

**By email only :**

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Dear Sir/Madam

**The response of Natural Resources Wales to the Welsh Government's consultation on an Energy efficiency strategy for Wales.**

We are pleased to have had the opportunity to respond to the consultation on the Energy Efficiency Strategy for Wales. We welcome Welsh Governments focus on energy efficiency and the recognition that addressing energy efficiency is a priority in delivering socio-economic benefits and reducing our greenhouse gas emissions. We note the broad scope of the strategy and welcome the comprehensive set of practical areas of action proposed.

Please find our response to the specific consultation questions below.

**Q1) Do you agree with the areas of action set out in chapter 5.1: Overcoming Barriers?**

Yes

In *Area of Action 1.13 - Work with large businesses to use energy more efficiently* we welcome the recognition of the importance of achieving efficiencies in larger businesses and industry. The EU Emissions Trading System, CRC Energy Efficiency Scheme and the Energy Savings Opportunity Scheme can help meet Wales's energy efficiency commitments through the creation of both financial and reputation mechanisms capable of achieving significant energy efficiencies and greenhouse gas emission reductions from industrial activity and energy generation.

Natural Resources Wales is responsible for the regulation of these schemes in Wales which, collectively, capture around 50% of the total Welsh greenhouse gas emissions. For example, the EU Emissions Trading System captures 20,000 tonnes of CO<sub>2</sub> emissions every day from both Aberthaw Power Station and Port Talbot Steelworks.

Our primary role is to ensure participating organisations comply with the three schemes in Wales. We take an active enforcement role to ensure high rates of compliance, and thereby increase the effectiveness of the schemes, through provision of advice, guidance and support to participating organisations.

Ty Cambria

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Correspondence welcomed

We worked with the EU, Welsh Government, DECC, the Environment Agency and other UK regulators to transpose the Energy Efficiency Directive and the EU Emissions Trading System into domestic law, and also contributed to the development the CRC Energy Efficiency Scheme Order 2013. Through ongoing collaboration with these bodies we will continue to take an active role in improving the effectiveness of the schemes and the supporting policy frameworks. Our contributions always aim to ensure the effectiveness and maximum coverage of the schemes in Wales.

#### *Overcoming barriers for the public sector Areas of Action 1.16 to 1.18*

We believe the public sector should take a leading and visible role in the wider drive for energy efficiency improvements across Wales. The NRW environmental management system is certified to ISO14001, which requires us to continually improve our environmental performance including reducing our energy use and carbon emissions. Working with the Carbon Trust we are also in the early stages of working towards becoming a carbon neutral organisation that will involve a programme to further reduce energy use throughout our offices and opportunities for micro-generation and carbon storage across the NRW estate.

In line with Action Area 1.17 we will be keen to showcase successful projects from this process.

We welcome the focus on resource efficiency through the National Procurement Service set out in Area of action 1.18 and hope it will allow us to achieve maximum value for money and to support local businesses as we undertake our project to become carbon neutral.

Raising individual energy awareness and changing personal behaviours is one of the biggest challenges in addressing energy efficiency. The Welsh public sector is a major employer and could also provide a convenient and effective communications route through its employees to promote household and community energy efficiency. There would be value in developing energy awareness and advice programmes targeted at the residential level that can be run within public sector organisations.

## **Q2) Do you agree with the areas of action set out in chapter 5.2: Developing the supply chain?**

Yes



**Q3) Do you agree with the areas of action set out in chapter 5.3: Education and Skills?**

Yes

**Q4) Do you agree with the areas of action set out in chapter 5.4: Innovation?**

Yes

We support the view that the Welsh public sector has great potential for development and adoption of innovative energy solutions as detailed in *Area of action 4.3 Energy efficiency innovation in the public sector*. We will be seeking innovative energy efficiency and micro-generation solutions to assist us in meeting our objective of becoming a carbon neutral organisation.

**Q5) Do you agree with the areas of action set out in chapter 5.5: Finance?**

Yes

Lack of finance for energy efficiency investments has previously been a major constraint to our adoption of energy efficiency technologies. We therefore welcome the Areas of Action 5.9 to 5.11 set out to address the issue of financing energy efficiency developments within the public sector.

**Q6) Do you agree with the impact assessments associated with this draft strategy?**

Yes

**Q7) We have asked a number of specific questions. If you have any related issues that we have not specifically addressed.**

No

If you have any questions relating to this response please contact Gideon Carpenter in the first instance at [Gideon.Carpenter@cyfoethnaturiolcymru.gov.uk](mailto:Gideon.Carpenter@cyfoethnaturiolcymru.gov.uk) or 03000 65 3562.

Yours sincerely

Rhian Jardine

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