



Leicester  
City Council

**WARDS AFFECTED: All**

**Overview and Scrutiny Management Board  
Cabinet**

**4<sup>th</sup> December 2008  
8<sup>th</sup> December 2008**

---

**ECO-MANAGEMENT AND AUDIT SCHEME (EMAS)  
Revised Environmental Policy,  
Review of progress towards targets 2007/08,  
Proposed Action for 2008/09**

---

**Report of the Corporate Director of Regeneration and Cultural Services**

**1 Purpose of Report**

1.1 This report recommends amendments to the corporate Environmental Policy to align with One Leicester, and provides Cabinet with information on the Council's annual environmental progress through the Eco-Management and Audit Scheme (EMAS). New targets are proposed for recycled paper and open space management. The report also includes the draft text of the EMAS public statement covering the financial year 2007/08, and the proposed actions to be included in the 2008/09 action programme (both documents available in the Members Area).

**2 Summary**

2.1 EMAS is being used to manage and improve the environmental performance of the Council, under the priorities of One Leicester. In particular the system will manage the commitment to reduce our carbon footprint and manage delivery of the carbon dioxide reduction targets for the council and city. An amended version of the Environmental Policy is recommended for approval, which aligns with One Leicester and the new priorities (Appendix 6).

2.2 EMAS will help manage the City Council's response to relevant National Indicators relating to air quality, biodiversity, waste, street cleanliness, litter, children travelling to school and climate change.

2.3 The City Council continues to take a national lead by including 50 schools within the scope of its EMAS registration, with 17 further schools to be presented for verification in November 2008. This is a partnership project with Groundwork Leicester & Leicestershire, which was successfully mainstreamed during 2006/07. The public statement contains a number of case studies of positive action from schools.

2.4 EMAS drives improvements in environmental performance, reduces the risk of breaching environmental legislation and demonstrates a level of

performance management that has been viewed favourably in several inspections and awards (e.g., Comprehensive Performance Assessment, Beacon Status for a Quality Environment). Appendix 5 provides a summary review of the management of EMAS during 2007/8 and the corrective action required from audits.

- 2.5 EMAS has 21 corporate environmental improvement objectives and 12 objectives for schools. Progress towards these objectives (and their associated targets) is given in full in Appendix 1. In summary, 17 targets were measured during 2007/08. Of these, 6 targets are successfully on track to be met (see paragraph 4.3 of the report). Paragraph 4.8 draws attention to concerns around the targets for building energy use, renewable energy, and travel to school. Of the remainder, progress is inconclusive, or not yet known.
- 2.6 During this reporting period we have focused attention on the reorganisation of targets under the priorities of One Leicester, particularly the two strategic programmes of “reducing our carbon footprint”, and “people not cars”. This is presented in Appendix 4. Members attention is drawn to proposed new targets for using recycled paper and managing the quality of public open space.
- 2.7 The monitoring exercise has informed the annual EMAS public statement (Appendix 2 in Members Area). The statement is a requirement of the EMAS regulation and will be made available on the internet. In addition, we will publish a summary version of headline issues, for wider distribution in libraries etc.
- 2.8 Elected members should note that the next EMAS Verification will take place for the corporate system on the 17th – 21<sup>st</sup> November, followed by verification of the schools, 24<sup>th</sup> – 28<sup>th</sup> November 2008.

### **3. Recommendations**

Overview and Scrutiny Management Board are recommended to:

1. Note progress towards the EMAS targets during 2007/08 (see appendix 1)
2. Note the adequacy of proposed action towards targets 2008/09 (see appendix 3, in the Members Area)
3. Note the management response to matters outstanding from audits (appendix 5)

Cabinet members are recommended to:

1. Agree the text for the amended Environmental Policy (appendix 6)
2. Note progress towards the EMAS targets during 2007/08 (see appendix 1)

3. Agree new targets and amendments to existing corporate targets (see appendix 4)
4. Agree the implementation of the proposed 2008/09 action programme (see appendix 3, Members Area)
5. Agree the draft text for the 11<sup>th</sup> EMAS Public Statement (see appendix 2, Members Area)
6. Agree the management review of EMAS (appendix 5)

#### **4. Report**

##### **Amendments to the Environmental Policy**

- 4.1 Elected members are asked to approve an updated and simplified version of the council's Environmental Policy (Appendix 6). The policy has been aligned to the vision and priorities of One Leicester. In particular, climate change is given prominence, reflecting the council's commitment to taking mitigating action and to preparing to adapt to climate change.

##### **Environmental Network**

- 4.2 A new staff Environmental Network will be launched in October, in support of the policy commitment to enable staff to play an active role in environmental improvement. A representative from each service will form the network which starts with the Big Switch-Off campaign in October. The Big Switch Off will draw attention to conserving energy, in response to poor performance against this target (paragraph 4.8). Further campaigns are planned for the remainder of the year on staff travel and paper reduction.

##### **Positive Progress towards existing targets**

- 4.3 Appendix 1 summarises progress towards all EMAS targets. Performance is on track to meet the following targets:
  - number of schools participating in EMAS (13.2)
  - reducing school construction waste (BSF) (6.3)
  - street cleanliness (12.1)
  - provision of accessible green space to the public (10.1),
  - reducing car trips to the city centre, (4.2)
  - application of the Planning Renewables Policy to major developments (11.1)
- 4.4 The number of schools participating in EMAS continues to rise, with 17 new schools joining the scheme during 2007/08. This is on track to meet the target of 90 schools by 2010/11. The scheme has received national recognition and Groundwork UK are considering adopting the Leicester approach throughout their trusts. Within the BSF programme, the continuous improvement plan target to "reduce construction waste to landfill", was on track at the end of the 07/08 financial year.

- 4.5 Street cleanliness and the provision of accessible public green space continue to be good news stories with overall levels of open space remaining well above the EMAS target and street cleanliness levels being well within the target of *“15% of relevant land and highways in the city centre has combined deposits of litter and detritus that fall below an acceptable level,”* at 6% in 2007/08.
- 4.6 Regarding the commitment to a sustainable built environment in the city, 84.3% of planning applications in 2007/08 applied policy BE16 relating to the generation of on-site renewable energy. This exceeds the target of 75% for that year (80% for 08/09) and is a good news story for the first full year of reporting against this target.
- 4.7 In 2007/08 there was a slight increase in car trips to the city centre (1.6% increase on 2006/07). However, the overall trend from previous years indicates that we are in line with the overall target which allows for a 3% increase by 2010/11, from the base year of 2004/05.

#### **Areas of concern**

##### **Council’s total building energy consumption**

- 4.8 During 2007/08 there was no change in the energy used from the previous year which represents a reduction of only 3.1% from the base year of 1990. To be on track to meet the target would require a reduction of 25% from the base year, and now presents a considerable challenge as we are half way through the target period.
- 4.9 A planned programme of surveying and investment for council buildings will help identify potential savings across the estate with the most energy intensive buildings being prioritised in successive phases. (Phase one is scheduled for Corporate Directors Board on Leisure Centres in November). Further phases will include CLABS buildings, libraries and care and residential homes. The intention is that investment recommendations will be brought to Corporate Directors Board so that a strategic approach to larger scale investment can be taken. Funding opportunities will be identified to deliver these improvements potentially including the LAEF scheme, capital budgets and prudential borrowing. The data collected can be used to benchmark each building against best practice.
- 4.10 The importance of behavioural change will be highlighted through the Environmental Network’s first campaign in October *“The Big Switch Off”*. This campaign will highlight 5 easy actions relevant to the majority of council work areas.
- 4.11 From December, a new Energy Project Officer will work with building managers and tenants to reduce energy use through behavioural change, technological innovation and signposting to funding opportunities. The project officer will help implement the findings of the *“Green review of LCC IT”* which should be completed by December 08.

### **Council's use of renewable energy in corporate buildings**

- 4.12 The revised Environmental Policy makes a clear commitment to “encourage the appropriate generation and use of renewable energy”, but the associated target continues to be an area of concern. In the previous report to cabinet (Nov 07) it stated that “A new energy contract will be in place from December 2007. The new contract will be for a period of between 12 months and 2 years and will seek the same or improved % of renewable energy as the pre-June 2006 contract with the remaining energy requirement from CHP.”
- 4.13 However, this intention was not realised. The new energy contract from ESPO only generates electricity from “Good Quality CHP”, which no longer contributes to the renewables target. This is due to the dramatic increased cost of true renewable energy as demand has increased.
- 4.14 Achieving the target will require a greater commitment to generating our own electricity from renewable resources. An inventory of the council's existing renewable energy installations (wind turbines, PV etc) on LCC buildings and land was carried out in 07/08. However, in many instances, installations were too small in scale to make the installation of monitoring equipment cost effective.
- 4.15 As part of the Energy Team's Survey and Implementation Programme the scope for on site renewables is being looked at for every building. The first report on leisure centres is due to go to Corporate Directors Board in November. This will be followed by reports on other establishments such as libraries.
- 4.16 The current proposal for Combined Heat and Power provision in the city does not currently allow for renewables but this will be considered in future. This scheme could reduce the Council's emissions in buildings by 15%.
- 4.17 Proposals for consultation on leasing City Council land for development of large-scale wind turbines in the city were taken to Cabinet Briefing on 23<sup>rd</sup> June 2008. Members felt that it was important that any consultation be based around a number of sites of proven viability, even if this meant the Council funding the technical investigation. As a result, it was decided that a technical investigation into viability of the sites should be undertaken and a further report (due to go to 27<sup>th</sup> October Briefing) will recommend that consultants are appointed to carry out a 2stage site investigation programme for the 5 potential sites. The stage 1 site investigation work could be completed by March 2009, but the more detailed stage 2 investigations may not be completed until July 2010. As part of the investigation consultants will be asked to outline options for how the electricity generated could be used in Leicester.

### **Travel to school**

- 4.18 Data for 2007/08 shows a move away from the target to reduce the proportion of journeys to school by car. Further resources are currently

being sought for school travel planning which should help re-address this concern, together with helping to meet the government target for school travel planning and the concerns of the EMAS Verifier (appendix 5).

### **Further Development of Targets and Monitoring Systems Reorganisation of objectives and proposed targets**

- 4.19 Appendix 4 proposes a reorganisation of objectives and targets together with amended wording. The rationale for the reorganisation has been to prioritise climate change (in line with One Leicester) and to broaden the wording of objectives to allow scope for more specific targets to develop. A good example of the approach is with the significant effect “The council’s use of Energy and Fuel”. The proposed objective against this issue is broadened in line with NI 185 to “reduce the council’s **total** energy consumption”. A number of specific targets to meet this objective will relate to buildings and travel (as before) but now include street lighting and traffic signals (new). Data collected for NI 185 will enable annual monitoring of our progress on reducing CO2.

### **Proposed New Targets Staff Travel**

- 4.20 Appendix 4 proposes a new target should be developed during 2009/10.

During the year, we would propose to run a campaign with the Environment Network to develop the principle of saving carbon through council travel and to collect baseline data to be able to propose a new target to Members in November 2009. In 2007/08 the council travelled 8.31 million miles on business.

### **Greater use of recycled paper (corporately and schools)**

- 4.21 New targets are proposed for the recycling content of different types of council paper. Attention is drawn to the proposed specific target for printed leaflets which states a minimum recycled paper content of 75%. It is intended to run a campaign on this topic through the Environmental Network in spring 2009, to raise awareness and drive action towards the new targets.

**Target 17.2 To meet the following standards for recycled paper use from 2009/10:**

- All publications, leaflets, flyers and posters to use at least 75% recycled paper.
- All site and volume photocopying to use 100% post consumer waste paper.
- All Council stationery to use 100% post consumer waste.
- All printing of web products (e.g. Link) to be 100% recycled paper.
- All basic digital colour low volume printing to be on 100% post consumer waste paper.

All EMAS schools will commit to a target to use recycled paper by 2012.

- 4.22 The implementation of a select list for printing council documents is providing new baseline data this financial year for setting a paper reduction target next year.

**Managing council-owned public open space and tree planting**

- 4.23 New targets are proposed to reflect the importance of providing high quality public open space. These will be based on the nationally recognised “Green Flag” methodology. The commitment to plant 10,000 trees by 2011 is formally proposed for adoption as an EMAS target. For schools, there is an amended target which recognises the importance of growing local food as well as managing grounds for wildlife.

**New Targets for open space and tree planting**

- Plant 10,000 trees by 2011.
  - Achieve a 2% increase in the overall quality of provision by 2010/11 from a baseline average of 50% in 2008/09, as measured against the Green Flag Award Criteria.
  - Increase park user satisfaction levels from 74% (2005) to 79% (2013).
  - 90% of EMAS schools to have a wildlife or food growing area by April 2012.
- 4.24 Data collection for a number of targets will be improved in line with the new set of National Indicators. For example Defra will provide annual CO2 data for the city under indicator NI 186. (Previously De Montford University were commissioned to provide occasional modelling data.). Schools energy and water use will now be monitored as part of reporting on indicator NI 185, and this energy spreadsheet will link to calculations of fleet vehicle emissions (NI 194).

**Targets remaining without data**

- 4.25 Of particular concern is the target relating to **council office waste**. A system is yet to be developed to measure the amount of waste collected from council buildings. This is important to measure the effectiveness of recycling schemes such as the office waste paper recycling scheme due to be rolled out to all council buildings in the next few years

- 4.26 In addition, a number of the school targets adopted in November 2006, remain without adequate systems for aggregating and reporting data. The measurement of the **collection of waste for recycling from schools** is a particular case in point.

**Management review of EMAS and progress with the issues raised in the EMAS Cabinet Report, November 2007**

- 4.27 Appendix 5 provides an overview of the EMAS management system in accordance with the EMAS regulation. It provides an update of the key changes to legislation affecting the system and draws attention to the major outstanding non conformity issues, from internal and external audits. The following 4 issues are identified:

- Contractor competencies
- School travel plans
- Air Quality
- Biodiversity

**Proposed EMAS Action Programme for 2009/10**

- 4.28 Appendix 3 (draft) reports on progress towards actions in the EMAS programme and recommends their continued inclusion in the 2009/10 action programme. In addition new actions have been suggested where appropriate.

**The text for the eleventh EMAS Environmental Statement**

- 4.29 EMAS requires us to keep the public informed of the City Council's environmental progress. We do this by publishing an annual EMAS public statement. The text is checked for its accuracy by the external EMAS Verifier before being made available to the public.
- 4.30 The proposed draft text for the annual statement is attached in appendix 2. The statement reports progress towards the EMAS targets during 2007/08 The statement also provides a commentary on the key issues influencing our progress and presents some of the important future actions.
- 4.31 Following from last year, the EMAS schools continue to have a significant profile in the 11th Statement and this will increase further in subsequent years as the school EMAS targets become more actively monitored.
- 4.32 The full statement will be viewed only on the internet, with the option of obtaining a printed version from the Environment Team. This is in response to a desire to minimise paper consumption and also a reflection of the increased length of the statement now that schools information is included. However, as last year, a summary leaflet will be printed which contains extracted "validated" information of most interest to the general public. This leaflet can then be distributed widely in public libraries etc.

**Next Steps**

- 4.33 The next steps are as follows:



1. The proposed action programme will be implemented from November 2008.
2. External re-verification of EMAS will take place during November 2008, including the validation of the public statement.
3. The eleventh EMAS public statement will be published following validation.
4. Members will receive the next annual report on progress towards the targets in November 2009.

## **5. FINANCIAL, LEGAL AND OTHER IMPLICATIONS**

### **5.1. Financial Implications**

- 5.1.1 EMAS is managed by the staff in the Environment Team and is financed through the Team's budget. The team's expenditure budget for 2008/9 is £301.1K. This covers the verification costs and all associated printing of documents required for the process, including publication of the annual public statement. The implementation of the proposed 2008/09 action programme will be met from resources that are already committed (e.g., through the Local Transport Plan).

*Author Paresh Radia—Finance, R&C (ext. 297390)*

### **5.2 Legal Implications**

- 5.2.1 The corporate environmental policy commits the organisation to "fulfil our statutory environmental responsibilities". A prosecution for breaching the relevant legislation would result in automatic removal from the EMAS register. The Council does take effective measures to ensure that its contractors comply with the EMAS obligations by ensuring it is an evaluation criteria in the procurement process and including clauses requiring compliance within all standard and bespoke contract terms.

*Author Rebecca Jenkyn – Senior Solicitor, RAD (ext. 296378)*

## **6. Other Implications**

<b>OTHER IMPLICATIONS</b>	<b>YES/NO</b>	<b>PARAGRAPH REFERENCES WITHIN THE REPORT</b>
Equal Opportunities	No	
Policy	Yes	EMAS is the management system we use to implement the corporate environmental policy
Sustainable and Environmental	Yes	EMAS is the management system we use to implement the corporate environmental policy
Crime and Disorder	No	

Human Rights Act	No	
Older People on Low Income	No	

## 7. Risk Assessment Matrix

Risk	Likelihood L/M/H	Severity Impact L/M/H	Control Actions (if necessary/or appropriate)
<p><b>1 – Failure to take corrective action necessary to meet our EMAS targets</b></p> <p>Meeting the EMAS targets is not a requirement of the EMAS regulation, but progress needs to be reviewed regularly and corrective action taken as necessary to improve performance.</p>	L	L	Progress is reviewed annually by members at Cabinet and corrective action agreed through the review of the EMAS Action Plan. The process of closing out non-compliances raised by internal EMAS audits provides another mechanism for taking corrective action.
<p><b>2 – Failure to maintain an EMAS Action programme</b></p> <p>The EMAS action programme is a requirement of the EMAS regulation. Without this EMAS registration could not continue.</p>	L	H	Env Team have work instructions in place to review the action programme every 6 months and to report annually to members.
<p><b>3 – Failure to produce a verifiable public statement</b></p> <p>The EMAS public statement is a requirement of the EMAS regulation. Without this EMAS registration could not continue.</p>	L	L	The text of the Public Statement is presented to members at Cabinet for agreement and subjected to checking by internal audit prior to verification taking place.

L - Low  
M - Medium  
H - High

L - Low  
M - Medium  
H - High

## 8. Background Papers – Local Government Act 1972

- LRQA EMAS Verification reports November 2007, , May 2008
- EMAS Progress for 2006/7, proposed action for 2008/9. Cabinet, November 2007.

## 9. Consultations Consultee

Individual officers named in the action programme (appendix 2)

**Date Consulted**  
September 2008

**10. Report Author**

Carol Brass/Anna Dodd  
Team Leaders Environment Team  
Ext. 29 6732  
Email [carol.brass@leicester.gov.uk](mailto:carol.brass@leicester.gov.uk)  
[anna.dodd@leicester.gov.uk](mailto:anna.dodd@leicester.gov.uk)

**Appendices**

Appendix 1 – Progress Towards EMAS Targets 2007/08  
Appendix 2 – Environmental Statement April 2007–March 2008 (available in the Members Library)  
Appendix 3 – Updated EMAS Action Programme 2009/10 (available in the Members Library)  
Appendix 4 – Proposed Amendments to EMAS Targets 2008/09  
Appendix 5 – Management Review 2007/08  
Appendix 6 – Amended Environmental Policy

<b>Key Decision</b>	No
<b>Reason</b>	N/A
<b>Appeared in Forward Plan</b>	N/A
<b>Executive or Council Decision</b>	Executive (Cabinet)