



[www.stopstanstedexpansion.com](http://www.stopstanstedexpansion.com)  
[info@stopstanstedexpansion.com](mailto:info@stopstanstedexpansion.com)

PO Box 311  
Takeley  
Bishops Stortford  
Herts CM22 6PY  
Tel: 01279 870558  
Fax: 01279 870786

20 May 2009  
by post and email

Carbon Neutrality and Carbon Offsetting Team  
Department of Energy and Climate Change  
3-8 Whitehall Place  
London SW1A 2HH

Dear Sirs

**Consultation on the term 'carbon neutral': its definition and recommendations for good practice**

Stop Stansted Expansion ('SSE') welcomes the opportunity to respond to the above consultation. SSE represents 7,500 members and registered supporters including some 150 parish and town councils, residents' groups, national and local environmental groups and other organizations.

You will see below that we are not responding to all of the questions raised in your consultation. A nil response should be taken to mean that either we do not have a strong view or we do not have the necessary expertise to offer a valuable response.

**Q1: Is it appropriate for Government to produce a definition of the term carbon neutral and recommendations on using the term?**

Yes.

**Q2: Do you agree with the Government's broad approach? If not, what alternative would you propose?**

Yes, but it is vital that the process is transparent.

**Q3: Do you agree that basing the measurement of emissions, including recommendations on good practice, on the GHG Protocol is appropriate? If not, what alternative(s) would you propose?**

Yes, but see our comments on Q6.

**Q4: Do you agree that users of the term carbon neutral should retain flexibility over exactly which emissions to measure? Should organisations be able to pursue carbon neutrality only for certain parts of the organisation?**

Yes, organisations should be able to pursue carbon neutrality for only certain parts of the organisation, but again this needs to be clear and transparent. For example it should not be possible for an airport to claim to be carbon neutral if it excludes the greenhouse gas emissions from aircraft using the airport.

**Q6: Do you believe that users of the term should be able to choose whether to measure all Kyoto greenhouse gases (in CO<sub>2</sub>e) or only emissions of CO<sub>2</sub>? Or should the definition specify measurement of all Kyoto gases?**

The definition should specify the measurement of all Kyoto gases. The appropriate measure should be carbon dioxide equivalent (CO<sub>2</sub>e) and should include the radiative forcing effect.

*Patron: Terry Waite CBE*

*Stop Stansted Expansion is a working group of the North West Essex and East Herts Preservation Association*

**Q8: Do you agree that PAS 2050 (or the full life cycle of the product using ISO 14044) should be used as the basis for calculating the carbon footprint of products for carbon neutrality purposes?**

Yes.

**Q9: Do you agree that emissions reductions form a necessary part of the definition?**

Yes.

**Q14: Do you agree that carbon offsetting is a fundamental element of achieving carbon neutral status?**

Our view is that offsetting should either not be considered as an element in achieving carbon neutral status or, if allowed, should be restricted to a maximum percentage (e.g. 20%).

**Q15: Given that the Government currently only feels able to vouch for the quality of Kyoto-compliant credits under the Quality Assurance Scheme, should the definition only include the use of such credits? Or would you propose other types of restrictions on the types of credits allowed?**

Only Kyoto-compliant credits should be considered.

**Q20: Do you believe the Government should regulate the use of the term carbon neutral? If so, why and how? How could regulation be enforced?**

Yes, we believe that the use of the term should be regulated because, otherwise, there is the risk of abuse whereby the term would quickly become discredited. We expect that a statutory regulation would be necessary, defining the criteria to be met before the term 'carbon neutral' could be used.

We hope you find our comments helpful.

Yours faithfully

Mike Young  
Climate Change Advisor