

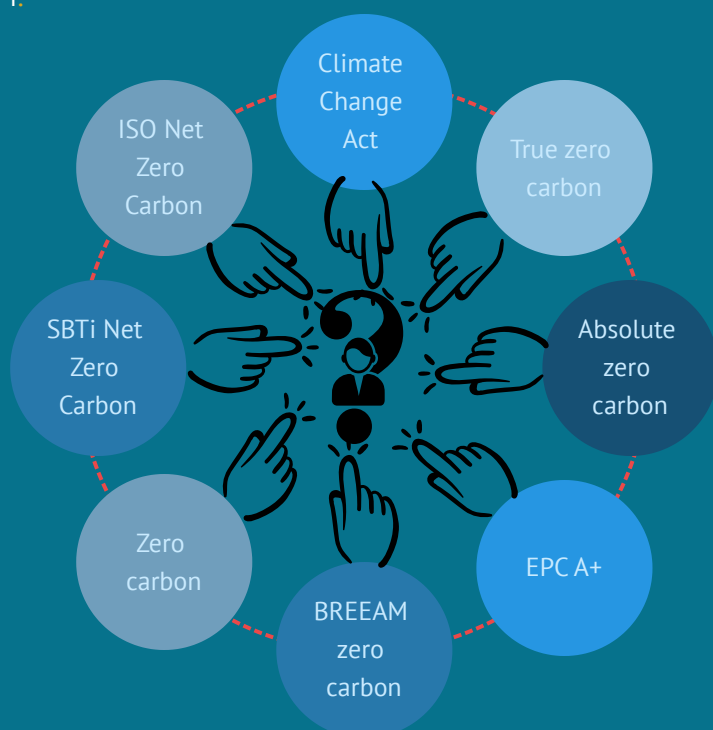
The rise of sector micro guidance and micro management

The lack of structure to emission reporting up to government has created different sectoral languages and approaches to measuring and reporting creating a lack of transparency and consistency in regulation.

At a national level, government policy and guidance on measuring and reporting emissions, differs substantially within each sector, creating a disconnect in how emissions are accounted and reduced. This is creating a major impact on government's ability to deliver consistency and comparability on emissions across UK sectors, leading to a lack of transparency and integrity in their Net Zero Strategy.

This disconnect is further exacerbated by independently created 'micro guidance' within sectors looking to refine the transparency issues with emissions measuring and reporting, trying to define a new 'good' but only adding further complexity.

An example of this micro guidance complexity can be seen in building emissions with the broad range of standards and procedures for defining zero carbon buildings - from Green Building Council Net Zero Standard, the LETI standards, BREEAM zero carbon, to the National Calculation Method Rating A of the Building Regulations in addition to a range of local authority policies defining true zero, absolute zero and zero carbon outcomes. In the transport sector similar micro guidance comes in the form of DMRB LA 114, PAS 2080 and the new Quantitative Carbon Reduction guidance of LTP4.



All of these guidance documents use different words, emission factors and reporting metrics meaning the outcomes are incomparable and essentially meaningless in the whole system of climate change accounting.

No regulatory consistency

How the impact of newly created emissions from development and infrastructure is treated by regulators varies significantly too. What is considered a significant quantum of emissions, and grounds for refusal in planning regulation, is deemed acceptable elsewhere in the same regulatory framework.

For example, there are local authorities that view individual new dwelling emissions of 500kg CO₂/year as being significant enough that they must be zero carbon. At the same time road building schemes, such as the Black Cat Improvements^[1], are creating in excess of 50,000 tonnes of direct emissions per year which Government say are not significant.

This lack of consistency is being caused by experts' misunderstanding of the materiality of emissions by applying guidance meant for one sector into another. Using the example above we see experts refer back to the GHG Protocol which states that a single emission source that is less than 1% of the total emission of a 'product' are not significant and therefore don't need to be reported.

For a new house, the figure of 500kg CO₂/year contributes a large proportion of the emission footprint of a house (the product), therefore it is considered significant enough to warrant regulating and neutralising through local planning policy.

The road improvement scheme is comparing its emissions to the whole UK emissions, defining the whole UK emissions as the product. Obviously this will make any single project a fraction of the total emissions, and therefore defined as not significant.

The major error here is not treating the project itself (like the house) as the product under the GHG Protocol.

A single methodology for defining significance

The complexity of international, national and independent guidance on emissions reporting and decarbonisation is creating more inconsistency within private sector reporting than the guidance(s) are trying to resolve.

Net zero won't be achieved unless consistency and accuracy in reporting and how significance is determined between sectors.

At a national level reporting aligns to the requirements of the IPCC. In the UK the National Atmospheric Emissions Inventory is the single and only source of methodology for accounting emissions for our collective net zero goals.

In understanding the whole system of emissions for any organisation utilising a single guidance methodology, such as ISO IWA 42 Net Zero, and understanding the government's definition of residual emissions is a good starting point. Then, aligning emissions reporting to the National Emission Inventory segments to create consistency and comparability will enable better consistency and comparability across sectors.

Science based targets aligned to the Paris Agreement 1.5 degrees target means something significantly bigger than single narratives. That doesn't mean the end of micro guidance, it just requires those who produce it to understand how it fits in to the whole system of emissions reporting.

[1] <https://nationalhighways.co.uk/our-roads/a428-black-cat-to-caxton-gibbet/>