full disability impact assessment to ensure that provision is allowed under the legislation to ensure that people with disabilities are not detrimentally impacted by the policy.

Response summary	TR5
Outcome	Policy TR5 retained
Amendments to the policy wording	Amend policy wording to clarify legislation will only apply to vehicles that are new to the Island and that vehicles already in the Island will be allowed to be retained. Exemption will be made for classic cars – details to be confirmed Consideration will be given to extending the date to 2035 for hybrid vehicles Clear reference to completing a disability impact assessment on the policy
Amendments to proposed date, budget & targets	No change
Next steps	The policy details will be worked up with key stakeholders in 2022

6.6. TR6 Review Roads Law

Response statement

There was limited feedback from the consultation on this topic in general, however a number of people indicated that they would support the legalisation of the use of electric micro-mobility.



Response summary	TR6
Outcome	Policy TR6 retained
Amendments to the policy wording	Further detail added into the policy to provide clarification of micro mobility devices
Amendments to proposed date, budget & targets	No change
Next steps	Policy development will continue in 2022 and 2023.

6.7. TR7 Green number plates for electric vehicles

Response statement

There was minimal feedback during the consultation on this specific policy. A few respondents responded negatively to it, suggesting that it was tokenistic and divisive, with others suggesting that black number plates should be brought in to indicate the most carbon polluting vehicles.

There is no cost associated with delivery of this policy to the Carbon Emergency Fund and it is felt that as a combination with the other proposed policies it makes useful contribution to raising awareness and the profile of EVs.

Response summary	TR7
Outcome	Policy TR7 retained
Amendments to the policy wording	No change
Amendments to proposed date, budget & targets	No change
Next steps	Policy and legislative development will continue in 2022 to bring into force in 2023

6.8. TR8 Sustainable Transport Roadmap

Response statement

Encouraging Sustainable Transport was a key topic of feedback during the consultation, and many felt that more should be done in this area, with a greater focus on investing in cycling, walking and the bus network over electric vehicles.

The importance of the role of Sustainable Transport in delivering the Carbon Neutral ambition of the Island is recognised by the Government of Jersey. The comprehensive plan for how it will be delivered will be published in the Sustainable Transport Roadmap in 2022.



Response summary	TR8
Outcome	Policy TR8 retained
Amendments to the policy wording	Change wording to reference 2021 as being in the past. Added a definition of Sustainable Transport.
Amendments to proposed date, budget & targets	No change
Next steps	Sustainable Transport Roadmap published in 2022

6.9. TR9 Bus service development trials

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

There were a large number of comments from survey respondents on buses, with suggestions as to how the bus service could be improved and fuelled by zero-carbon alternatives.

Feedback around the increased frequency of services on some routes, changes to pricing and / or ticketing, the promotion of bus use within the workplace, demand responsive services and low-carbon fuels will be fed into the design of the bus service development trials and will inform the Bus Service Development Plan which will form part of the Sustainable Transport Roadmap to be published in 2022.

Response summary	TR9
Outcome	Policy TR9 retained
Amendments to the policy wording	Further details added to the policy narrative to explain what the trials will involve
Amendments to proposed date, budget & targets	No change
Next steps	Bus service development trials to commence in 2022

6.10. TR10 Active travel

Response statement

Active travel received a large number of consultation responses, indicating the level of importance that the public feel it should be given.



The Active Travel Plan is being developed as required by the Sustainable Transport Policy⁴ (STP) 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. The Active Travel Plan will consider the detailed feedback from the consultation, including:

- Cycling and cycling infrastructure were seen as hugely positive alternatives for the majority of respondents to the consultation survey,
- 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,
- 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,
- Walking was seen to be a potential solution to replace short car journeys. Walking to school was mentioned a number of 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 journey were the cause of a great deal of the congestion problems in Jersey's roads.

Response summary	T10
Outcome	Policy TR10 retained
Amendments to the policy wording	Further details added to the policy narrative
Amendments to proposed date, budget & targets	No change
Next steps	Active Travel Plan to be published in 2022

6.11. TR11 Emissions from aviation and maritime transport

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

Feedback from the consultation raised two key issues in this area. A number of respondents strongly felt that recreational boat owners should have to pay fuel duty on marine diesel and private aircraft users should have to pay proportionately for the pollution they are responsible for.

Recognition was given to the fact that it is extremely important to Islanders to be able to continue to travel to and from Jersey and for goods to continue to be imported. It was noted that a greater

⁴ Sustainable Transport Policy (gov.je)



reliance of local produce had a role to play. The key link across to the policy EN5 Low carbon lifestyles was noted, in particular to the lessons learnt during COVID-19 around business travel.

When considering passenger and freight travel respondents commented that commercial aviation and shipping companies should move to reduce their own emissions until such a time with alternative energy sources become commercially viable. This included more options to travel by sea. Further consideration will be given to marine leisure craft and private aircraft fuel use and duty payable through policy TR3.

Response summary	TR11
Outcome	TR11 retained
Amendments to the policy wording	Change to reflect Ports of Jersey signing of Toulouse Declaration Commitment to consider marine fuel and private aircraft fuel use under policy TR3
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

7. Heating

7.1. HT1 Supporting low carbon heating systems and home insulation

Response statement

The overall support for the principle of an incentive to help people switch to low carbon heating systems is noted.

The consultation feedback highlighted the fact that further development work is needed on this policy to establish the right level of incentive and the eligibility criteria in order to make the biggest difference in terms of reducing carbon emissions.

It is proposed that the Minister undertake this work to develop the policy details between April – July 2022 in close consultation with key stakeholders within the local energy and construction industries as well as landlord and tenant representatives. This work will consider, amongst other things:

- whether the maximum incentive value needs to be increased,
- how the allocation for the incentive over the 4-year period should be spread (i.e., equal amounts over each of the four years or one pot),
- what technologies should be eligible for the incentive, including hydrogen and renewable fuel boilers,



- how the Government of Jersey can work with the local construction industry to ensure that there is sufficient supply of the relevant goods and materials to meet the increased demand,
- how the incentive can be designed to ensure that it is accessible to lower income households, for example through offering full funding up to £10k and consideration as to how it could link to access to low-cost finance,
- further consideration of commercial properties and landlord owned properties.

Energy market review

A large number of respondents raised concerns about the large-scale switch to electrically heated properties. These concerns focussed on the cost of upgrading supplies to 3 phase electricity and whether or not the householder would have to pay that. The cost of the running costs of electric heating was a common concern and linked with the fact that there was only one electricity supplier on the Island. Security of supply issues were also raised. These issues will be addressed in the Energy Market Review (SP2).

Energy efficiency

HT1 includes funding for energy efficiency improvements in properties that are switching away from fossil fuel heating systems. There is no proposed funding in the Carbon Neutral Roadmap for the period 2022-2025 for improving the energy efficiency of properties that are not switching away from fossil fuels. 193 comments were made by survey respondents about energy efficiency and insulation, and many wished to see policy HT1 address subsidies for energy efficiency and insulation more directly.

It is recognised in the Carbon Neutral Roadmap that the current funding of £23million is not sufficient to make all the changes required for the Island to reach net-zero by 2050 – it is less than 10% of the required amount. It was therefore necessary to initially prioritise the funding of projects that deliver the greatest carbon savings, which in the building sector is through switching away from fossil fuel heating sources.

The importance of energy efficiency is recognised in the Carbon Neutral Roadmap and policy HT2 and policy HT3 are designed to increase energy efficiency standards in both new and existing buildings. It is hoped that once the additional funding streams are identified the incentive scheme can be expanded to include a broader energy efficiency incentive.



Response summary	HT1
Outcome	Policy HT1 retained
Amendments to the policy wording	Amendments made to clarify the intention around the incentive value and to commit to further consideration of eligibility for multiple properties by individuals and ensuring that the scheme is accessible to those on lower incomes. Note added that the design assumptions are subject to change.
Amendments to proposed date, budget & targets	No change
Next steps	The policy details will be worked up with key stakeholders in delivery Phase 1

7.2. HT2 Update the building bye-laws

Response statement

The majority of feedback on this policy focussed on the key part of this policy that addresses the end to new fossil fuel boilers being permitted to be installed in any property after 1 January 2026. Although there was overall support for the principle that fossil fuel boilers should be phased out there was detailed feedback concerning the date and what technologies would be permitted after that date.

There was concern that moving to legislation preventing oil and gas boilers being installed ahead of other jurisdictions would result in unnecessary costs, as we would not benefit in terms of lower costs that would come from the economies of scale in the production of the new heating technologies that will be needed for the larger markets.

The consultation feedback highlighted the fact that further detailed work is needed in this area and the Building Bye-Law review will be scoped to include this work. This work will be carried out with continued close consultation with energy providers and the construction and building sectors. It will cover:

- what technologies will be included within the gas and oil boiler end date, including hydrogen-ready and HVO boilers,
- how emissions versus energy will be handled,
- the level of minimum energy efficiency / emissions standards that will be required,
- the ability of the market to be able to support the new technologies,
- consideration for energy efficiency improvements of historic buildings .

Energy market review

A large number of respondents raised concerns about the large-scale switch to electrically heated properties. These concerns focussed on the cost of upgrading supplies to 3 phase electricity and



whether or not the householder would have to pay that. The cost of the running costs of electric heating was a common concern and linked with the fact that there was only one electricity supplier on the Island. Security of supply issues were also raised. These issues will be addressed in the Energy Market Review (SP2).

Response summary	HT2
Outcome	Policy HT2 retained
Amendments to the policy wording	Clarification provided that the legislation preventing the installation of fossil fuel boilers after 1.1.2026 is intended to include commercial as well as domestic properties. Reference made that energy efficiency of historic buildings will be part of the review. Clarified that the energy efficiency proposals will align with the Bridging Island Plan.
Amendments to proposed date, budget & targets	No change
Next steps	Building bye-law review to be completed

7.3. HT3 Energy Performance Certificates

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

65% of respondents to the survey said they were either supportive or very supportive of the introduction of energy performance certificates. Written responses were also generally very supportive of the principle of introducing energy performance certificates but had a lot of questions and feedback on the details within the policy, particularly regarding the dates that minimum standards would be introduced and how they would work in practice.

Some felt that energy performance certificates in the UK had not been effective and that therefore Jersey should look to develop its own approach to generating change in this area.

It is proposed that further work is undertaken to develop the policy details in 2022 in close consultation with key stakeholders within the local construction industry and representatives of landlords and tenants. This work will consider, amongst other things:

- establish the minimum standards that will be applied and exemptions from them, including cost thresholds,
- consider the availability of tradesmen to deliver both the energy performance certificates themselves and the work required to bring properties up to the minimum standards,



- understand further the likely impact on the cost of properties and rents and what measures can be taken to mitigate any detrimental impacts, including protection from rent increases as a result of the energy work,
- consider further how links can be made to policy HT1 in order to support the improvement work.

In recognition of the scale of the additional development work that is required to ensure that Energy Performance Certificate legislation that is right for the Island and that delivers energy and carbon savings a detailed review of the current Jersey domestic energy audit and energy performance certificate system is required, and it is likely that further development work on this tool will be needed. An additional £70,000 will be allocated in 2022-2025 for this purpose.

Historic buildings

Historic buildings were a reoccurring theme throughout the consultation, in particular reference was made to replacement windows, with most suggesting that the rules regarding upgrading windows in historic buildings should be relaxed to allow double glazed windows. As part of this work stream and policy HT2, development the Minister will work closely with the historic buildings team and the Jersey Architecture Commission.

Response summary	HT3
Outcome	Policy HT3 retained
Amendments to the policy wording	Additional SMART objective to review the current Jersey domestic Energy Performance Certificate system
Amendments to proposed date, budget & targets	£70,000 additional budget allocated to this policy to cover extended costs of the domestic EPC review and tool development ahead of the legislation.
Next steps	The policy details will be worked up with key stakeholders in 2022



8. Other on and off-Island emissions policies

8.1. OE1 Promoting low-carbon lifestyles

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

Overall, the consultation responses indicated that respondents feel that the overall carbon footprint of our lifestyles are crucial to tackling the global issue of climate change and that we have a responsibility not just to focus on emissions that are included in our scope 1 and 2 inventory figures. This policy was strongly supported. This is also picked up in responses to the other related policies of:

- 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 key theme of the feedback was that more focus should be placed on the importance of local food and produce and a high quality, education and engagement programme to help Islanders to best understand how they can make personal changes to adopt low-carbon lifestyles.

The results of the survey after Islanders had ranked the options according to their importance:

- A. food and diet,
- B. waste (including recycling),
- C. construction and building materials,
- D. international air and sea travel,
- E. agriculture,
- F. investment and sustainable finance,
- G. electronics,
- H. clothing.

The consultation responses particularly highlighted the immediate need to provide more independent information on electric vehicles, charging and batteries, second generation biofuels and whole life-cycle considerations regarding waste. Some respondents commented that there was a need to address food and diet and animal agriculture.



Response summary	OE1
Outcome	Policy OE1 retained
Amendments to the policy wording	No change
Amendments to proposed date, budget & targets	No change
Next steps	Work to commence in mid-2022

8.2. OE2 Construction sector emissions

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

There was no specific survey question that tackled this policy directly, although some respondents noted the embedded carbon of construction materials such as concrete, cement and steel and the quarrying and the significance of scope 3 emissions from this sector.

The links between this policy and the Bridging Island Plan policies as well as policies HT1, HT2 and HT3 were noted, with the need to consider the embedded carbon in the building materials as well as the operational energy efficiency of the building acknowledged.

The high level of engagement with the Jersey Construction Council and the Association of Jersey Architects on the consultation was welcomed and it is proposed that the Minister undertake further work to develop the policy details in 2022 in close consultation with these key stakeholders within the local construction industry and in conjunction with the Island Plan team and the Jersey Architecture Commission.

Response summary	OE2
Outcome	Policy OE2 retained
Amendments to the policy wording	Reference to PassivHaus removed to align with Bridging Island Plan amendments
Amendments to proposed date, budget & targets	No change



8.3. OE3 Agricultural sector emissions

Response statement

The survey respondents focussed on the fact that people would like to be able to eat more locally produced food. They also considered that farming practices for locally produced food could contribute to the solution and that consideration needed to be given to promoting plant-based diets and moving away from meat and dairy.

Recognition was given to what the local agriculture industry has done and is currently doing to not only reduce the environmental impact of its operations but in taking significant steps to positively improve local biodiversity and environmental quality, with particular reference being made to the LEAF scheme.

The links across to other policy areas were noted. Consideration for agricultural vehicles and plant equipment in relation to the transport policies were noted, in particular the likely lack of availability and prohibitive cost of zero-emissions tractors etc in the short-term. The question of the use of biodiesel for agricultural vehicles and the possibility of policy TR3 applying to red diesel was noted and will be picked up as part of that policy development.

The Rural Economy Strategy will be published in Q2 2022 with the aim to implement it through the Government Plan 2023-2026. The Strategy will be a bridging plan which will facilitate policy development in this area over the next three years and allow further public and stakeholder consultation. Note that a new Marine Economy Strategy will be developed at the same time as the Rural Economy Strategy and aquaculture will be covered under this.

Response summary	OE3
Outcome	Policy OE3 retained
Amendments to the policy wording	Change of reference to bridging Rural Economy Strategy and the fact that aquaculture will be covered in a new Marine Economy Strategy
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

8.4. OE4 Emissions from waste and water management

Response statement

The majority of comments relating to waste and emissions from waste from the survey respondents focussed on the need to improve recycling services, in particular the need for 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.



The discrepancy between the date for the water strategy in the blue box and the SMART objectives was noted, with the correct date confirmed to be 2025.

The written responses included feedback that more needed to be done on waste and that a net-zero waste strategy was needed sooner than 2025. There were also calls for a net-zero replacement for the Energy from Waste plant to be in place ahead of 2040 but it should be noted that the given timeframe worked with the date for decommissioning the current plant.

The waste strategy will be based on circular economy principles, and this will be recognised by creating a Circular Economy Strategy by 2025. The policy wording will be amended accordingly.

Response summary	OE4
Outcome	Policy OE4 retained
Amendments to the policy wording	Add dependency as being the population policy. Amended wording to produce a Circular Economy Strategy.
Amendments to proposed date, budget & targets	Circular Economy Strategy confirmed to be in 2025
Next steps	Circular Economy Strategy to be brought to the States Assembly by end of 2025

8.5. OE5 F-gas emissions

Response statement

There was no specific question in the survey relating to policy OE5 - F-gas emissions and there was limited feedback on the policy OE5.

Of those that included reference to it in their written responses, all were supportive of the principle to extend the UK's compliance with the Kigali Amendment to Jersey by 2025.

One item of note was to ensure the link across to policy EN3 on skills, with a key dependency of the policy being the availability of suitably qualified local tradesmen to install the sustainable refrigeration systems and to service them.

Response summary	OE5
Outcome	OE5 retained
Amendments to the policy wording	Added dependency to EN3 regarding skills
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned



8.6. OE6 Delivering a sustainable finance framework

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

Survey response comments recognised the global impact of our finance sector and the opportunity to make a difference to global emissions.

A number of respondents suggested that legislation should be brought in to ensure that businesses accounted for and disclosed the carbon emissions associated with their operations / transactions, with some going as far as saying that businesses should be forced to divest from fossil fuel activities. It was also felt that the finance sector could fund the decarbonisation of the Island or facilitate the use of innovative funding mechanisms to pay for the transition.

There were comments that also suggested that there was scepticism about greenwashing in the finance sector and the need to put measures in place to ensure all such claims are genuine and independently verified. Reference was made to introducing and meeting international standards.

Active engagement from Jersey Finance and its members in the consultation was welcomed, with the level of engagement, ideas and support for the work stream greatly appreciated.

Feedback specifically from the finance sector focussed on recognition of the industry’s role in providing access to low-cost finance to help all sectors of the community to make the changes required to decarbonise. It was noted that this was directly linked to the heating and transport policies and that they should acknowledge the need for further work with the sector in this area.

Acknowledgement was given to the increasing importance of accounting for climate risk within the industry.

8.7 Citizens’ Assembly on Climate Change – Sustainable Finance recommendations

Note that the Minister for the Environment’s response to the recommendations on Sustainable Finance from the Citizens’ Assembly on Climate Change will be published with the Carbon Neutral Roadmap and reflects the changes made as a result of the consultation feedback.

Response summary	OE6
Outcome	Policy OE5 retained
Amendments to the policy wording	Definition of Sustainable Finance added.
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

9. Enabling policies

9.1. EN1 Decarbonising government

Response statement

Although there was no specific question on this in the survey, there were a significant number of responses in the free text questions relating to the need for the Government of Jersey leading by example.

The written responses also provided strong support for this policy, with specific reference to the important role that the Government could play in providing a managed stream of work that could be used to support industry in upskilling and expanding service offerings. For example, by ensuring that all public buildings have Energy Performance Certificates in the next couple of years and market will be provided to encourage businesses to send staff on commercial energy audit training in the knowledge that there will be the work for them once they are qualified.

The need to make stronger links between this policy and policy EN3 were noted as well as to ensure that the workstream is given the remit to closely considers social value in its work in terms of reskilling and developing the supply chain.

Response summary	EN1
Outcome	Policy EN1 retained
Amendments to the policy wording	Added in a statement "Encourage social value initiatives which will upskill in the Island in addressing carbon neutrality within the working environment."
Amendments to proposed date, budget & targets	Minor changes to dates within policy but not to SMART objectives
Next steps	The programme will be developed during delivery phase 1. A Programme Board will be established and led by Chief Operating Office to design and deliver the decarbonisation programme.

9.2. EN2 Create a Carbon Neutral Alliance

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

The written responses from businesses and organisations were overwhelmingly supportive of this initiative, with a large number of respondents expressing a desire to become involved and to find out more about what it would involve.



The high level of positive engagement on this policy from the organisations representing businesses was noted and appreciated. The policy details will be worked up between April-July 2022 in close consultation with key stakeholders, including Jersey Business, Jersey Finance, the Chamber of Commerce, the Construction Council, Visit Jersey, and the Association of Jersey Architects, amongst others.

Concern was raised that the name of the group had political connotations and it was suggested that it was changed to something apolitical, such as the Carbon Neutral Network.

Response summary	EN2
Outcome	EN2 retained
Amendments to the policy wording	Change of policy name to Carbon Neutral Network
Amendments to proposed date, budget & targets	No change
Next steps	The policy details will continue to be worked up with key stakeholders between April-July 2022 and in delivery Phase 1

9.3. EN3 Developing supply chains and on-Island skills for a sustainable economy

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

Comments from survey respondents were received on both supply chains and skills, in particular referencing the lack of trained mechanics to work on electric vehicles, the provision of relevant courses at Highlands and changes to the school curriculum. Other topics requiring additional skilled workers that were noted include green politics, green agricultural practices, organic farming and renewable energy mechanics. 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.

The written responses recognised the crucial importance of this policy in delivering against all the other policies and the carbon emission reductions overall. Key points raised were that training should be provided locally and that the timing of the training must be carefully considered to ensure that it is ahead of the curve to ensure the capacity is developed within the market before the policies are introduced and demand soars. Areas requiring additional skilled workforce included: plumbers, Passivhaus experts, cavity wall installers, energy assessors and renewable technology installers.

With a link across to TR1 feedback was received that there was no need for a specific register of certified electric charger installers and that cross-reference should instead be made to existing certified electrical professional bodies.



Response summary	EN3
Outcome	Policy EN3 retained
Amendments to the policy wording	TBC
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

9.4. EN4 Delivering COP26 education pledge

The feedback from the consultation on this policy can be read in the consultation report.

Response statement

Strong support was received for this policy across the board, with the importance for education and awareness raising emphasised in a large number of responses, with a key consideration that education in this area needs to be broader than just in schools.

The policy detail will be worked up between April-July 2022 in close collaboration with CYPES, in consultation with the Youth Parliament.

Response summary	EN4
Outcome	Policy EN4 retained
Amendments to the policy wording	Wording changes to ensure clear that all educational settings will be included and not just schools
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

9.5. EN5 Blue carbon, biodiversity, and sequestration

Response statement

There was no specific question in the survey relating to this policy but local projects to support biodiversity and sequestration including blue carbon were popular. There were lots of comments relating to trees – planting, maintaining and protecting them.

The written responses were also very supportive of the need to support biodiversity as part of the response to climate change, with requests for the Carbon Neutral Roadmap to allocate more budget to biodiversity projects. There was some support given to prioritising on island sequestration over the purchasing of offsets from other jurisdictions and the link between sequestration and agricultural practices emphasised.

Clarification is required to ensure that there is no confusion around the fact that international climate change policy requires emissions reduction measures and that local sequestration projects could not be counted both towards Jersey's greenhouse gas inventory and sold as carbon credits to other jurisdictions to be used in their greenhouse gas inventories (double counting).

Response summary	EN5
Outcome	EN5 retained
Amendments to the policy wording	SMART objectives to be strengthened Added reference to restoration
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

9.6. EN6 Carbon offsets

Response statement

Consultation responses were received on the overall ambition of the Carbon Neutral Roadmap and the difference between carbon neutrality and net-zero. These are covered in the consultation response on the strategic policies, specifically SP5.

Specific feedback was received on the use of carbon offsets. A number of respondents felt that on-Island emissions reduction projects and local sequestration projects should be prioritised over the purchasing of offsets from elsewhere and that purchasing carbon offsets was just a way to shirk our own responsibilities.

Others felt that carbon offsets have a role to play in the transition, particularly where they offer additional benefits, for example in helping to tackle the biodiversity crisis or supporting international development. There were calls to bring forward the date that the Carbon Offset strategy is published and for the Government to start purchasing offsets at an earlier date.

Response summary	EN6
Outcome	Policy EN6 retained
Amendments to the policy wording	Title and policy wording amended to provide clarity over carbon neutrality remaining the aim for 2030. Changed to 'Carbon Offset Purchase Strategy'
Amendments to proposed date, budget & targets	No change
Next steps	Continue as planned

