



Department for
Business, Energy
& Industrial Strategy

Towards a market for low emissions industrial products

Call for Evidence summary of responses -
Executive summary

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In general, respondents were supportive of the introduction of any demand-side policies, suggesting that government should take action as soon as it is practical, paying attention to the schemes and initiatives already in operation.

Defining ‘low emissions’

On the emissions to include in a definition of a low emissions product, the majority of respondents agreed that at least some Scope 3 emissions (emissions as a consequence of an organisation’s actions that occur at sources not owned or controlled by the organisation), should be included (Scope definitions can be found in Annex 1). However, some respondents recognised the difficulty of collecting data on Scope 3 emissions, in particular for small or medium-sized enterprises (SMEs).

On the stringency of an initial definition, there was a broad consensus among respondents that the definition should be set at a level which is achievable with current technologies, such as resource and energy efficiency measures.

Most respondents agreed that sector-level definitions would be the most appropriate level of granularity, as opposed to product-level definitions. Respondents from some sectors noted that definitions should consider the functionality of a product, rather than just its product category or sector.

On existing definitions, respondents mentioned schemes including Responsible Steel, SteelZero and ConcreteZero. However, there was a lack of consensus within sectors on whether existing definitions should be endorsed by government.

Sectoral and product scope

On existing demand for low emissions products, respondents in the construction sector pointed to growing interest from designers, contractors and buyers. However, most respondents emphasised that cost remains the dominant factor when choosing a product.

On policy potential, many respondents agreed that clarity on green credentials would improve buyers’ confidence in differentiating products. However, respondents emphasised that policies to make the technology switch commercially viable are also needed.

On sectors to target, respondents from the construction sector mostly said that reporting schemes have been developed already. Respondents also highlighted that future policies should build on these current frameworks. In other sectors, the decarbonisation and associated reporting was reported to be less advanced, especially where technological advances were needed first.

On treatment of imported products, respondents generally supported treating imports the same as domestic products when it comes to reporting requirements. This is although it might be harder to certify the emissions of products manufactured outside the UK. Respondents noted that not including imports could increase the risk of carbon leakage. Additional suggestions included a 'carbon custom union' to allow the trade of low carbon goods between participating countries.

Emissions reporting and verification

Respondents highlighted multiple private sector emissions reporting schemes that could provide data for demand-side policies. Of the schemes, none are universally adopted by industry, but some are popular in specific sectors, such as Environmental Product Declarations (EPDs) used for construction products.

On the granularity of reporting, many respondents noted that benefits of reporting must outweigh administrative costs. Respondents suggested introducing various incentives for businesses to opt for more detailed reporting, such as having less frequent reporting obligations.

On the practicality of reporting, respondents' views varied on how often data should be reported, with suggested frequencies of 1, 2 or 5 years, or to match the reporting cycles for the UK Emissions Trading Scheme, Streamlined Energy and Carbon Reporting and EPDs.

On verifying data, most respondents noted that verification should be underpinned by methodologies approved by the International Organization for Standardization (ISO). Respondents mentioned many existing organisations that can check emissions data.

On existing private sector schemes, respondents mentioned EPDs, Science Based Targets Initiative and sector schemes such as ResponsibleSteel and the Low Carbon Concrete Routemap. On existing government schemes, most respondents agreed that they do not collect the data needed for demand-side policies, for example, product data.

Policy implementation: instrument

Respondents had a variety of views on the role of voluntary measures. Many respondents said that voluntary measures would not change behaviour by buyers and manufacturers because their decisions would remain driven by costs. However, others thought that voluntary measures could galvanise the existing interest in green products and act as a stepping-stone to more stringent measures.

Many respondents mentioned that the public sector could act as a catalyst through its buying power in public projects (green procurement policy).

Policy implementation: timing

Respondents had a variety of views on whether their sector would be a suitable target for new demand-side policy over the next 5-10 years. Most respondents recommended that some

demand-side policy is introduced in the early 2020s or as soon as practically possible. Whilst most respondents think their sector is a suitable target for demand-side policy, some respondents believe implementation needs to prioritise sectors with higher emissions, and some responses suggested implementing policies incrementally.

Policy implementation: communication

Most respondents noted that any demand-side policies would need to be simple to interpret and implement and introduced with sufficient notice. They also stated that any labelling needs to be backed up with quantitative, verified data that is updated over time, to ensure credibility.

A few respondents referenced Environmental Product Declaration (EPD) certificates as a best practice. Most respondents thought that any label expressing embodied emissions should only contain a single metric (e.g. 6kg CO₂/t) accompanied by an indicative RAG or A-E type rating to make it easier for buyers to understand.