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**Response to the Welsh Assembly Government's
'One Wales: One Planet, Consultation on a new
Sustainable
Development Scheme for Wales'**

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Llywodraeth Cynulliad Cymru
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The Ecodesign Centre (EDC) is an applied research organisation that aims to build capacity and capabilities to enable effective ecodesign. The setting-up of EDC was supported by the Welsh Assembly Government as part of its statutory commitment to sustainable development. EDC staff are employees of the University of Wales Institute, Cardiff (UWIC) who manage and administer the funding.

EDC recognise the challenge of trying to prepare a strategy document that is so far reaching. We appreciate the dilemma of trying to exert levels of control and offer appropriate support across many policy areas. But this is such a critical time, and also a huge opportunity, EDC hope that the following comments will add value to this consultation process.

Overall comments

- The format of the report is unfortunately confusing. The Scheme needs to be clearer about how it intends to influence policy, what it intends to specifically support and what support it will require. It needs to work harder at revealing the actions in the body text that arguably are more important than some of the ones identified in the highlighted boxes.
- It is a framework strategy document that only puts forward principles for Sustainable Development and does not adequately discuss how to align these principles with other policy areas.
- It would be good to see a common vision before the final Scheme is published. Whether it be horizontal – across departments (each minister signs) or vertical – assembly, wag, regional authorities, local authority, intermediary orgs, social partners.
- There is a need for a clear view on the overall governance of the Scheme and more emphasis on implementation measures.
- The support required from the Welsh community has been predominantly left to the Annex. If this document is really about trying to promote a joined up commitment the support or role that society and communities will have, should be embedded within the document. EDC believe that policy development needs to be more design led thereby facilitating greater coherence and greater user engagement. New ways to design and develop strategy and policy could be tested by the WAG.



- Even though the category 'consumer items' was the fourth highest ecological factor for Wales' ecological footprint there is a lack of actions related to sustainable consumption. From EDC's perspective we would like to see a bigger emphasis on Sustainable Consumption and Production and linkages to the EU Sustainable Consumption and Production action plan and design – possibly a Welsh SCP action plan.
- EDC believe that the objective of capacity building is fundamental to all fields. This significance needs to be reflected within the strategy.
- 'Business as usual' has crept into certain actions and a more 'radical' approach is required.
- This Scheme does not explore rewards and incentives such as rate rebates, council tax reviews for community clusters. Is this something that the WAG is considering?
- EDC are concerned with the evaluation infrastructure. There needs to be a greater focus upon internal policy learning, responsiveness and the sharing of findings. Monitoring and evaluation needs to be aligned and a feedback mechanism created in order to act upon the results.

Q1. Is the overall purpose of the scheme, and how you should use it, clear - and if not what else should it say to reflect your input into working towards a sustainable Wales?

The aim to "provide a unifying vision and set of operational principles that will thread through, support and drive all our policies and programmes in a joined up way to deliver sustainable development." (P8) is excellent and to be commended.

EDC also support the fact that economic 'growth' is not an objective of this Scheme and the focus is about creating stability and greater resource efficiency (steady state economy).

The Scheme however does not successfully explain how it actually will be used and how it will be governed.

Q2. Is the new Vision helpful to you as a long term view of a sustainable Wales that you can aim towards?



Broadly speaking EDC support the principles listed in the document. The bullet points within the Vision provide guidance upon what the WAG feel should be a priority but it is not inspirational and does not suggest that Wales is attempting to lead this agenda.

In order to reach the statement “we will reduce our CO2 emissions by 3% a year, year-on-year, from 2011 in those areas where we have devolved competence, and move towards a zero-waste society.” a far more innovative and radical approach will be critical. The Institute of Public Policy Research (IPPR), WWF and the Royal Society for the Protection of Birds (RSPB) in their study “80% Challenge: Delivering a low carbon UK” (October 2007, http://assets.wwf.org.uk/downloads/80percent_report.pdf) state that in order to achieve an 80% reduction in CO2 emissions:

- A much more aggressive focus on energy efficiency should be pursued across all sectors.
- An ambitious implementation programme for renewable energy must be pursued.
- Government should review current policy planning tools and the current framework for energy regulation to ensure that the benefits of decentralised power generation are recognised and achieved.

The outcomes and reworked actions could provide the necessary detail to further enhance the vision and for this reason EDC believe this area should be the higher priority.

It is important for the WAG to work collectively in areas where the WAG has no devolved responsibility in order to innovate and collectively facilitate change.

Q3. Are the key outcomes sufficiently clear and comprehensive to help you align your activities as you plan and deliver your actions in support of a sustainable Wales?

The outcomes do provide additional detail but this is a very WAG centred report – it does not really indicate how business, education and the Welsh community can work towards this aim. As discussed within the general comments section earlier in this document, if the Scheme is really aiming to encourage alignment with a wider audience a far more inclusive approach is essential. EDC hope that this consultation process will begin to highlight these areas.

Q4. Are the specific actions and commitments helpful to you in demonstrating our commitment to SD and the route we will take?



The actions and commitments are not accessible and need to be revisited, please see general comments for more detail. EDC recommend that the Scheme has omitted the following specific actions:

- The WAG to undertake policy learning and act upon any adverse trends identified.
- Address consumption patterns and behaviour change
- Understand what effective sustainable international fair-trade should look like
- Build capacity and capabilities
- An explicit commitment to work with the third sector
- Promote sustainable innovation and social / eco entrepreneurs
- Encourage small scale mobilisation and regional responses.

Specific areas relating to EDC

Ecodesign is essential for meeting Wales's environmental challenges of the future – including moving to a low carbon economy by reducing waste, encouraging innovation and promoting sustainable consumption. We also believe that ecodesign can play a bridging role helping to facilitate intended policy outcomes. The following section will now discuss the Scheme actions related or relevant to ecodesign.

Action 1

To promote a low footprint Wales, WAG will further extend the use of ecological footprinting by introducing a grant scheme from 2009/10.

The grant provision to collate more ecological foot printing data is a valuable way for Wales to better understand its impacts. This will need to happen on a regional level but a greater understanding of life cycle impacts has to happen on also a business level. By underpinning all policy interventions with life cycle thinking ecodesign will be actively encouraged. There is a need to build an evidence base around priority products, sectors and materials using both existing data sets and through commissioning new studies to aid benchmarking. Finding ways to use this learning to promote life cycle thinking and implement life cycle costing will be critical.

Action 4

WAG recently measured the Ecological Footprint of each of the Wales Spatial Plan areas, and WAG will use this information to develop a strategy to reduce each Area's ecological footprint across the range of its activities, and set this out in the Area's delivery framework. As part of this, WAG will define the concept of low-carbon regions and how this can be achieved in each Spatial Plan Area.



Networks and clusters could be created to complement the spatial plan areas and ecodesign knowledge exchange could be included as a focus area. Facilitated knowledge exchange opportunities could be created and specific pilot projects could be supported and mentored. The clusters could explore procurement, supply chains, use of consortiums as well as new business and trading models.

Action 7

In its regeneration work WAG will encourage its partners to adopt similar principles to its own, integrating social, economic and environmental considerations, and seeking to maximize the benefits to the local community and economy from the way regeneration takes place.

Sustainability fatigue and economic tension are important considerations. For this reason stakeholder engagement becomes even more critical. Who are the partners that WAG intend to work with and are these still the right ones?

In order to achieve this action building capacity and capabilities around resource efficiency leadership, management and the development of innovative new business models will be absolutely key. Work will be required to not only communicate ecodesign principles but also work to understanding what this could mean for individual organizations.

The strategic use of design in non-traditional design environments such as public sector and policy development has been successfully demonstrated.

Southwark Circle, in a unique public-private partnership with Southwark Council, Sky Participle and the Department for Work & Pensions collectively designed new services to improve the quality of life and well-being of older people. 'Clinic To Go', working with staff from Birmingham North and East NHS Primary Care Trust (PCT) with an organization called 'thinkpublic' developed a new method for increasing localised health care. Green Homes Concierge is a pioneering service, developed over two years by Ten Lifestyle Management Ltd and the London Development Agency to look at home energy use, exploring sources of home energy use and developing new systems of home energy management.

All of these projects aim to co-create solutions by understanding relationships as well as the individual components. Design methodology such as transformation design could be used successfully by the WAG and its partners to help to look at regeneration issues holistically.



Action 8

WAG will work with the Regional Transport Consortia to increase the number of Sustainable Travel Towns throughout Wales

Again, up front design thinking could bring significant value to this process. Systems thinking and consideration to service design will provide a robust solution. EDC recommend that the WAG work with design experts to help facilitate this action.

A Prosperous Society: Structural funds

Comment on structural funds (p24) will require the WAG to work hard to realign the criteria set by WEFO. The economic indicator is currently the key factor with all WEFO bids. This is actually even more of a focus than in previous years when 'safe guarding of jobs' was acceptable. The economic pillar should not be driven through at the expense of environmental and social pillars.

Action 10

WAG will intensify its support for Education for Sustainable Development and Global Citizenship initiatives across all learning sectors, focusing on enabling greater access for learners; the establishment of support networks within each sector; production of best practice, training and resources; and, the development of the social justice aspects of ESDGC.

EDC also believe that education and capacity building is critical. Students and educators can initially feel uncomfortable when dealing with aspects of sustainability that require them to cross normal discipline boundaries. Design can play a bridging role by allowing departments and schools to work together to explore these strategic challenges.

Ecoliteracy is critical on all levels this includes policy makers, civil servants, professionals as well as students. All organisations will need to be assisted to ensure that they can confidently meet expectations and reflect Wales' sustainable development aspirations. This will involve innovative communication, new information and evaluation techniques to inform decision making. As is often the case with ecodesign, the initial project's expectations and intentions reflect a need to tackle more challenging and strategic issues. Because of this there is a need to strike a balance between both individual and organisational learning. The Scheme needs to support this type of organisational understanding.



EDC would like to see the 'knowledge' in Wales increasing and propose establishing sector-based sustainability learning hubs to intensify local ecoliteracy.

Action 12

Communities First will be reconfigured to ensure it will be more focused on sustainable outcomes for local people and communities whilst tackling economic inactivity, child poverty and promoting income maximization.

There is a need to enable the exploration and development of unmet needs and niche markets. This will require innovation and social and eco – entrepreneurial thinking. Small scale ventures need to be mobilized creating projects that can make a significant local impact and help to inform and influence the whole region. As has been proven no one size solution fits all and a localised response can make a significant impact as well as being transferable.

To promote eco and social innovation there is a need for the WAG to explore informal support channels including new ideas around risk capital and new commercialisation models Eco and social entrepreneurs need to be given the tools to evolve and support will need to be dynamic and responsive.

Action 16

WAG will ensure that every community in Wales is encouraged to join the Gold Star Community scheme to link with a community in sub-Saharan Africa, and will support them in helping to deliver the UN Millennium Development Goals to halve global poverty by 2015 whilst building community cohesion at home.

EDC strongly agree with the need for Wales to recognise what its actions can mean globally. The supply chain that feeds Welsh manufacturing and the Welsh service economy is complex. Wales needs to ensure that any promotion of greater self reliance minimises detrimental knock-on effects. Future international trade must benefit the areas that need it most and promote fair-trade. The designers of services and products as well as the consumers need to be made more aware of these relationships.

Q5. Are the suite of SD indicators comprehensive to act as clear drivers and provide sufficient clarity about the direction of travel to help measure progress to SD, and do they help you align the way you measure your organisation's contribution and progress towards SD?

The UK Government Sustainable Development Strategy has a suite of 68 national sustainable development indicators. The UN has 96 revised



indicators, including a subset of 50 core indicators. EDC strongly believe that there is real value in using the same indicators where appropriate to contribute to global knowledge and greater coherence.

EDC have some specific comments related to the five headline indicators proposed by the WAG:

Economic output - Gross Value Added (GVA) and GVA per head: GVA will provide average data for the country. There is a risk that this will not reflect local activity for example if there is greater self-reliance within a certain local economy the spend that is going back into that economy or the additional waste disposal costs will not be acknowledged (proximity principle). Figurers exploring consumption and production and value adding could potentially be more informative and help demonstrate decoupling.

Social justice - percentage of the population in low-income households: EDC appreciate that social justice is incredibly complex. The title would imply looking at gender, race, disability, age and religious inequalities. Maybe the indicator could include access to 'appropriate' work and associated figures such as numbers returning to work, overcoming transport poverty, access to local childcare. This indicator is actually more of an indication of Wealth.

Education and Capacity Building

Education has been omitted from these indicators. Levels of eco and social literacy have to be considered due to the critical impact this has on effective decision making.

Health and wellbeing

The fifth indicator based upon Health and Wellbeing is critically important in order to record quality of life and independent living. EDC support the WAG commitment to understand what this means in a Welsh context.

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