



Welsh Assembly Government consultation on a National Energy Efficiency and Savings Plan

Cynnal Cymru-Sustain Wales response

Cynnal Cymru-Sustain Wales is an independent, not-for-profit organisation that promotes sustainable development (SD) and provides practical information to help people in Wales live sustainably. We work with a wide range of people and organisations across a broad range of issues – from climate change to economy and from fair trade to health. Our work focuses on three key areas:

- Promoting Action and Debate
- Changing Behaviour
- Influencing Government

We welcome the opportunity to comment on this document, being of the opinion that it has an extremely important aim – i.e. to reduce energy use and greenhouse gas emissions in Wales, and to ensure that everyone in Wales can access help and support to enable them to do this.

The response provided below is a synthesis of comments and suggestions that we have gathered from:

- our Transformation Nation report research (published in September 2008, comprising of evidence gathered over 3 years from engagement with the public and a wide range of civil society stakeholders, to help the Welsh Assembly Government produce an exemplary Sustainable Development Scheme for 2008 and beyond);
- observations made by Cynnal Cymru-Sustain Wales staff.

Introduction

General comments

- a. We welcome the decision to focus on practical, short term actions that can have an immediate impact – but suggest that there should be greater clarification as to how these actions will sit alongside longer term, more significant actions (laid out in other Strategies).

- b. We welcome the fact that the Plan seeks to contribute to addressing *both* priorities of tackling climate change and promoting social justice (by reducing energy costs and GHG emissions), but question whether both of these are equally and adequately addressed in the document (see below – Qu.11).
- c. We agree with the three key objectives but would suggest that a fourth be added in relation to energy security and the need for all households and sectors to become resilient to future energy challenges such as ‘peak oil’. It should also be acknowledged that such energy challenges may lead to an increase in fuel poverty in the future if action is not taken now to avoid this.
- d. We agree with the key principles and themes for action. Our Transformation Nation research included the proposal that the use of unsustainable energy sources should not be excluded from scrutiny under the Sustainable Development duty, and we therefore particularly welcome the commitment to “not invest in carbon intensive solutions or technologies” – although a definition of what is regarded as ‘carbon intensive’ is necessary.
- e. We welcome the use of the ‘energy hierarchy’, where reducing energy demand is prioritised.
- f. We welcome the recognition that “small scale distributed renewable energy generation has an important role to play in delivering reductions in energy bills and greenhouse gas emissions”.
- g. We welcome the fact that WAG’s business advice programmes will “help businesses to take advantage of the developing markets for low energy products”.
- h. We feel that the policy context of the Plan is not very clear. A diagram, a table, or clearer text is needed to demonstrate how the different proposals and actions will support / feed into / be divided into other Strategies and Action Plans (including the SD Scheme, Climate Change Strategy, Energy Strategy, Fuel Poverty Strategy, Green Jobs Strategy. Similarly, a diagram summarising the support and funding available to Wales from the UK and energy companies would also be useful.
- i. We welcome the commitment to maximise benefits for Wales from UK policies, regulatory and fiscal instruments.

Q1. Do you agree with the proposed approach to measuring success? What measures of success do you think would be the most meaningful?

- We propose that WAG monitor, and regularly report on, energy consumption in Wales - so as to measure whether the Plan is successful in terms of reducing energy demand and increasing energy resiliency.
- We would also suggest that, when reporting on success, it would be useful to plot the indicators against each other, to see how they relate to / influence each other.

Part One: Individuals/householders

General comments

- 1.1 It would be useful if WAG could share the findings of the consumer research into climate change messages and support, with other organisations that are also seeking to communicate such messages..
- 1.2 We welcome the decision to take a 'whole house approach' as a means of determining financial support for households.
- 1.3 It would be useful to measure and monitor how many people actually make changes or undertake energy efficiency measures after having received the advice and support provided. Similarly it would be useful to know how WAG envisages the expansion of its 'Help Wales reduce its carbon footprint' campaign.
- 1.4 We would suggest that greater detail is needed with regard to what targets and milestones WAG are aiming for, in terms of both fuel poverty and energy demand reduction (at national and local levels). These are necessary to drive action, and in order to report on progress.
- 1.5 In determining such targets, consideration needs to be given to the fact that fuel poverty could increase if the issue of energy security is not acknowledged and addressed in time. This is in the context of the expectation that even existing fuel poverty targets are unlikely to be met – yet the extent of this challenge is not given adequate prominence within this Plan.

Q2. Do you agree that the primary aim of HEES should be to improve energy efficiency in the homes of people likely to be in or vulnerable to fuel poverty?

- We agree that the primary aim of HEES should be to improve energy efficiency in the homes of people likely to be in or vulnerable to fuel poverty.

Q11. Do you think the proposed package of support for all householders is appropriate? Is there anything missing?

- The package is presented as being for every householder in Wales yet, apart from the Credit Union loans, the package seems to consist only of targeted support.
- We feel that there is insufficient detail about actions to encourage 'able-to-pay' households to reduce their energy consumption. If these actions are to be included in the Climate Strategy (or elsewhere) instead, then this needs to be made clear. For example, reference is only made to encouraging people to move to cheaper energy tariffs. 'Able-to-pay' households, however, could instead be encouraged to move to a 100% renewable energy tariff.

Q13. Do you agree that we should work with trade associations to encourage their members to build skills and offer advice and services in low carbon refurbishment?

- We strongly agree that WAG should work with trade associations to encourage their members to build skills and offer advice and services in low carbon refurbishment.
- We would also suggest that the development of such skills should also be incorporated into the

training of students who are seeking to work in these trades, and that employers request these skills when recruiting.

- DCELLS and partners need to rapidly up-skill trades people and have a clear timetable / plan of how Further Education colleges and apprenticeships will give people the skills needed to urgently develop a low carbon economy.
- The 'Green Plumbers of Wales' programme is a one example of how the above could be achieved (www.connaught.plc.uk).

Q15. Do you think that better coordination of advice and support (along with the proposals for targeting support on page 31) will ensure that everyone is able to access appropriate advice and support on energy related matters?

- We would suggest that it may be necessary to develop local, dedicated energy efficiency 'surgeries' or energy efficiency officers, if other service providers feel that it is beyond their capacity.

Q16. Are any advice or support services missing from the list above?

- Care service providers.
- Estate and letting agents.
- Financial advisers.

Q17. Is there anything else the Assembly Government and its partners should be doing to ensure that everyone is able to access appropriate advice and support on energy related matters?

- Increasing sources of energy efficiency information – for example, banks, doctor/dentist waiting rooms, post offices, student unions.

Q18. How could your organisation contribute?

- We could inform our Members and Friends about sources of advice and support via our monthly newsletter.
- We could encourage our Network Partners to circulate information to their staff and members.
- We could direct users of our website to advice and support services.
- At events where we display our 'sustainable home', we could inform visitors about the advice and support services available.
- We could put case studies of good practice on our website – such as of community renewables or businesses developing energy efficient products.

Part two: Communities

General comments

- 2.1 We welcome the fact that WAG want to “build capacity within communities to help them take advantage of these opportunities, support communities who are already taking action and encourage more communities to get involved in energy saving and greenhouse gas reduction projects”.
- 2.2 We welcome the “whole house, whole community approach”.
- 2.3 We welcome the ‘Wales Fuel Poverty and Renewable Energy Project, and would be interested to know how much of the low carbon buildings funding will be dedicated to this.
- 2.4 We welcome the Community Scale Renewable Energy Generation projects, and the recognition of the significant role that social enterprises can play within this agenda. We are planning to hold an event for social enterprises at the end of the year, and would be happy to promote this project there.
- 2.5 We welcome the Heads of the Valley Low Carbon Zone project, and its recognition of how this agenda can regenerate local economies and create jobs. In this way, the project appears to be implementing some of the proposals made in the ‘Green New Deal’ (by the New Economics Foundation) – proposals supported by a number of our members. We would suggest that, building on the lessons learnt from this project, it should be rolled out across Wales as soon as possible.
- 2.6 We would be interested to know more about how the Pathfinder projects will be created and funded, and the programme that is being developed to increase the awareness of community groups.
- 2.7 Cynnal Cymru-Sustain Wales would be very keen to help with the recognition of good practice, and the wider sharing and dissemination of good practice, and would be able to feature this on our website (which is to be significantly upgraded later this year).
- 2.8 We are working with WCVA to provide ‘An introduction to sustainable development’ training for third sector organisations – which will include information about energy use.
- 2.9 One of the proposals in our Transformation Nation report was that “ESCOs for Wales should be introduced soon”, and we therefore welcome the plan for the ESCo at The Works, and the intention to explore the potential of ESCOs further.
- 2.10 A further proposal in this report, was that it is necessary to create a consistent planning framework that facilitates, and speeds up, small-scale renewable energy / energy efficiency projects – especially for community energy projects. Concerns about barriers within the planning system prevent people from considering the possibility of generating their own energy, and it would therefore be useful for information to be included within the Plan, explaining how the planning system will be adapted in line with its ambitions.
- 2.11 We also recommended that it is necessary to put in place an energy distribution system to cope with de-centralised power generation and micro-generation, and minimise losses in transmission. It would be useful to know about what advances that are being made in relation to this, to ensure that the ambition to

support microgeneration and community renewable energy projects has the necessary infrastructure in place.

- 2.12 We welcome the decision to provide a development fund to support community groups wishing to take action on climate change, and the commitment to provide training and resources for community groups.
- 2.13 We welcome the commitment to mainstream sustainable development principles and outcomes for all funding streams for community and third sector organisations. We would also be interested to know more about the detail of this, so that we can communicate this during our training sessions with third sector organisations.

Part three: Business, commerce and the sustainable energy sector

General comments

- 3.1 We welcome the recognition that “business fit for the future will need to operate and thrive in a low carbon economy” and that WAG “needs to work with businesses to take advantage of opportunities provided by this move to a low carbon economy”.
- 3.2 We welcome the fact that all businesses supported under Flexible Support for Business (FS4B) will receive advice on future-proofing, but suggest that this includes information on energy security (and ‘peak oil’) as well as energy efficiency. We would suggest that the ‘future-proofing’ approach also be applied to work with households.
- 3.3 In addition to working with letting agents and estate agents with regard to Energy Performance Certificates (EPCs), we would recommend that they be asked to refer clients to energy efficiency advice and support.
- 3.4 We strongly agree that “energy efficiency refurbishment skills should be widespread amongst different trades”, and recommend that research be done into how this has been achieved in Germany.

Q28. What additional training or skills do you think will be needed to ensure Welsh businesses can take advantage of opportunities posed by UK Government and Assembly Government energy efficiency and microgeneration policies? (This question was also posed in the Green Jobs Strategy consultation)

We recommend that an audit is undertaken to find out what skills will be needed to meet the objectives of this Plan and what areas to we therefore need to upskill into. We suggest that such an audit should cover skills relating to research and design, manufacturing, installation, refurbishment and advice provision.

We also suggest that:

- Efforts should be made to ensure links and synergy with the Science Strategy, academic skills development, R&D funding;
- We don't neglect support for existing solutions / products that are already ‘fit for the future’, rather than focusing only on funding new design and technologies, e.g. sheep wool insulation, PV;
- Partner and learn with companies and bodies internationally who are already leading their fields and

identify potential niche markets for Welsh specialism.

- Careers advice and support should highlight the opportunities available in this area.

Part four: Public sector and local government

General comments

- 4.1 We strongly agree that “in order to mobilise the population of Wales to reduce their energy use we will need to ensure figures and organisations in the public eye are seen to be doing the same”.
- 4.2 No mention is made in this section of the Plan here about the role of Welsh educational institutions to help develop skills, and inform pupils about career opportunities, relating to the manufacture, installation and maintenance of energy systems. We need to make this link.
- 4.3 We welcome the creation of a “cross public sector energy efficiency invest-to-save fund”.
- 4.4 Cynnal Cymru-Sustain Wales would be happy to help with the promotion of examples of success and best practice.

The following are optional. If you provide contact details we will only contact you in connection with this consultation, or future consultations

Name	Michele Aitchison
Organisation	Cynnal Cymru – Sustain Wales
Email	michele@cynnalcymru.com
Postal address	Cambrian Buildings, Mount Stuart Square, Cardiff, CF10 5FL
Telephone	02902 19 20 20
Preferred language of communication	English / Welsh