

How can we define accountability if no one is accounting?

Decisions are being made on a daily basis that are increasing emissions but no one is regulating these increases against the budgets set. Hope is not a strategy.

Introduction

The UK National Atmospheric Emission Inventory (NAEI) is the single source of emissions reporting that is used to retrospectively match up against the Climate Change Committee's emission budgets which set the future pathways to net zero by 2050.

The UK Government has a significant weakness in its measuring process. No one is counting off the emissions caused by everyday decisions and judging whether they are within the tolerance of what the budgets were set for.

If no one is keeping this short-term tally and decision makers (planning authorities, Secretary of State, the board room) are not netting off new emissions against the budgets set then achieving net zero won't happen.

The disconnect between measuring, reporting and verification

Sectoral approaches to measuring, reporting and verification of emissions are siloed. There is no process in hand that looks at the whole system emissions impact of sectoral silo decision making.

For example, a new major road project will undertake a greenhouse gas assessment using the Department for Transport's guidance. It will quantify all direct emissions from construction, land use change and future surface traffic (Scope 1), emissions associated with electricity use (Scope 2) and will often look at the emissions that the project can influence beyond direct emissions, such as from the manufacture of the materials used in the road's construction (Scope 3).

The project may be exemplar and look at its unintended consequences of new road building such as more emissions produced from the manufacturing of new cars to fill it. It may gather a comprehensive set of data cutting across national emissions segments including manufacturing, land use change, energy generation and transport.

All of this data will be locked up within a PDF and not shared with the respective emission segments to ensure transparency, and more importantly ask whether these additional emissions are within their sectoral tolerances. There is an additional problem for this data, even if it were shared.

We know the calculation methods used to understand the emissions inventory of a project such as a road are not the same at those within the NAEI, which means there is no consistency in data gathering in order to compare to the national tally in the first place.



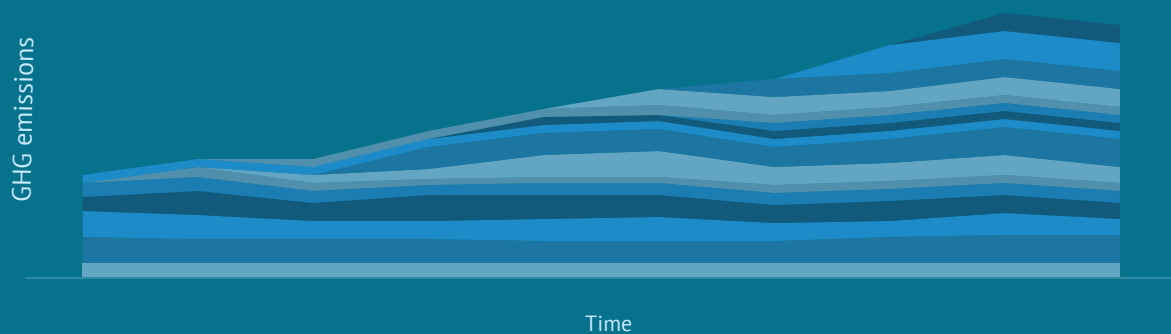
The comparison and decision on emission tolerance within the set budgets is not happening and even if it did the data would not be consistent, comparable, complete or accurate. And with no transparency this data doesn't meet the basics of the Paris Agreement Article 13.

One more project won't hurt, will it?

Government takes the view that each individual project is not significant when compared the national tally and therefore suitable for investment. This results in statements seen in Nationally Significant Infrastructure Projects climate change assessments that millions of tonnes of emissions are not significant and therefore forgotten about, until they've actually occurred.

The emissions quantities being established in these projects are not being directly accounted for within the NAEI and the CCC are not netting or accounting for them from the carbon budgets at an early enough stage.

No one is keeping a tally of the cumulative impact of infrastructure investment across emission segments until they've happened.



Is infrastructure temperance what we need?

The greatest reduction in national emission reduction is not to use resources in the first instance. This is the whole premise of the circular economy. The CCC assumes the route to net zero is to decarbonise the unabated consumption of resources.

This means that the Climate Change Committee has not taken "don't build it" into consideration as a primary decarbonisation route.

To close the gap on decisions that will result in new GHG emissions the Climate Change Committee's mandate should be extended to being a primary consultee on all Nationally Significant Infrastructure Projects. The mandate should include providing a judgement as to whether emissions from projects fit within their budgets or not, and creating the central accounting route to support decision making.

At a more local level, planning authorities should ensure that their local plan has established a GHG budget for growth. This should then be used to ensure the growth plans are accounted for, and projects are netted off the budget as they come forward.

By understanding the impact of projects on the national and local budgets, better decisions can be made as to whether projects are within the tolerances of meeting our obligations to 1.5 Degrees by 2050.