NAO CCL/CCA Review – Sector Association Questionnaire

1.1 The National Audit Office (NAO) is preparing a briefing on the Climate Change Levy and Climate Change Agreements (CCL/CCAs) policy package for the Environmental Audit Select Committee of the House of Commons. The purpose of this questionnaire is to set out the information that the NAO is seeking from the Sector Associations to inform this process.

1.2 The main focus of the NAO work is to examine the factors driving investment in energy efficiency and the role of the CCL/CCAs in this respect – in particular, the extent of additional investment and carbon reductions which can be attributed to this policy instrument. It is also to examine administrative aspects of the CCL and CCAs, including compliance costs.

1.3 The following sets out the questions for which we are inviting comments from you based on your experiences of working with companies in your sector and with Defra in relation to the CCA negotiations.

1.4 There are two elements to this questionnaire. First there are a series of open questions asking for your comments. Secondly there are a series of multiple choice statements and responses that we are asking you to complete. Throughout the questionnaire if the response differs between companies please illustrate this with examples.

1.5 Throughout the questionnaire we are asking generally about efficiency improvements, emissions reductions, costs etc. The focus of the work is the CCL/CCA influence so we have to try to get to the proportion that directly relates to the CCL/CCA. The purpose is to assess the effectiveness of this policy package at stimulating change.

1.6 Please note that we are reviewing the period from the start of this scheme to now (whilst also gathering opinions about the future) and need to support statements and opinions as far as is possible with evidence/data.

1.7 Please contact Simon Critten at RPS on crittens@rpsgroup.com or 01273 546800 if you have any queries. Please return this questionnaire by Wednesday 21st February 2007. We want to develop a fair reflection of the actual process from your perspective. Many of the questions are intended to gather opinions and experiences, supported by examples where possible, of the CCA process to date. We thank you in advance for your time and efforts in supporting this process.

AREA 1: General Overview

1	Please describe your role in the CCA negotiations/operation, and any specific roles relating to both DEFRA contact and company contact/advice relating to energy efficiency and emissions investment.
The British Cement Association has an umbrella CCA agreement with Defra; this agreement contains the sector targets. As such each cement manufacturing company in the UK has an underlying agreement with Defra containing their own targets in relation to their 'target units'. Additionally BCA has a participation agreement with each cement manufacturer concerning the roles of both parties in terms of data provision and processing. To oversee the cement sector agreement the BCA has a climate change working group. The group covers all issues relating to CCA, emissions trading, energy efficiency and fuels. Investment decisions are however, a member company specific issue and many investment decisions in the UK cement sector are made overseas by the multinational parent companies.	
2	In general terms please describe coverage of the CCA for your sector. How representative of your sector is this coverage? What is the estimated proportions of companies and emissions that your CCA(s) covers?
The BCA umbrella agreement includes 100% of the installations that manufacture cement clinker in the UK. As such the BCA agreement includes all CCA related emissions.	
3	If you have a CCA please describe the basis of your targets and performance in relation to these. [Note that we have requested data in relation to energy use and emissions as detailed in our separate data request.]
The cement industry targets are relative energy. This includes traditional fossil fuel energy and electrical energy per tonne of cement produced. Alternative fuel (e.g. waste and biomass) energy is excluded.	
4	In your opinion why did/do the companies join/maintain involvement in the CCA?
The cost to cement manufacture of achieving the 80% CCL rebate meant that joining a CCA and meeting the targets was essential for the continued manufacture of cement in the UK.	

AREA 2: Management Attitudes and Investment Decisions

This area is intended to explore your take on the factors driving investment in energy efficiency and emissions reductions that have taken place over the last 6 years; and the extent to which the CCL and/or CCAs has stimulated investment over and above that which would otherwise have taken place.

5	In your opinion what are the key drivers in emissions reduction and energy efficiency investments (for example, energy costs, EU ETS, CCA compliance, shareholder pressure)? What would you say was the magnitude/proportion of the influence of the CCA/CCL in these decisions?

Energy represents an increasing proportion of the variable cost of cement manufacture (>35%). It is therefore a primary concern of the industry to take all cost effective measures to improve energy efficiency and thereby reduce its emissions of carbon dioxide. Energy costs are therefore the primary driver for energy efficient investments. The CCAs have provided an incentive for investment in alternative fuels in the cement industry as all alternative fuels (both non bio mass and bio mass based) are considered 'carbon neutral'. However, in the EU ETS only biomass fuels are considered carbon neutral and as such EU ETS is less likely to drive the replacement of traditional fossil fuels with non bio mass based fuels and as such does not incentive the industry to maintain this waste disposal route. The UK cement industry is mainly owned by large multinational companies and key investment decisions in the cement industry are generally taken outside of the UK. If the supply of cement from developing countries is not subject to the same pressures to address climate change as the UK then investment (and emissions) will be displaced.

The irony is that the UK and EU could meet its climate change targets by the displacement of industry overseas. To address this, UK government should not base its climate change policies on UK emissions alone. Rather it also should consider the emissions generated from imported products consumed in the UK.

6	Please describe whether/how these drivers may have changed or the balance of influence between the drivers may have changed over the past 6-years? Can you envisage any additional changes in the future?

As described in the answer to question 5 the drivers for fossil fuel replacement differ between the climate change measures affecting the UK cement industry. The differential treatment of alternative fuels in the EU ETS when compared to CCA has caused tensions between policy measures that will result in sub-optimal outcomes for industry and the environment. To reconcile these conflicts the UK government should provide the CCL discount to those installations participating in EU ETS and remove the need for climate change agreements and thus remove the double regulatory burden that currently exists with the overlap between CCA and EU ETS for EU-ETS participating industries.

7	Within your sector what energy efficiency improvements/emissions reductions have occurred over the past 6 years as a direct result of the CCL/CCA? If not solely the CCL/CCA please estimate the proportion of influence this package had?

Initially the CCA/CCL highlighted the importance of driving technological change in industry towards more efficient production. However, with the advent of the EU ETS the role of CCA has a limited use in the future for sectors covered by EU ETS. Significant investment has occurred in the last 6 years in the cement sector with the replacement or refurbishment of kilns, with the investment in equipment for the delivery reception storage preparation and combustion of alternative bio and non-bio fuels and with the move to promoting the use of extended cements thereby reducing CO2 intensity per tonne of cement produced. These investment decisions total around £300M although only a small fraction of the decision making and the energy efficiency improvements generated from these investments could be attributed to CCA/CCL. Energy prices have provided a greater incentive to improve energy efficiency. However it is true to say that if a mechanism had not been provided (CCAs) then the UK cement industry would have seen rapid closure rather than investment in technological change.

8	Would you say that greenhouse gas implications are a factor in decision-making (operations and investment)? What are the main reasons for this?

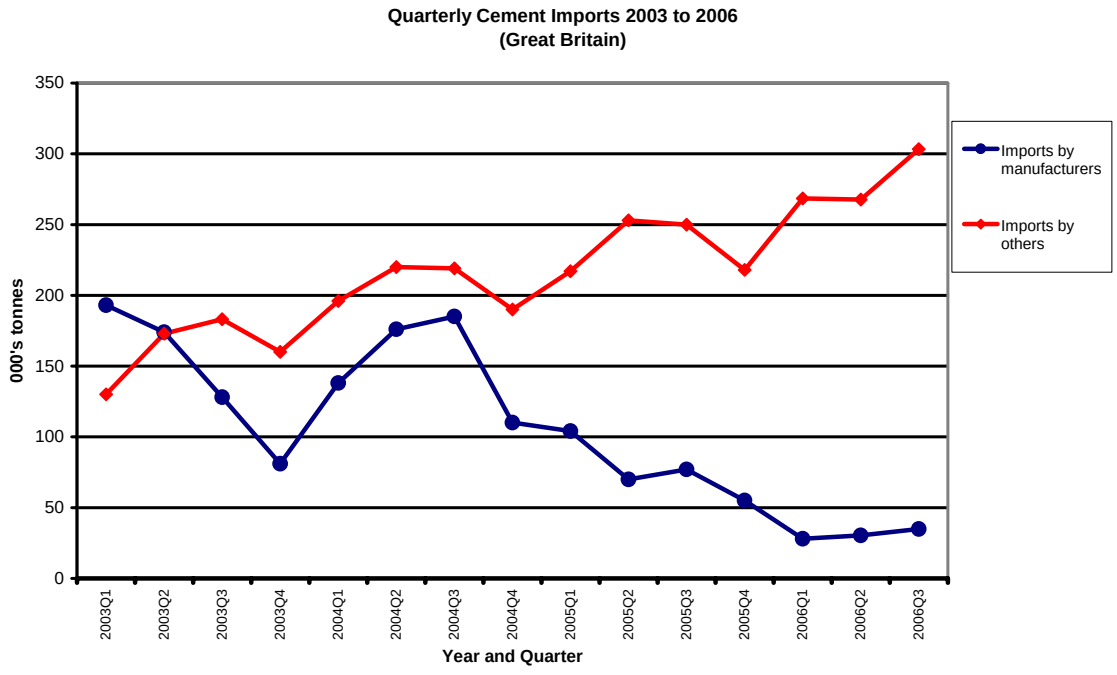
Yes, carbon dioxide is a key factor in decision making in the cement industry. For every 1 tonne of cement manufactured around 822 kg of CO2 is emitted. This means that the UK cement industry emits around 9.7 Mt CO2 per year. With the advent of the EU ETS CO2 emissions are now an even greater factor taking account of the price of EU allowances and the cost to manufacturers of emitting more than their allocation.

9	Given that the CCAs are currently scheduled to end in 2010 and expire in 2013 is this changing how your companies are treating the CCA reduced levy or approaching investment decisions? For example, is the general assumption that the CCA process will continue or be replaced by something similar? Is it being considered? Does this matter?

The cement industry is already subject to EU ETS and potentially related business may be subject to the proposed Energy Performance Commitment. Consequently there is no requirement for the CCAs to extend beyond 2010. The cement industry supports the principle of emissions trading. The cement industry has been one of the sectors in the vanguard of those addressing the challenges posed by climate change and the need to secure a more sustainable future for all. As such the UK cement industry supports a policy mix based around emissions trading and where there are no overlaps or conflicts with other climate change measures. If CCL remains in place then it is essential that the cement industry is provided with relief. We recommend that 100% relief be provided for those installations that are required to be part of the EU ETS.

10	Based on your experience has the CCL/CCA given your companies an advantage or penalised them in any way in comparison to their competition (particularly any international dimensions)? Please provide specific examples. For example, advantages could include benefits for being an early mover providing experience in developing and using newer technologies. Disadvantages could include increases in operational costs etc.

The CCL is UK based and cement is traded internationally. Since the inception of the CCL cement imports by non-UK manufacturers has increased and now total cement imports stand at around 10% of total UK consumption. Although the increase in imports cannot be directly attributed to CCL any differences between the pressures on the UK cement sector (particularly the increase in energy cost to UK based companies due to the 20% CCL each company has to pay even if the CCA targets are met) can be exploited by those outside of the UK not subject to the same pressures.



11	A macro-economic study of the CCL/CCA suggested that changes to operational practices and emissions reduction measures would have occurred regardless of the level of the tax. In other words this suggested that the announcement of the CCL/CCA led to changes in business attitudes? Based on your experience do you think that this occurred when the CCL/CCAs were

	announced? If so, please describe these changes and whether such changes been sustained over-time?
CCL/CCA represents only a small component of the driver for technological change in the cement industry. The investment cycle of the cement industry is comparatively long. It takes around 7 years to design, build and fully commission a cement kiln. The cement industry is committed to the replacement of old technology with new and more efficient kiln technologies. The UK cement industry is a significant way through delivering £500 million of investment over a ten year period; including a new £120M production facility for CEMEX UK Cement in Rugby; a new plant costing £110M, at Tunstead for Buxton Lime Industries (part of the Tarmac Group); and a new £54M kiln at Padeswood in North Wales for Castle Cement (part of the Heidelberg Group). Although other potentially large investments have been cancelled or postponed citing uncertainty in UK climate change policy as part of the reason [1,2].	
12	The climate policy has continued to evolve in the UK and there are a number of measures that have been introduced. Most notably this includes the EU Emissions Trading Scheme which when coupled with a background of generally increasing energy prices has been suggested as driving a significant chunk of energy efficiency improvements and emissions reductions. How do you think the CCL/CCA sits with these other measures in terms of driving investment in efficiency improvements or emissions reduction measures? How do you think the influence of the CCL/CCA will change in the future?
The EU Emissions Trading Scheme is in its infancy and, to date, only 2005 results have been published it is therefore premature to make any conclusions about its record in delivering energy efficiency improvement. We can be certain that for industries that are involved in the EU ETS that are not subject to international competition that these sectors will pass the cost on to customers. The increases in electricity prices is an example of this where the UK cement industry is paying twice for emissions reduction; once directly at the cement works and secondly as increased costs as the electricity supply sector pass through the full cost of emissions reduction. The cement sector is in favour of emissions trading but not in favour of the double regulation that currently exists with the overlap between CCA and EU ETS. As explained in the answer to question 9 there is significant overlap between climate change measures in the UK for example fossil fuel emissions are included in the EU ETS and the same fuel use is covered by the climate change agreements leading to the potential for double benefit or double penalty when it comes to selling or purchasing CO2. The double trading arrangements described in Defra guidance note CCA23 are extremely complex and unnecessary. Consequently the future of CCA should be to regulate the energy not covered by EU ETS. This could occur by removing all 'direct' energy from the cement sector targets leaving only electricity. However, EU ETS compliance would need to be designated as a method of achieving the CCL rebate and sector targets would need to be renegotiated with Government to account for the removal of direct energy.	
13	Has the CCA in any way affected the product mix produced at the companies included under your CCA(s)? (i.e. rather than just promoting efficiency of production of the product mix you'd have chosen anyway)
There are options for the cement sector to produce cement with lower clinker content (clinker being the energy intensive aspect of cement making). However, these options are limited due to; market acceptability, additional downstream processing (beneficiation) and; technical aspects of the application.	

[1] CEMEX UK Operations (14th March 2006) has announced that following the completion of a feasibility study, the company has suspended an application for planning permission for a new cement plant at Barrington, Cambridgeshire "due to uncertainty over the future of CO_2 strategy in the UK"..

[2] Lafarge Cement UK (21st May 2004) confirmed that it is delaying the development of its new cement works at Snodland in the Medway Valley

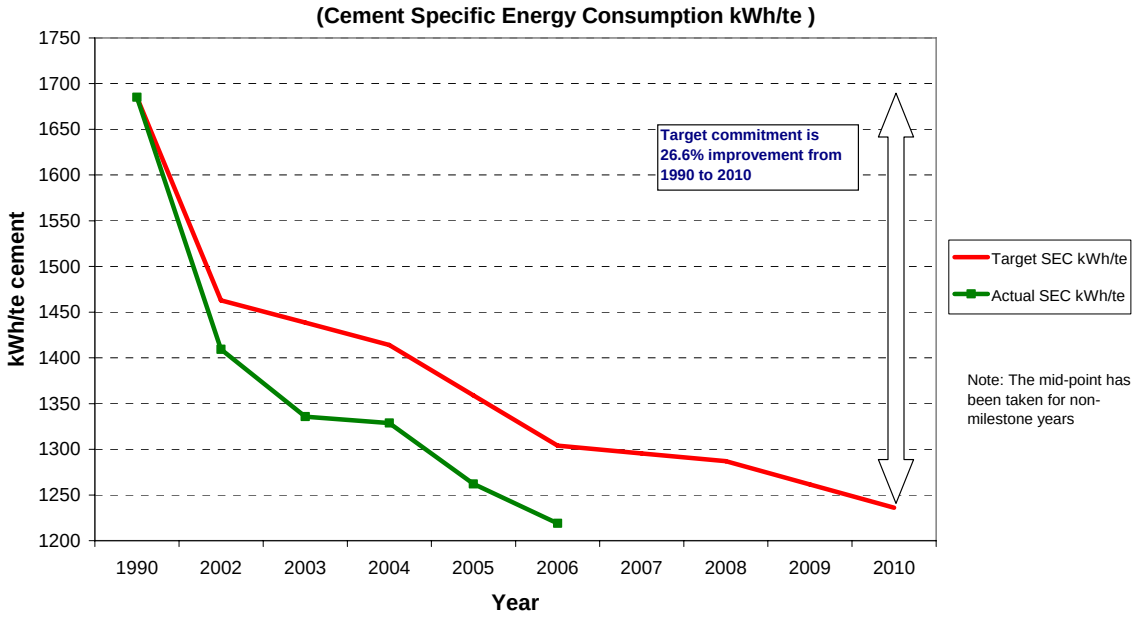
AREA 3: Emissions reductions and compliance

The intention of this topic area is to explore the extent to which businesses have successfully reduced total carbon emissions. In addition we would also like to discuss the extent to which organisations have been able to maintain compliance with their CCA targets (if applicable). The purpose of exploring this issue is to understand the extent to which the CCL/CCAs have actually led to real emissions reductions. We realise that much of this may be down to your judgement of the influence of the CCL/CCA package on decisions (including timing of actions) and how this has changed over time.

14	Has your sector always achieved the targets? Please provide details. In your opinion how difficult were the targets to achieve in terms of additional effort? How has this changed over time since the outset of this policy measure?

Yes the sector has always achieved its target; however, some target units within the sector have missed their target and needed to purchase allowances.
The sector target for 2010 is 1236 kWh/tonne of cement which represents a 26.6% improvement since 1990. The UK cement industry has performed well in the CCA so far by achieving a 27.7% improvement since 1990 based on preliminary 2006 MS3 results.

Climate Change Agreement Performance and Targets 1990 to 2010



15	What proportion of the improvements/reductions discussed above can be directly attributed to the CCL/CCA? Would improvements/reductions/investment have been achieved in the absence of the CCL/CCA? Did the CCL/CCA mean that improvement/investment decisions were made earlier than might have been the case without the policy package?

The cement industry investment described in the answer to question 11 was not wholly driven by CCA/CCL. It is likely that the energy efficiency changes in the industry would have been experienced in the absence of CCA/CCL. However, the ability of the industry to achieve its CCA targets and hence qualify for the CCL 80% rebate through the use of alternative waste fuels to replace fossil based primary fuels has given added incentive for investments in these technologies.

16	Have companies in your CCA taken advantage of the ability to buy and sell carbon credits? Is this something you have spoken to your sites about and would you say that this option has proved useful to your members? There have been some reports that some businesses have not used this option but instead implemented costly energy efficiency measures, is there evidence of this? Finally what barriers (perceived or real) would you say have affected the uptake of this option?.
The ability to buy and sell carbon credits to manage the risk of losing the climate change levy rebate is an important issue. Members of the cement sector climate change agreement have needed to buy allowances to meet their targets whereas some that have exceeded their targets have been in a selling position.	
17	What role, if any, do you play in monitoring the results of facilities within your sector and ensuring compliance with the terms of the Agreements?
The BCA monitors progress on the sector target by carrying out data 'dry runs' in the interim years of the biennial targets. This helps companies within the agreement to practice data collection and assess progress against their underlying targets.	

AREA 4: Operations and administration

This area is intended to explore the significance of the CCL and any CCA reductions/rebates available to companies. It is also important that the administrative requirements are considered and opinions sought as to whether these are reasonable especially in the context of CCAs.

18	Has the CCL had a big impact on the costs of operation for your members? Please provide examples where you think this has arisen.
Yes, the CCL is a cost that competing international suppliers of cement to the UK do not have to take into consideration in cement pricing. The answer to question 19 explains the direct cost of around £5M per year) but there are additional costs associated with the administration, monitoring and verification in order to provide resources for the scheme.	
19	Would you say that the CCA reduction/rebate translates into an amount of money significant to your members, i.e. is it big enough to drive change? Note we are seeking data to support statements in this area.
Yes, applied at the full levy rate the CCL costs the UK cement industry around £25M per year, with the 80% discount for meeting the sector targets this reduces to around £5M per year. This is a significant amount given that there are only 5 cement manufacturers in the UK	
20	Do you think that the anticipated rises in future energy costs will impact on the importance/influence of the CCL/CCA reductions/rebates? In your opinion will this change how your members treat the CCA?
The UK cement industry consumes around 50 petajoules of energy each year and energy represents an increasing proportion of variable costs >35% so the CCL rebate is extremely significant and important to retain for the UK cement sector otherwise the UK will become an even more attractive target for imports of cement.	
21	The CCL/CCA requires collection and management of data by your members, in your opinion are the costs associated with this reasonable in comparison to the benefits that they have for being involved? We need to understand how much it is costing companies to respond to this policy package in terms of establishing and maintaining systems, monitoring, reporting, verification (if applicable) and being in compliance.
CCAs do require significant monitoring, reporting and verification as does EU ETS. The costs are unreasonable as they are duplicated between CCA and EU ETS.	

22	Would you say that the administrative costs have changed over time including in reaction to the development of the climate policy in the UK? In relation to the EU ETS costs are the resources required for CCL/CCA similar/smaller or interrelated for your members?
The double burden of monitoring, reporting and verification for two schemes adds unnecessary cost and additional resources to companies; this could be better spent on emissions reduction. Although measures are taken to combine audits the different time frames involved with the two schemes make it difficult to save costs. Verifiers are very busy and it is becoming increasingly difficult to find alternative verifiers thus the lack of competition is maintaining high verification costs.	
23	From your understanding has operating under the CCL/CCA helped your members to prepare for operation under the EU ETS – are the two complementary at all? Or does this result in increased complexity of management because of differences between the schemes? Please use examples to illustrate this.
CCA has assisted the industry to learn about emissions trading in preparation for EU ETS but it has now served its purpose and the significant duplication between the two regimes should be removed by either removing the CCL for EU ETS installations or providing the CCL rebate to those installations.	
24	For those companies that do not have a CCA. Do you see benefit or any barriers to joining a CCA if this were possible?
The cement sector CCA contains all UK cement manufacturing companies	
25	In your opinion do you think that companies have different knowledge at different levels of the business? I.e. the requirements and need to manage energy use for CCA purposes is well/not well communicated. We realise that this will vary from company to company please provide a brief overview of the range of differences and if in your opinion this actually matters.
The cement sector is well aware of energy efficiency and the need to reduce carbon dioxide and these topics are some of the most important for each of the manufacturing companies. Company representatives at every level of the organisations are aware, to a greater or lesser degree, of energy efficiency. This is due in part, to the comprehensive coverage of environmental management systems within the sector. All BCA member companies have accreditation to ISO 14001 and many have EMAS registration.	

AREA 5: Sector Associations and Government

This area seeks to explore the views of companies regarding the role(s) of the Sector Associations and DEFRA in the CCL/CCA conception and operation

26	Do your members fully understand energy use and emissions for their sites and provide this information to you enabling you to negotiate with DEFRA?
Yes, In addition to the CCA data BCA collects a wide ranging selection of energy, carbon dioxide and other environmental data on an annual basis. This information is used to feed into for example, CEMBUREAU (the European Cement Industry Association), the Environment Agency cement sector plan and the national emission inventory. The cement sector also produces an annual sustainability report called 'Performance' which can be downloaded from www.cementindustry.co.uk	
27	What sort of information, expertise and advice do you offer to CCA members supporting their operation under the CCL/CCA? Have you supported them in the decision-making process related to efficiency improvements and emissions reductions?
The BCA has a climate change working group on which representatives from all CCA companies (all UK cement manufacturers) are represented. The group meets around 12 times per year to discuss energy efficiency and climate change policies as well as technical matters such as sector benchmarks	

28	Have you been able to negotiate effectively with DEFRA in establishing the levels of CCAs? Is their level of understanding of your sector sufficient?
Defra rely upon consultants to provide advice and technical assistance in the CCA calculations and negotiations. Quite often industrial sectors are dealing with different Defra consultants depending upon the climate change policy in question. This makes for an inefficient process; Defra fail to learn about the sector because the detail is dealt with by consultants and; there is a lack of continuity as consultants change between projects.	
29	How do you feel government has managed the costs of CCL/CCA for your members?
We do not believe that Government understands the true cost of CCL/CCA for the sector, and thus it cannot be managed.	
30	Do you consider that DEFRA takes account of the cost implications when negotiating agreements? Have DEFRA assisted in keeping costs to a minimum while also setting challenging but achievable targets?
Government listen to the sector when cost implications are presented but whether or not they truly understand the sector specific issues is questionable.	
31	When targets are renegotiated, how much / what kind of information do you share with Defra? How happy are you to share information with Defra? And does this accurately reflect the information that your members have provided to you?
In the 2004 target review the BCA shared confidential information with Defra that reflected exactly the positions of each cement manufacturer. The sector shared information on planned energy efficiency measures, plans for fuel replacements and impacts from other policy measures.	
32	How easy / prolonged have negotiations with Defra been, and why?
The negotiations for the cement sector are relatively simple because the sector target is built 'bottom up' from the target unit specific energy forecasts. The energy forecasts at the target unit level are dependent upon investment cycles which are generally essentially predictable. However, the forecasting of energy improvements due to the use of alternative fuels are subject to gaining approval of their use from the Environment Agency. The timeframes for approval can sometimes be very long due to public consultation, trial periods for use of the fuels etc. Forecasting in this area can lead to projected targets being dependent on approvals being given good time within the target periods.	

AREA 6: Other Opinions

This area is intended to provide the opportunity for you to discuss elements of the scheme you think work well and elements you do not think work well. In addition if you have any other observations or experiences in relation to the CCL/CCA please provide some comments here.

33	What elements of the CCL/CCA do you think work well?

The CCAs reward the sector for using more alternative and waste derived fuel. In doing so the cement sector is recovering the energy from materials that would otherwise be disposed in landfill (eg waste tyres) or by incineration (eg MBM) and that would emit GHG to atmosphere that are not regulated under CCA or EU ETS.	
34	What elements of the CCL/CCA do you think do not work well?
The key issue for CCA, since the advent of EU ETS, is the significant and unnecessary overlap in the two climate change policy measures. CCL needs to be removed on fuels covered by the EU ETS. This should take place at the earliest opportunity; a sensible time would be at the start of Phase II EU ETS in 2008. Otherwise Government would be advocating double regulation which is in conflict with its 'Better Regulation Agenda'. Further detail can be found in the BCA response to the Hampton Review.	
35	Are there any elements of the scheme that you would like to change? Please provide examples of how you think these could change and why you consider this to be better (remember that the objective of this scheme is to stimulate energy efficiency/emissions reductions)?
CCL needs to be removed on fuels covered by the EU ETS. This would mean that the cement sector CCA targets would relate to electrical energy only. As such targets would need to be renegotiated to take account of the additional electrical energy needed for such things as alternative fuel reception, storage, preparation and handling as well as the more complex arrangements for firing and combustion. This would allow the industry to further replace fossil fuels with alternatives whilst not being penalised by overly tough CCA targets.	
36	Do you think that there are any threats to the continued operation/effectiveness of the CCL/CCA in the future?
For those sectors that have emissions covered by EU ETS the CCL/CCA is becoming less effective, particularly as EU ETS target become more stringent in the future. However, the EU ETS is an effective driver for emissions reduction as it puts a price on carbon thus directly incentivising change; in doing so it effectively replaces the need for CCA	
37	What are the interactions with other policy instruments like? Are they easy to manage? Please provide specific examples where possible.
The key issue for CCA, since the advent of EU ETS, is the significant and unnecessary overlap in the two climate change policy measures. The two measures do not interact well rather they duplicate effort and resources. The added complexity of two measures regulating the same fuel use is illustrated by the 'double counting' arrangements described in Defra guidance note CCA23. These arrangements are extremely complex, inefficient and not easily managed. The other area of disconnect between the two Schemes is that all alternative fuels are discounted under the CCA (both bio mass and non bio mass based) but only bio mass is discounted under EU ETS. The resulting management of data leads to confusion between what is accounted for in the data produced in each Scheme. This is particularly true when energy/CO2 data is produced on an international basis within companies, only the UK has to explain these differences to its international owners sometimes much to their bemusement.	

Section B Statements

This section provides a series of statements and responses. The intention is for you to think about your experience of the CCL/CCA operations and to select the answer that most appropriately fits your dealings with the companies and DEFRA.

Please mark one appropriate statement and provide additional clarification of your response if you feel this is necessary.

Please indicate if your answers would differ depending on the different organisations within your sector. If possible please illustrate any discrepancies with examples.

Statement 1: Energy/emissions targets for organisations in our sector are realistic (*please tick one box*)

	No, they are set too high and not very realistic
	If I was being honest the organisations find these targets quite easy to achieve, although this is not generally known
	The organisation's targets are reasonably balanced/moderately challenging and result in minor changes where required
	Targets for our organisations are very credible and are used to inform investment decisions
✓	Targets are realistic and regular reports show that attention has driven down energy use and emissions across the whole organisations
	Organisations think that targets 'negotiated' with DEFRA are not too challenging, and the organisation can normally meet them

Please clarify your response above if necessary:

Statement 2: What do you think about the CCA/CCL package overall (*please tick one option*)

	Generally, I think it is a waste of time as far as our members are concerned
	Sometimes I don't think it really meets what it set out to achieve for our organisations
	I think it works quite well in helping our organisations to manage their emission levels
	The CCA scheme regularly influences the investment decisions our members make
✓	The help we provide together with the CCA scheme package has greatly helped to achieve lasting emissions reductions in their organisations
	I think most people see it as a way of reducing costs and if it doesn't then they don't really want to know

Please clarify your response above if necessary:

Statement 3: CCA targets are agreed with DEFRA (*please tick one box*)

	If I was being honest we have our members interests at heart and negotiate targets that they can easily meet
	Most of the time we know more about how easy or not it will be for our organisations to meet a target than DEFRA
	Normally targets are agreed that I know will challenge our organisations to change what they do
✓	The targets and CCL reductions/rebates are structured so that our members are rewarded for their best efforts, and not just for meeting the target
	I regularly see our organisations successfully reducing their overall emissions and the targets/reduction/rebates they have act as great motivators

Please clarify your response above if necessary:

Statement 4: Industry knowledge that affects our members is available to us and DEFRA (*please tick one box*)

	Often we have different information to DEFRA which can lead to confusion
	Industry information is collected and most of the time we all have the same data to work from
	I always agree with the rationale for a particular target based upon our common understanding of the sector
✓	We always have an open and honest discussion which is greatly helped by us all having the same understanding of the available information
	We always draw the same conclusions from the available data and can easily agree on what improvements need to be made and where
	It is not unusual for the required data to not be available

Please clarify your response above if necessary:

Statement 5: Does the size of the CCL reduction/rebate drive the right behaviour in our members (*please tick one box*)

	From what I see they have been successful in achieving genuine energy use and emission reductions from being part of the scheme
	The CCA/CCL scheme has prompted them to routinely measure the impact of their investment decisions on energy use and emission levels
✓	They take the CCA/CCL scheme very seriously and actively look for ways of reducing energy use and emissions
	Sometimes they may decide to do something but only if it easy or straightforward to do
	No, it seems to me they do not, in reality, pay much attention to the scheme
	I wouldn't know

Please clarify your response above if necessary:

Statement 6: CCA/CCL reporting can be administered by our members (*please tick one box*)

	I often find our members have a real difficulty in completing the reports accurately and easily
	From what I see our members sometimes have a problem in understanding what is really required and can get confused
✓	Our members generally have a system or method in place which normally works quite well, easily gathering and reporting the data required
	Our members have collected the same data easily over a number of years, with this usually proving the benefit to them of using the CCA/CCL scheme
	Not only can our members easily administer the CCA/CCL scheme but data shows that they have made lasting reductions in emissions cost effectively

Please clarify your response above if necessary:

Statement 7: Our members understand the CCA implications (*please tick one box*)

	Not really, they have the documents but I don't think they really understand what they mean to them
	Some people in the organisations understand the implications but I wouldn't say this is very wide spread
	Yes, I have seen evidence that they have reviewed the documents and have a consistent understanding of what it means for them
✓	I know that as part of their business planning activity they regularly calculate the impact of planned investment on their energy use and emission levels
	Their results show energy use and emissions reductions given their level of business activity and the investment decisions implemented

Please clarify your response above if necessary:

Statement 8: This organisation collects CCA/CCL information for DEFRA accurately (*please tick one box*)

	Our members are often late with CCA/CCL information needed and much of it is inaccurate or incomplete
	Sometimes the CCA/CCL information is not as accurate as it could or should be
✓	Normally CCA/CCL information is supplied on time and is quite accurate as well
	CCA/CCL information is always accurate and it can be seen that total emissions are being managed within the target set
	The CCA/CCL data shows that emissions are reducing over time and I believe this information to be a true reflection of what is really happening

Please clarify your response above if necessary:

It is intended for this to be returned electronically to crittens@rpsgroup.com. However, if you would like to send a hard copy please contact Simon Critten on 01273 546800 who can provide you the address.