The Carbon Neutral Roadmap

Review by Mark Boleat of the policy-making process

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Introduction

This paper analyses the policy-making process behind Jersey's policies to achieve its targets for reducing carbon emissions. The paper accepts the scientific evidence on climate change, the need to take action at a global level and Jersey's commitment to play its part. The paper suggests that the policy-making process was flawed as a result of which targets have been set which are not capable of being met. The paper concludes with suggestions on how to improve the policy-making process.

Summary

There is overwhelming scientific evidence that carbon emissions are causing global warming with significant adverse consequences. Action has been agreed at international level to tackle climate change. Jersey has committed to comply with the agreed action.

The States Assembly has agreed a Carbon Neutral Roadmap to meet ambitious targets to reduce emissions. The key targets to be met by 2030 are –

- End registration of new petrol and diesel cars and small vans.
- 67% of vehicles decarbonised.
- 75% of domestic and 50% of commercial fossil fuel boilers decarbonised.

The Roadmap implies that a third of all households will decarbonise their domestic heating by 2030 at an average cost of around £10,000. The target will not be achieved in the absence of a combination of a significant increase in the tax on oil and a generous incentive scheme, which in turn would have to be financed by taxation. The Roadmap has no analysis of what needs to be done in order to achieve the target.

Given the gap between the prices of electric and conventional vehicles the effect of a ban on new petrol and diesel vehicles from 2030 is likely to be vehicle purchases being accelerated or deferred. There is no scrapping incentive and it has to be assumed that when people do buy electric vehicles, they will want to trade-in their existing vehicles in the normal way. Those vehicles will therefore remain in use, either on the Island or in another jurisdiction.

The target of decarbonising 67% of vehicles by 2030 is unrealistic – the best estimate, with incentives, is about 23%.

Substantially increasing the tax on fossil fuel is essential if the targets are to be pursued, but in 2022 the Government decided to freeze the tax.

A Sustainable Transport Roadmap was scheduled for 2022 Q4 and then for July 2023. Both deadlines have been missed.

The Carbon Neutral Roadmap states that "each policy is supported by a range of detailed analysis and impact appraisals". This statement is not correct. There is no detailed analysis or impact appraisals of the key policies. Substantive evidence from industry bodies and consultants in respect of the targets for electric vehicles was ignored. Comments on social media were given more weight than hard evidence.

The policy-making process did not work for a number of reasons but principally the failure to take account of the costs and practicalities of various proposals. Rather, "wish lists" were produced with the assumption seeming to be made that the end is sufficient to ensure the means. No research was done on the willingness of people to meet the costs of decarbonising – as opposed to support for incentives.

These deficiencies are not unique to the Carbon Neutral Roadmap, but rather are endemic in Jersey's policy-making process. Analysis and evidence are given insufficient weight and views expressed on social media are given too much weight. The result is poor policy-making, which is costly and ineffective.

Better policy-making requires –

- Public consultation is vital but needs to be informed and should take place only when initial analysis has been completed and meaningful options can be considered.
- Public consultation is not a matter of counting votes and giving equal weight to all comments. Well-informed and evidence-based comments, from whatever source, should be given greatest weight. Public opinion surveys should be structured so as to ensure a representative response.
- Proposals must be accompanied by proper analysis of practicalities, costs and benefits.
- Policies must be clearly and succinctly presented.
- There needs to be more effective scrutiny. Assembly scrutiny panels need to be supported by people with the necessary skills, and on major issues a suitably qualified consultant should be commissioned to do a reality check.

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These in turn require a change in mind-set within Government and the Assembly with much greater emphasis on the practicality and possible consequences of policy measures, rather than the short-term political attractiveness of an idea.

The context

On 27 February 2022 the Intergovernmental Panel on Climate Change published Climate Change 2022. Impacts, Adaptation and Vulnerability. Two quotes from the report usefully summarise the position -

> Human-induced climate change, including more frequent and intense extreme events, has caused widespread adverse impacts and related losses and damages to nature and people, beyond natural climate variability. Some development and adaptation efforts have reduced vulnerability. Across sectors and regions the most vulnerable people and systems are observed to be disproportionately affected. The rise in weather and climate extremes has led to some irreversible impacts as natural and human systems are pushed beyond their ability to adapt. (*high confidence*).
>
> Global warming, reaching 1.5°C in the near-term, would cause unavoidable increases in multiple climate hazards and present multiple risks to ecosystems and humans (*very high confidence*). The

> level of risk will depend on concurrent near-term trends in vulnerability, exposure, level of socioeconomic development and adaptation *(high confidence)*. Near-term actions that limit global warming to close to 1.5°C would substantially reduce projected losses and damages related to climate change in human systems and ecosystems, compared to higher warming levels, but cannot eliminate them all (*very high confidence*).

There is not 100% agreement on the science – there never is. But the overwhelming weight of scientific opinion is in line with these comments.

In 2006, through the Paris Agreement on Climate Change, countries agreed to take action to limit global warming to well below 2°C, preferably to 1.5°C, compared to pre-industrial levels. The overall objective is to achieve a carbon neutral world by mid-century. The 2006 Climate Change Act commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels by 2050.

There is then a question of whether a tiny community, with relatively low carbon emissions, should take costly action in the knowledge that this would have zero effect on tackling the overall problem. This argument has been advanced by some in Jersey. But it applies to any community of 100,000 people, not just an island, and if every community took the view that it was too small to make a difference then clearly nothing would be done.

Jersey seeks to play its part in global issues and the States Assembly has committed Jersey to comply with agreed international action.

Current policy

The Carbon Neutral Strategy, agreed the States Assembly in February 2020, set out the context for the strategy and five guiding principles to Jersey's approach to carbon neutrality -

- A strategic focus on all emissions
- Work within a definition of carbon neutrality
- High standards in the use of carbon offsetting
- Making sure that everyone can play their part
- Carbon neutrality policies do not overall increase income inequality

In April 2022 the States Assembly agreed the Carbon Neutral Roadmap (CNR). The objective is "at a minimum reduce emissions by 68% compared to the 1990 baseline by 2030, and reduce them to 78% from baseline by 2035". The Roadmap set out a series of targets and deadlines in order to meet this commitment. This wording is at best convoluted and it is unfortunate that the CNR did not include a table of relevant figures or explain what is required going forward rather from 1990. In fact, Jersey

has made considerable progress in reducing emissions – a 46% reduction between 1990 and 2021, an annual rate of about 2%. To achieve the 2030 target requires a 30% reduction from the 2021 figure, an annual rate of about 5%.

Currently, 28% of emissions come from road transport, 21% from residential buildings, 15% from business, 14% from aviation and 12% from energy production and distribution. The Carbon Neutral Strategy correctly commented that "any viable route to carbon neutrality by 2030……will require the rapid electrification of a large proportion of road transport and space heating in Jersey". The Strategy envisaged a cost to Government of up to £300 million – which can be translated into £6,500 tax per household.

The key targets to be met by 2030 are –

- End registration of new petrol and diesel cars and small vans.
- 67% of vehicle decarbonised.
- 75% of domestic and 50% of commercial fossil fuel boilers decarbonised.

There are many other targets but these three are by far the most important in achieving the emission reductions by 2030 and it is therefore appropriate to concentrate on them. The following sections analyse the practicality of the targets and what would need to be done to achieve them.

Domestic heating

The target set out in the CNR is by 2030 to covert 16,000 out of 21,559 domestic boilers to non-fossil fuels. 16,000 means about one third of all households. Heat pumps are the most practical option. These currently cost £7,000 - £13,000 for air heat pumps and around £24,000 for ground heat pumps. Electric flow boilers are an alternative in some cases and are significantly cheaper.

So how realistic is this target?

There is now a target of 1,000 switches by the end of 2025, an annual rate of 400. The current Government budget for this is £5.7 million, with individual households paying around £5 million. This implies an annual rate of 3,000 (and an annual cost of over £30 million) for the rest of the decade. The payback period depends crucially on the price of the current fuel being used; the higher the price the shorter the payback period. For the UK the payback period is estimated to be ten years. The CNR and supporting documents give no indication of the period for Jersey under alternative assumptions for the price of oil. In the absence of such an analysis a ten-year period can be assumed. It seems very unlikely that

nearly one third of Jersey households will pay an average of perhaps £10,000 (directly or in taxation) for something that will take ten years to pay for itself.

The CNR provided for an incentive scheme to be in place by the end of 2022. It was not. The incentive was launched on 15 May 2023. It provides up to £5,000 of match funding for domestic owner-occupiers to replace oil or gas boilers with low carbon heating systems. For those meeting the low-income eligibility criteria, £10,000 of funding is available without the need to match fund. However, funding is currently available for only 1,000 grants by 2025 and it is not clear whether any funding will be available subsequently.

It is worth noting that the UK target is for 21 heat pump installations per 1,000 households by 2028. Only 2.5 per 1,000 households was achieved in 2022. Jersey's target for all forms of fossil free heating systems is three times as high - 66 installations per 1,000 households from 2026.

The higher the cost of fossil fuels the greater the incentive to switch to non-fossil fuels, hence increasing the tax on oil is an appropriate measure. However, in 2022 the government decided to freeze oil duties so as to help ease cost of living pressures.

The target will not be achieved in the absence of a combination of a significant increase in the tax on oil and a far more generous incentive scheme, which in turn would have to be financed by tax revenue. Nowhere in the many documents that support the CNR is there any analysis of what needs to be done in order to achieve the target. Rather, the assumption seems to have been that setting the target together with a modest incentive scheme is sufficient.

Commercial heating

The CNR estimated that there are 3,415 commercial properties with fossil fuel boilers and set a target to convert 1,700 by 2030. The analysis in respect of domestic heating applies equally to commercial heating. The incentive scheme does not currently apply to commercial properties but it is intended that it should do so from later in 2023.

Ban on registration of new petrol and diesel vehicles

Jersey has mirrored the UK in announcing a ban on the registration of new petrol and diesel vehicles from 2030. In practice, Jersey has little choice other than to adopt the UK position given the nature of the Island's motor market. The EU has adopted a later target of 2035. There is concern in the EU that meeting the 2035 target would be seriously damaging to the European motor industry and a widespread view that the UK 2030 target is unrealistic and in due course will be changed. However, Jersey has done

the sensible thing, which is to adopt the UK target and in due course will mirror any changes in that target.

It may be tempting to think that the effect of the ban would be that people who would otherwise have bought petrol or diesel vehicles from 2030 would buy electric vehicles instead. This is simplistic. The average life of a vehicle is over 20 years and people have a choice as to when to buy a vehicle for the first time, to buy an additional vehicle or to replace their vehicle. The crucial point is the price gap between electric and conventional vehicles. There is no precise information on what this is in Jersey. The Government website does give some information on running costs but not capital costs –

> The outright cost of an EV is higher than a conventional car. However, you can save money on running costs with an EV.
>
> Fuel costs
> According to the Review into Fuel Prices in Jersey 2022, the average driver in Jersey spends between £960 to £1,440 on fuel each year, which means that EV drivers can save between £480 to £720 in fuel costs.

There is an expectation that the price gap between electric and petrol vehicles will narrow, partially depending on the tax on new vehicles. If people who would be looking to buy or change their vehicle from 2030 believe that the price gap is too high then they have several options including –

- Accelerating the purchase of a new petrol or diesel vehicle to 2028 or 2029.
- Deferring the purchase of a new vehicle to 2031 or later.

The policy may therefore lead to an increase in petrol and diesel vehicle sales up to 2030 followed by reduced sales for a few years.

There is then the question of what happens to existing petrol and diesel vehicles. There is no scrapping incentive and it has to be assumed that people will want to trade-in their existing vehicles in the normal way. Those vehicles will therefore remain in use, either on the Island or in another jurisdiction. The overall effect could well be an increase in the total number of vehicles. The price of second hand conventional vehicles may well fall so increasing the demand.

There are two further relevant points but for which detailed analysis is outside the scope of this paper –

- Scrapping vehicles before the end of their useful lives is itself environmentally unfriendly.
- Electric vehicles are much heavier than normal vehicles and the construction of them itself generates emissions. vehicles in Jersey do less mileage than in the UK suggesting that the ratio of reduced carbon emissions from electric vehicles to the emissions involved in constructing them is lower. Replacing a petrol or diesel vehicle that does 20,000 miles a year by an electric vehicle has a much greater effect on emissions than if the vehicle does 2,000 miles a year.

There are all fairly obvious points but there is no analysis of them in the CNR or the accompanying reports. There are relevant UK and other studies that can be drawn on, but no attempt has been made to use these.

Shifting the vehicle fleet to non-fossil fuels

The CNR states "in order to achieve a 68% reduction in the Island's total carbon emissions by 2030 the target is to shift 67% of the Island's fleet away from fossil fuels by 2030". The UK industry body, the Society of Motor Manufacturers and Traders, estimates that by mid-2035 46% of cars on the roads could be zero emission under a central scenario. A report by PwC on the Distributional Impacts of the Carbon Neutral Strategy suggested that with no incentives electric vehicles would account for 13% of the Jersey fleet by 2030, and with support 23%. Clearly, shifting the Jersey 2030 proportion from 13% to 67% is hugely ambitious. Some basic calculations show just how ambitious it is –

- There are around 128,000 vehicles registered in Jersey. 68,00 of these are cars or vans used by private households and the remaining 60,000 are commercial vehicles. As at December 2021, 1,365 (1.1% were electric).
- Assuming that the total number is unchanged by 2030 the 67% target means that 86,000 would need to be electric.
- Assuming that there are currently 4,000 electric vehicles, this assumes 82,000 new purchases of electric vehicles and the same number of petrol vehicles being removed from Jersey. 82,000 means around 10,000 a year. New vehicle registrations totalled 5,181 in 2021. So to achieve the target means that in practice there should be no new registrations of petrol and diesel vehicles and that the number of new vehicles registered (all electric) and old vehicles deregistered would double. Clearly this is not going to happen. It is worth noting that the Citizens Assembly report recommended that "no new registration of fossil fuel vehicles after 2025" and a scrappage scheme.

Again, the CNR has no analysis on this point – not even a mention of how many new vehicles are registered each year, let alone any reconciliation with the PwC figures.

It is worth noting here the comments of the Jersey Motor Trades Federation on the figures in the draft Roadmap -

> However, the assumptions made in the document [the draft Carbon Neutral Roadmap, which had the same assumptions as in the final version] are incredible. Within three years, 34 per cent of vehicles on the Island will be EVs is unrealistic and is unlikely to be achieved even by 2030. The DVSD confirmed that they had 127,661 vehicles on their register at the end of 2021, of which just 1,365 were EVs. To achieve a figure of 34 per cent of registrations by 2025, 42,039 EVs will have to be imported (equating to more than 14,000 per year) at the same time as dealers will still be legitimately importing new fossil-fuelled vehicles.
>
> Below is a table [not reproduced] of new and used (pre-registered) vehicles imported for the last five years, which shows an average of 6,031 per annum. We have no idea how this is going to increase to more than 14,000 per annum. Even if this figure was achievable, we do not believe that the manufacturers will be in a position to supply this number of EV vehicles.

This is sound evidence from the relevant trade body, but it is significant that it was not mentioned in the summary of the consultation responses.

The CNR said that the government would bring forward in 2022, in time for potential inclusion in the Government Plan 2023, "proposals for new economic instruments that generate income ring-fenced (in whole or in part) in the following areas –

- Road user charges
- Reinvestigation of commercial solid waste charges
- Travel duty"

and

> "bring forward in 2023, in time for potential inclusion in the Government Plan 2024, a long-term financing strategy that considers all available options to continue to fund the decarbonisation of the economy at the pace required to achieve the emissions trajectory established in the Carbon Neutral Roadmap."

In the event there were no proposals brought forward in 2022 and as yet the long term strategy has not been published.

A report that the Government commissioned from the consultants Oxera listed four policy measures for decarbonising transport –

- Measure 1: substantially increasing existing fuel taxes to discourage the use of petrol and diesel vehicles.
- Measure 2: imposing a ban on the registration of fossil fuel vehicles. To the extent that diesel vehicles can immediately transition to the use of HVO (see Measure 4) while maintaining a sufficiently low emission intensity, they can be made exempt from the ban.
- Measure 3: providing financial incentive(s) for the purchase of EVs, either in the form of a purchase grant, and/or in the form of a scrappage payment to owners of fossil fuel vehicles.
- Measure 4: facilitating the use of second-generation biofuel, such as HVO, for all diesel vehicles, subject to further technical due diligence of the feasibility of such a transition in Jersey. This would involve granting HVO an exemption from fuel taxation.

Oxera estimated that the cost of a ban on new fossil fuel vehicles and incentives would be £98-146 million.

On measure 1 the only action of the government in the 2022 Government Plan was "To help with the ongoing cost of living impacts, Ministers propose to freeze fuel duty for all types of road fuel in 2023".

On measure 3 the concept of a scrappage scheme has been scrapped. In respect of the incentive to purchase EVs the CNR set out the following -

- A subsidy of 35% of the purchase costs of the electric vehicle, or £3,500 (whichever is lower).
- The subsidy will only be available for vehicles with a purchase price under £30,000.
- The subsidy is expected to run from 2022 to the end of 2027. The maximum value of the subsidy will be reduced periodically starting at £3,500 in 2022 and expected to reduce to £2,000 by 2027.
- A four year budget £4,434,000, sufficient to cover 1,200 vehicles.

The incentive scheme was introduced on 29 August 2023. It is broadly as set out in the CNR although the maximum purchase price has been increased to £40,000. There is no indication of a maximum budget for the scheme. However, the Climate Emergency Fund, from which this and other initiatives are funded, allows for expenditure of £6.3 million in 2023 and £6.4 million in 2024, suggesting that the four-year budget figure covering 1,200 vehicles still stands.

It should also be noted that an incentive scheme for purchasing electric bikes has been introduced and was included in a progress report on the CNR under the heading of "Speeding up adoption of electric vehicles". There is no mention of electric bikes in the CNR and the scheme has no relevance to the speeding up of the adoption of electric vehicles.

There is some wishful thinking in the proposals. The 35% subsidy sounds attractive but there is a limit of £3,500 – to be progressively reduced. There are no new electric vehicles for sale at £10,000 so no one will get a 35% subsidy. Indeed there are currently few electric vehicles for under £20,000. And there is only funding for around 300 vehicles a year.

Currently, the high price of electric vehicles means that the vast majority are purchased by higher income people. The subsidy will not benefit the lower paid, who typically buy second-hand cars or who do not have cars. This point was made in a report by PwC on the Distributional Impacts of the Carbon Neutral Strategy.

> This policy could benefit middle and higher income households and could exclude marginalised groups such as low income households, older adults, people with disabilities, ethnic minorities and people of colour. This will primarily impact wealth inequality with middle and higher income households purchasing the expensive assets using government subsidy.

To be successful the policy must cause more people to purchase electric vehicles than would have been the case without the subsidy. There is no analysis on this. It is quite possible that the main effect will be to provide a subsidy to those who would have purchased electric vehicles anyway.

On measure 4 the policy has been paused.

The policy also requires "substantial annual increase in VED [vehicle emissions duty] to be set out in each Government plan". This was duly done in the 2022 Government Plan when duties were increased by between 30% and 85%. The duty is levied on vehicles other than electric vehicles on a sliding scale rising to £6,105 for the vehicles with the greatest emissions. The Government plan forecast that VED will be constant at £4,337,000 from 2023 to 2026, an average of about £1,000 a vehicle, a long way from compensating for the higher cost of electric vehicles. The PwC report said that "the typical additional marginal cost of new electric vehicles is estimated to be between £12,000 and £16,500 when compared with new petrol or diesel (ICE) equivalents based on EU data".

The 2030 target of 67% of vehicles being shifted away from fossil fuels by 2030 was never attainable. This was clear at the time the CNR was agreed.

Sustainable transport policy

Successive governments have struggled with articulating a joined-up policy on transport. The Government website page on States reports lists –

- Jersey's sustainable transport policy (2010)
- Sustainable travel progress report (2015)

- Sustainable transport policy (2019)
- Second interim report on sustainable transport policy (2021).

(An interim report was published in 2020 but is not listed on the website.)

These documents appear not to have been sustainable (to be pedantic the titles should be "Policy on sustainable transport").

The CNR said that the Government would "bring forward the Sustainable Transport Roadmap to the States Assembly by the Q4 of 2022". This did not happen. A progress report published on 18 July 2023 stated that this has now been renamed "Sustainable Transport Policy" and would be published by 24 July – six days later. 24 July has come and gone and it has not been published.

To be in line with the CNR the Policy will need to set out how the 67% target for electric vehicles by 2030 will be pursued, which must inevitably include –

- Substantial increases in fuel duty.
- Substantial increases in VED for petrol and diesel vehicles.
- A far more generous incentive scheme for buying electric vehicles.
- A scrappage scheme.

A target on number of vehicles is of course the wrong one. What matters is mileage. So to achieve the emissions reduction target (as opposed to the electric vehicles target) the following measures will also be needed –

- A substantial increase in car parking charges.
- A greatly enhanced bus service.

In her forward to the CNR the then assistant minister said: "Difficult decisions are needed but we should not shy away from making them" and "the time to act is now and we cannot delay". The Sustainable Transport Policy will be the test of this.

Failure to use appropriate analysis

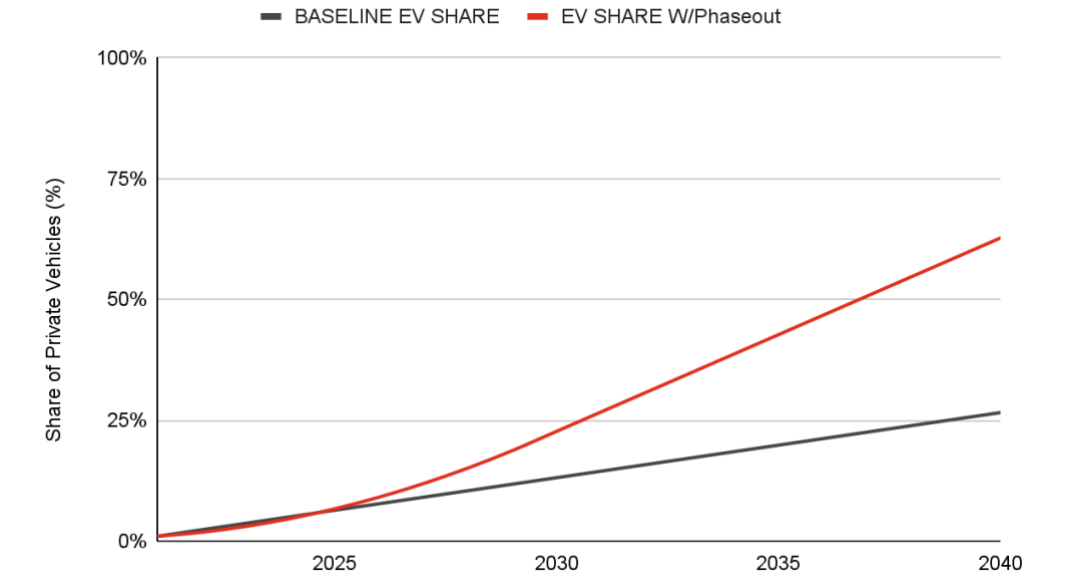
Paragraph 10.3 of the CNR states that "each policy is supported by a range of detailed analysis and impact appraisals". This statement is not correct. There is no detailed analysis of the key policies covered in this paper. The Evidence base lists just two impact assessments –

- Impact assessment: United Nations Convention on the Rights of the Child, March 2022.
- Distributional Impacts of Jersey's Carbon Neutral Roadmap – PwC Report, March 2022.

The PwC report was specifically on distributional impacts. Indeed it makes the point explicitly –

> The analysis in this section is focused purely on the effects these policies might have on inequality and fairness, and not each policy's carbon abatement, feasibility, affordability, or broader MCA [multi-criteria analysis] score.

The PwC report does contain a graph that is relevant to the 67% target of vehicles being decarbonised by 2030. This is reproduced below.



Source: TAG forecasts, Jersey car ownership data, PwC analysis

The graph shows that even with the phaseout of petrol and diesel vehicles the share of electric vehicles in 2030 would be just 23%. Nowhere, in all the documentation, is there any analysis of how this 23% can be increased to 67%.

The Jersey Motor Trades Federation evidence has already been quoted. The summary of responses to the draft CNR did not mention its view that that the assumptions were "incredible" nor did it refer to the statistics that the Federation quoted.

So relevant evidence that was available was simply ignored. And there was no analysis to support the stated targets. Such analysis is easy to do using available Jersey data and analysis from the UK and other jurisdictions.

Value for money

Substantial amounts of money have been spent on the CNR -

- £190,000 for the Citizens Assembly. The Public Accounts Committee noted that this was more than double the original cost provided to it.
- £200,000 for the remainder of "Jersey's Climate Conversation deliberative process".
- £270,000 to the consultants Oxera for four separate reports.
- £50,000 to the consultants PwC.
- £119,000 for internal costs of producing the strategy.

In addition to these costs much time was spent by Assembly members, ministers and officials and by businesses and others in responding to consultations.

The consultants' reports include some useful analysis and collectively provide the evidence that policy-makers needed to make informed decisions on the policies necessary to pursue Jersey's objectives in respect of carbon emissions. However, the policy-makers have not taken sufficient account of the evidence and as a result have announced targets that are not capable of being achieved and failed to progress key policies to reduce carbon emissions – in particular reducing the use of fossil-fuel vehicles through a transport policy that is compatible with the CNR.

Why the policy making process did not work

The policy-making process did not work for a number of reasons but principally the failure to take account of the costs and practicalities of various proposals. Rather, "wish lists" were produced with the assumption seeming to be made that the end is sufficient to ensure the means. There are references to a "people-powered approach" but this did not extend to asking people whether they were willing to pay the costs that would result from the various proposals.

it would have been sensible to do consumer research, either through focus groups or opinion surveys. The consultation response did quote the results of some surveys, for example –

> To what extent do you agree that a financial incentive should be provided to encourage people to buy an electric vehicle – 76% support.
>
> To what extent do you agree that a financial incentive should be provided to encourage people to change their heating system – 78% support.

These figures are not surprising. Encouraged by politicians, people simply do not associate "providing an incentive" with "paying tax". More meaningful questions would have included –

- Is your household willing to pay an additional £6,000 in direct expenditure and tax so as to enable Jersey to meet its carbon neutral target?
- Is your household willing to spend £10,000 to change your heating system away from using oil?
- Are you prepared to replace your current car with an electric car in the next five years, accepting that it will cost [20]% more.

Such questions will be the ones that matter in the years ahead. Quite possibly the responses would be fairly negative on all three questions, but this would give a good indication of what needs to be done to get public support for the policy and would also help refine policies, in particular in respect of the balance between people paying directly to reduce carbon emissions or people paying through higher taxation.

In this context it is worth noting an Opinion survey conducted by YouGov for *The Times* in July 2023.

- 71% supported the aim to reduce Britain's carbon emissions to Net Zero by 2050.
- But 55% supported policies to reduce carbon emissions only if they do not result in additional costs for "ordinary people".

More generally, the consultation process gave undue weight to instant social media comments and insufficient weight to informed opinion. For example the Consultation Report has five pages setting out views given by individuals including "I would rather cut my own legs off with a spoon than buy an electric car". However, it declined to mention the Jersey Motor Trades Federation comments, mentioned on page 8, on the impracticality of the targets for electric vehicles. The Federation's submission also stated that –

> We must place on record that at the beginning of 2020 we were given a firm undertaking by the Infrastructure Minister in person that this Federation, representing as it does the significant proportion of motor traders, particularly franchise holders for new vehicles, would be consulted in depth in compliance with its standing as a 'major stakeholder'. Such consultation has never taken place, and while we accept that the advent of the coronavirus has impeded many deliberations, we are extremely disappointed to note that the views of a number of organisations whose interest is either peripheral or factional have been duly noted. However, no further involvement has been invited from the trade body whose contribution to the Island's economy is considerable and on whose viability many hundreds of local people, highly skilled and otherwise, rely for their livelihood and wellbeing. It is pretty clear that had such consultation taken place, many of the highly speculative and quite

> unrealistic SMART objectives, assumptions and dependencies contained in the Consultation Draft would have been avoided or radically changed.

Part of the policy-making process was a Citizens' Assembly. The concept is tried and tested and can work well if properly set up and managed. Their particular value is in enabling a discussion on different options and trade-offs. The mandate for the Citizens Assembly on climate change included "The implications and trade-offs of a range of scenarios for achieving carbon neutrality". The report of the Assembly to the States Assembly gives little indication of any discussion about trade-offs or of the costs and practicalities of its various proposals. Rather, there are 63 recommendations with virtually no consideration of costs but regular references to grants, loans, subsidies, tax breaks etc.

The report does say -

> We are aware that there is a cost implication to our recommendations, for the replacement of vehicles, the cost of fuel alternatives, the cost of providing and maintaining the necessary infrastructure
>
> We are aware that these recommendations may lead to an increase in the tax payable by Islanders, or the introduction of fees elsewhere, to fund the transition, but the funding should not fall to the taxpayer alone.

However, there is little to indicate that the cost implications were taken into account and what the reference to "funding should not fall to the taxpayer alone" means is not clear.

The recommendations included –

- Ban registration of new petrol/diesel vehicles (all personal and commercial vehicles) from 2025 that includes a scrappage scheme for diesel/petrol vehicles with particular emphasis on higher polluting vehicles.
- Increase the self-sustainability of the island to reduce the need for air and sea freight of goods.
- Immediately revise residential tenancy law in order to ensure that costs of energy efficiency measures may not be passed on to the tenant.
- Give fuel suppliers until 2025 to change to a renewable energy supply. Current oil customers have to change to HVO fuel by 2025 as an interim measure until their heating/cooking/boiler needs replacing.

- All residential houses to have an EPC from an approved supplier, together with a costed action plan by 2025 to achieve carbon neutrality.
- Reduce the number of personal air travel trips targeting frequent flyers using a quota system that gets more expensive the more you do it.
- Government to restrict the size of cars in Jersey and the number of cars allowed.
- Introduce a limit on the total number of private cars (including electric cars) on the island and cars per household (as population increases).
- Legislation for rental properties to include an energy performance certificate (EPCs) with properties required to meet a minimum grade before being leased.

Improving the policy-making process

The deficiencies covered in this paper are not unique to the Carbon Neutral Roadmap, but rather are endemic in Jersey's policy-making process. Analysis and evidence are given insufficient weight and views expressed on social media are given too much weight. The result is poor policy-making, which is costly and ineffective.

Better policy-making requires a change in mind-set within Government and the Assembly with much greater emphasis on the practicality and possible consequences of policy measures, rather than the short-term political attractiveness of an idea.

Five specific actions are needed -

- Public consultation is vital but needs to be informed and should take place only when initial analysis has been completed and meaningful options can be considered.
- Public consultation is not a matter of counting votes and giving equal weight to all comments. Well-informed and evidence-based comments, from whatever source, should be given greatest weight. Public opinion surveys should be structured so as to ensure a representative response. Focus groups and citizens' assemblies have an important role to play but must be properly managed and concentrate on considering trade-offs.
- Proposals must be accompanied by proper analysis of practicalities, costs and benefits.
- Policies must be clearly and succinctly presented. The Roadmap is 163 pages long, discursive and full of jargon. The actual roadmap, that is a timetable of actions, is Appendix 3, beginning of P.150. The key 67% target for electric vehicles by 2030 is covered in one sentence on P.90.

- There needs to be more effective scrutiny. Assembly scrutiny panels need to be supported by people with the necessary skills, and on major issues a suitable qualified consultant should be commissioned to do a reality check.

None of these are difficult. They are standard practice in other jurisdictions and there are templates and models that can be applied in Jersey.

Conclusions

Tackling climate change is vital and it is proper that Jersey is seeking to "do its bit". But the people of Jersey are entitled to expect that their politicians will be honest with them about the costs and that policy measures are introduced only after an appropriate analysis of their practicality and the likely costs and benefits. In respect of climate change those expectations have not been met.