

# Carbon Emissions Reduction – Mid and West Wales Fire and Rescue Authority

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# Summary report

## Summary

### What we reviewed and why

- 1 Human behaviour is a major contributing factor to the long-term shift in average weather patterns. Widely recognised as humanity’s biggest challenge, addressing climate change requires individuals, communities, organisations, regions and countries to all play their part. The Paris Agreement, a legally binding treaty on climate change, was adopted in 2015 by 196 parties (including the UK) and reflects international commitment to achieve the economic and social transformation required to reduce greenhouse gas emissions<sup>1</sup>.
- 2 In Wales, our legislative framework to reduce greenhouse gas emissions was strengthened through the Environment (Wales) Act 2016. The Act sets a legal target of reducing emissions by 95% by 2050 and sets out a system of five-yearly carbon budgets and interim objectives to progress towards this<sup>2</sup>. As part of this, the Welsh Government has committed to achieving a carbon neutral public sector by 2030, and its climate emergency declaration in 2019 reaffirmed its ambition of increasing the pace of change towards a low carbon economy.
- 3 There is a cost to reducing carbon emissions, but this must be balanced with the much higher cost of doing nothing. The Well-being of Future Generations (Wales) Act 2015 is therefore key to how Welsh public bodies are addressing these challenges. By implementing the sustainable development principle and contributing to the national wellbeing goal of a Globally Responsible Wales, Mid and West Wales Fire and Rescue Authority (the Authority) can demonstrate its contribution to addressing the climate emergency.

### What we found

- 4 We undertook the review during the period November 2021 to January 2022. Our review sought to answer the question: ‘Is the Authority making good progress in reducing its carbon emissions and fully contributing to Wales’s public sector becoming carbon neutral by 2030?’ Overall we found that: **The Authority has a strong vision and is making good progress to becoming carbon neutral, but needs to address some major challenges to meet the 2030 carbon neutral target.**
- 5 We reached this conclusion because:
  - the Authority does not have a complete and up to date carbon baseline;

<sup>1</sup> [The Paris Agreement, United Nations Climate Change](#)

<sup>2</sup> [Wales’ commitment to tackling climate change, Welsh Government](#)

- the Authority is planning to reduce its carbon emissions but needs to place more emphasis on specific carbon reduction actions to deliver its ambitious vision;
- the Authority has a clear vision to become carbon neutral and is making good progress reducing emissions in some areas, but needs to address some big fleet and estates challenges; and
- because of data limitations and gaps in performance reporting, evaluating progress to become carbon neutral is not yet possible.

## Recommendations

6 The table below sets out the recommendations that we have identified following this review.

### Exhibit 1: recommendations

Recommendations	
R1	<p>Improve the quality of the carbon baseline by:</p> <ul style="list-style-type: none"> <li>• ensuring gaps in information in respect of water metering, the impact of carbon offset work and data on buildings are captured;</li> <li>• ensure the impact of the pandemic and the switch to more home and agile working are reflected in the carbon baseline; and</li> <li>• ensuring all 'Scope 3' emissions are recorded and added to the carbon baseline.</li> </ul>
R2	<p>Review environmental plans to ensure they fully capture decarbonisation priorities by:</p> <ul style="list-style-type: none"> <li>• ensuring aims in the Sustainability and Environmental Strategy are SMART and are focussed on the key risks and challenges facing the Authority; and</li> <li>• setting out the approach to sustainable land use for carbon offsetting required in the medium term, until a viable net zero alternative is found for its heavy Diesel fleet.</li> </ul>

## Recommendations

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- R3 Revise the vehicle replacement policy and the estates strategy and agree the Authority's strategy for replacing diesel appliances and improving the charging infrastructure across the Authority's area. As part of this process the Authority should:
- revise the Vehicle Replacement Programme policy and agree the Authority's strategy for replacing diesel appliances and improving the charging infrastructure across the Authority's area;
  - review the notional lifespan of electric and hybrid vehicles to better inform future planning assumptions;
  - review current capital spending on fleet replacement, electric charging infrastructure and adaptations to improve energy efficiency of buildings to ensure the Authority has sufficient funding set aside to support the transition to a low carbon service; and
  - identify opportunities and introduce reciprocal agreements to access and make best use of electric charging points and other buildings owned by the public sector across the Mid and West Wales area.
- 
- R4 Engage and involve staff in planning for carbon emissions reduction to ensure they take ownership of the Authority's plans for improvement and are fully contributing to delivery of key actions.
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- R5 Strengthen how progress in delivering actions to reduce carbon emissions and delivery against Welsh Government targets is progressing and resulting in improvement by:
- regularly reviewing performance against planned actions and the carbon baseline;
  - comparing performance with others to benchmark and identify opportunities to support improvement; and reporting on the baseline; and
  - revising targets for carbon emissions reduction to align with Welsh Government goals.

# Detailed report

The Authority's strong vision is driving a carbon reduction focus throughout the service, but there are still fundamental challenges to be addressed to meet the 2030 carbon neutral target

## The Authority does not have a complete and up-to-date carbon baseline

- 7 A carbon baseline is an inventory of sources of carbon emissions from business activities. This is typically a one (or more) year's snapshot that serves as a reference point for organisations to understand and track their changing emissions over time. In order to plan and budget for reducing carbon emissions and becoming carbon neutral, public bodies need to confidently understand the extent of their emissions by developing and keeping up to date a carbon baseline. This will then be used as a foundation for a carbon roadmap which can show the pathways that are available to practically meet Welsh Government targets.
- 8 The Authority has some key information related to activity relating to emission of carbon dioxide (CO<sub>2</sub>) and other greenhouse gases (measured in carbon dioxide equivalents or CO<sub>2</sub>e). For instance, the Authority reported in 2020-21 that its fleet produced 951 tonnes CO<sub>2</sub>e; and energy consumption contributed 642 tonnes CO<sub>2</sub>e. In addition, the Authority generated 20,419 kWh in renewable energy from solar PV panels attached to stations, an increase of 47% on the previous year. This is a good starting point for the Authority to build on, but there are some areas for improvement.
- 9 The Authority uses annual UK Government conversion factors<sup>3</sup> to calculate carbon emissions from activity data like miles travelled, or tonnes of gas used to heat buildings, in line with Welsh Government expectations. While the Authority currently records Scope 1 and 2 emissions data, they do not currently record all Scope 3 emissions. The Carbon Trust<sup>4</sup> categorises emissions into three categories or 'Scopes', defined as:
  - **Scope 1** – covers direct emissions from owned or controlled sources such as fuel combustion and emissions from fleet;
  - **Scope 2** – covers indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by the Authority; and
  - **Scope 3** – includes all other indirect emissions that occur in the Authority's procurement, supply and value chain. This would cover for instance

<sup>3</sup> [www.gov.uk/government/collections/government-conversion-factors-for-company-reporting](http://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting)

<sup>4</sup> [www.carbontrust.com/resources/briefing-what-are-scope-3-emissions](http://www.carbontrust.com/resources/briefing-what-are-scope-3-emissions)

purchased goods and services, business travel, employee commuting, waste disposal, use of sold products and investments.

- 10 The importance of addressing the purchased goods and services element of Scope 3 is underlined by research that shows that these can account for around 60% of an organisation's total CO<sub>2</sub>e footprint<sup>5</sup>. The Authority has set itself a target of capturing Scope 3 emissions data by the end of the 2021-22 financial year with the aim of fully reporting performance in 2022-23. The Authority will need to develop a comprehensive recording system to accurately capture and report all Scope 3 emissions and improve the way it captures and reports on Scope 1 and Scope 2 emissions and to help it develop its strategy for reducing carbon emissions.
- 11 In addition, there are significant gaps in baseline data for energy usage across the Authority's Estate. Until recently, it has been difficult to establish specific data in areas of high energy usage. The Authority is exploring a Building Management ICT System, which will allow the Authority to monitor and control heating across the estate and the Authority already has automatic meter reading devices for gas usage. This will help the Authority to improve the accuracy of existing information.
- 12 The Authority cannot effectively plan or deliver against the decarbonisation agenda without understanding its starting point. Staff we spoke with acknowledged that there are some weaknesses with Scope 1 and 2 data, but recent improvements in the monitoring of this data should give the Authority a more accurate picture to better evaluate carbon emissions in the future. However, without Scope 3 monitoring and reporting, it is difficult for the Authority to provide assurances that it is reducing its carbon emissions and is on track to meet the 2030 target. Currently suppliers are not contractually obliged to provide Scope 3 data, but the Authority has plans to introduce this requirement in any future contract agreements.
- 13 The Authority has shown good application of the sustainable development principle by recognising the risks of small local suppliers missing out on contracts due to lack of expertise in Scope 3 reporting requirements. It started to break down these barriers by meeting with local suppliers before tendering to better prepare them for any future bidding rounds, ensuring they are aware of the need to focus on sustainability, which is a step towards full Scope 3 reporting.

## The Authority is planning to reduce its carbon emissions, but needs to place more emphasis on specific carbon reduction actions to deliver its ambitious vision

- 14 As a minimum we would expect the Authority to focus on five core areas; the big-ticket items that will make a significant contribution to reducing CO<sub>2</sub>e. These are:
  - **Buildings** – improving energy efficiency and insulation in buildings, using sustainable materials such as green roofs and water harvesting systems in

<sup>5</sup> Welsh Government, [Welsh Procurement Policy Note WPPN 12/21: Decarbonisation through procurement – Addressing CO<sub>2</sub>e in supply chains](#), December 2021.



redevelopment and new build and developing and/or using renewable energy sources such as photovoltaic cells (PVC) and wind turbines on sites.

- **Procurement** – estimating value chain emissions by mapping out the high emission areas of procurement and identifying ways to reduce emissions when procuring goods and services.
- **Fleet** – reviewing current fleet performance, setting thresholds and creating optimised routes for standard travel. Consider alternatives to diesel and petrol vehicles and set out plans to go electric that cover vehicle replacement and charging infrastructure. Updating fleet replacement programmes and ensuring sufficient resources are set aside to meet the increased costs in switching to a low carbon fleet.
- **Land** – delivering carbon offsetting<sup>6</sup> and promoting environmental and biodiversity initiatives.
- **Ways of working** – reviewing operational policies and budgets to ensure carbon emissions are reduced in the way the Authority delivers its services. Using the Authority's wider influence to encourage others, and its own staff, to reduce carbon emissions in what they do and how they do it.

15 Despite not having an overarching strategy to reduce carbon emissions, the Authority has some wider plans in place which are broadly in line with most of these core areas. The Corporate Plan 2021-26 focusses on adopting a carbon reduction mindset throughout all activities through behaviour change, awareness raising to achieve better ownership, accountability and better reporting. The Plan outlines the measures for how it will successfully achieve its carbon reduction ambitions. These are:

- a 2% reduction in the Service's carbon footprint year on year through to 2026;
- an increase in the number of renewable energy sources installed at service locations;
- assessing energy efficiency campaigns, and ensuring improved outcomes are reflected in the carbon baseline;
- reporting on all Scope 3 emissions; and
- evaluating the waste management awareness training provided to staff to demonstrate a positive change in behaviour.

<sup>6</sup> Carbon offsetting comes from projects that reduce the amount of greenhouse gases entering the atmosphere and soaking up CO<sub>2</sub>e directly from the air. They must lead to real reductions or sequestration of carbon which needs to be measured and quantified. To ensure the validity of the projects they must meet rigorous conditions.

- 16 To support this, the Authority adopted a Sustainability and Environment Strategy 2020-25. Over this five-year period the Authority set nine objectives, of which decarbonisation is one. Actions include:
- identifying key areas for further carbon emission reduction and improvements in current approaches;
  - using Welsh Government funding to develop additional projects that reduce the Carbon Emissions;
  - creating a culture within the fire and rescue service that acknowledges and proactively reduces carbon emissions; and
  - increasing the Electric Vehicle Fleet to reduce CO<sub>2</sub>e from vehicles by ending the purchase of new diesel cars and vans.
- 17 These plans are broadly focussed on the right areas, with the exception of setting out clear actions on how the Authority intends to use land to offset emissions from its Diesel fleet. The Corporate Plan contains some measurable interim milestones to help the Authority progress towards the 2030 carbon neutral target, for instance with a 2% reduction in carbon emissions year on year to 2026. However, the Welsh Government expects organisations to budget for an average reduction of 37% in CO<sub>2</sub>e emissions from 2021 to 2025<sup>7</sup>. The Authority's plan would only reduce these emissions by approximately 8% in this timescale. The Authority could strengthen these plans by realigning targets with Welsh Government goals, and by making Sustainability and Environment strategy decarbonisation actions SMART<sup>8</sup> which will provide clearer parameters to help the Authority measure progress over time.

## **The Authority has a clear vision to become carbon neutral and is making good progress reducing emissions in some areas, but needs to address some big fleet and estates challenges**

- 18 Within an organisation, carbon is generated by both people, through their actions, and assets, through their design and use. In order to reduce emissions, it will be necessary for the Authority to target both asset design and behaviour. We found the Authority is taking tangible steps to implement systems to help reduce its emissions and is working to create a culture of sustainable thinking across the workforce, but there is limited capacity available to undertake the scale of work required to measure progress against a complex reporting framework.

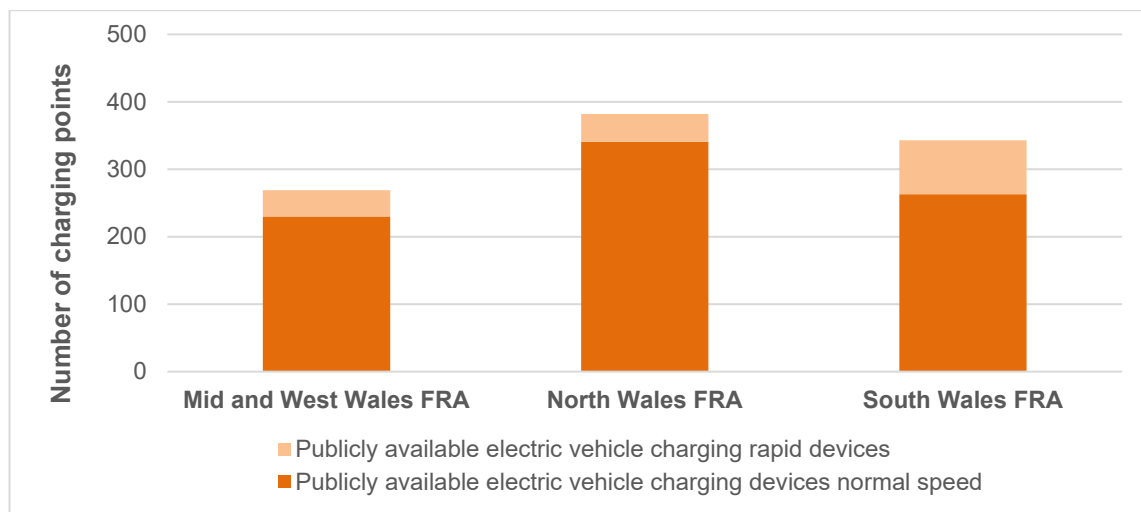
<sup>7</sup> <https://gov.wales/climate-change-targets-and-carbon-budgets>, Welsh Government Net zero pathway

<sup>8</sup> SMART goals stand for Specific, Measurable, Achievable, Relevant, and Time-Bound. Defining these parameters as they relate to a target helps ensure that delivery of objectives is attainable within a clear time frame.

- 19 For instance, the Authority has engaged with Waste and Resources Action Programme (WRAP) Cymru to review its procurement strategy and documentation to help it become carbon neutral. The Authority has also made progress establishing systems to accurately monitor fleet telematics and rationalising waste removal contracts across multiple providers into one contract, enabling the Authority to gain consistent information across the service.
- 20 A key area of risk which poses a barrier to reducing CO<sub>2</sub>e is the number of older, inefficient buildings, which the service plans to retrofit to modernise and increase efficiency. The Authority has 122 buildings in total, of which 23 hold Display Energy Certificates with an A to D rating, but the retrofitting programme is likely to be a substantial cost and it is not clear whether this approach is the most cost-effective method to secure reductions, given that these ageing buildings are likely to be a large carbon contributor despite the improvements. Sharing sites with other Emergency Services, public bodies and key partners like Natural Resources Wales, is one potential way of reducing cost and improving energy efficiency. Authority staff we heard told us how inefficient heating systems can be.
- 21 The world of fleet has never seen such a period of change and reducing CO<sub>2</sub>e from the Authority's fleet is a big priority. We found that the Authority has made good progress in electrifying its fleet, and has now electrified its pool vehicles, despite limitations in mileage. While this demonstrates the Authority's commitment to reduce emissions from fleet, some significant risks remain.
- 22 A significant area of risk to meeting the 2030 target is the continued reliance on heavy diesel vehicles, which make up all frontline fire appliances. Due to their specialist nature, these vehicles have long life policies and are more challenging to decarbonise. Switching to alternative models, while theoretically feasible in some locations, has to be balanced with the potential impact on operational capability. It is not always appropriate to move to smaller vehicles if this impinges on the Authority's ability to respond to an emergency. Importantly, the Authority is one of the first Fire and Rescue services in the UK to acquire government funding to pilot an electric fire appliance, although this is subject to a capability analysis. This project is still in its very early stages of development. With such a significant operational change, not just for Mid and West Wales Fire Authority but for other Fire and Rescue Authorities and the wider public sector, any pilot must be carefully evaluated, with findings shared widely to help inform future fleet programme planning.
- 23 There are some significant challenges to overcome in switching to a primarily electric fleet. For instance, through our audit work we understand that there are only two electric appliances on the market currently, but they cost in the region of £611,000 per vehicle. This is significantly higher than the amount usually spent on replacing diesel appliances and will require a significant capital investment if the Authority is to move to a fully electric fleet of appliances by 2030. Officers estimate that the cost of upgrading the 85 appliances by 2029-30 will be in the region of £39.5 million. This is higher than the Authority's total indicative vehicle programme budget for the next eight years.

- 24 In addition to having to spend much more on electric vehicles, the Authority will also need to consider the potential impact in future planning assumptions if electric vehicles need to be replaced more frequently and the notional 15-year lifespan of a diesel appliance will need to be reduced. Hydrogen vehicles, which could offer a workable solution, have been piloted by the Authority but were not considered a viable option due to issues around lack of infrastructure.
- 25 To fully realise the potential of electric fleet will also require adequate charging infrastructure across the Authority's area of operation. It is essential that there is a comprehensive and competitively priced electric vehicle charging network in place. If the charging network is perceived as inadequate, then this will be a major barrier to electric vehicle take-up by all public bodies. The scale of the shift to electric vehicles should not be underestimated. While it is difficult to know precisely how much charging will be needed, UK Government forecasts<sup>9</sup> suggest that at least 10 times more charge points will be needed by 2030 than currently exist.
- 26 To support this transition requires the Authority to work in partnership with other public sector bodies in its area of operation to make full use of the current charging infrastructure. We found that progress on this has been limited across Mid and West Wales to date and much work remains. ONS data shows that in October 2021 across the Authority's region there are 269 publicly available electric vehicle charging devices (all speeds), of which 39 are rapid charging units – **Exhibit 2**.

**Exhibit 2 – Publicly Available Electric Vehicle charging points by Welsh Fire and Rescue Authority area in October 2021**



Source: ONS, Electric vehicle charging device statistics: October 2021

<sup>9</sup> <https://www.gov.uk/government/publications/electric-vehicle-charging-market-study-final-report/final-report>

- 27 Adequate charging infrastructure is a particular issue for the Authority given its area of operation is primarily rural where infrastructure is limited. The Authority must work closely with partners to improve infrastructure and where appropriate to share charging points with other public sector partners.
- 28 Given these challenges it is unsurprising therefore that our survey of staff found that the main barrier to becoming carbon neutral is the cost of investment required in infrastructure, vehicles, offices and stations. We conclude that without significant investment in charging infrastructure and development of alternatives to diesel appliances, the Authority will find it difficult to deliver a carbon neutral fleet.
- 29 While avoiding and reducing emissions remains the Authority's priority, the ability to achieve Net Zero by 2030 will be extremely difficult without a form of offsetting due to the scale of technology and investment required. Carbon offset schemes allow public bodies to invest in environmental projects in order to balance out their own carbon footprints. The projects are most commonly designed to reduce future emissions and soaking up CO<sub>2</sub>e directly from the air through the planting of trees and other biodiversity projects. Some organisations offset their entire carbon footprint while others aim to neutralise the impact of a specific activity.
- 30 The Authority has not outlined its approach for using land in a sustainable way for carbon offsetting. This is likely to be of increasing significance, to offset the emissions created by its heavy diesel fleet, until a viable low carbon and cost effective alternative can be rolled out.
- 31 Changing how organisations work, consume products and services that come from natural resources, can measurably reduce CO<sub>2</sub>e. We found that the Authority has focused on some good initiatives to both change behaviours but also the way it delivers services. For instance, the Authority uses clothing recycling banks and has made a significant reduction in the number of single use plastic bottles it uses on a daily basis.
- 32 Similarly, the shift to home working brought on by the pandemic also helped the Authority reduce carbon emissions although the long-term impact of this has not been worked through. The Authority produced a COVID-19 debrief report, although this does not acknowledge the benefits restrictions had on carbon reduction, nor outline learning points from this to take the opportunities forward. The Authority is also continuing with online meetings (or hybrid meetings with some face-to-face) Carbon reduction was one of the considerations during its development, mainly around reducing commuter miles, although the impact of take-up amongst staff is not monitored in this way.
- 33 The engagement of employees into energy and carbon saving is an effective way to motivate staff and successfully achieve environmental goals. By taking a strategic approach to engagement, public bodies can establish shared ownership of carbon and energy targets and ensure that leaders are held to account. A robust and clear sustainability strategy should have employee engagement at its core.

- 34 The Authority has shown a strong commitment to longer-term innovation. Through the Sustainability and Environmental Group, the Authority has provided a forum to discuss innovative approaches, for example, considering the use of Hydro treated Vegetable Oil as a cleaner form of Diesel and exploring the use of treated waste water as a sustainable source of water for the extinguishing of fires. The Authority now needs to build on the work of the group and prioritise future activity. Staff we surveyed cited a lack of carbon reduction expertise as one of the main barriers to reducing carbon emissions, with lack of investment in infrastructure and financial cost of new carbon efficient technology being the main barriers. Staff also told us about the need for additional capacity to co-ordinate carbon reduction activities.
- 35 Strong leadership sets an ambitious vision, which is clearly enthusing staff at all levels. The Authority has more to do to cascade this vision to front line staff. One challenge has been the difficulty engaging with the on-call workforce, due to competing priorities and a small window of time these staff have available because of their ongoing training requirements. The Corporate Plan focusses on adopting a carbon reduction mindset throughout all activities through behaviour change, awareness raising to achieve better ownership, accountability and better reporting. As data reporting becomes more accurate, this will give staff the reassurance their actions are helping the Authority reach net zero.
- 36 Our survey of staff found that 53% of staff who responded did not know if the Authority was effectively monitoring their area of work's progress in reducing carbon emissions, indicating that there may be some scope to remind staff of the carbon reduction objectives and the tight timescales involved to meet the 2030 and interim milestone targets. Despite this, some good reporting of data at a station level is helping to create a positive culture of improvement through competition amongst station staff<sup>10</sup>.

## **Because of data limitations and gaps in performance reporting, evaluating progress to become carbon neutral is not yet possible**

- 37 As a minimum we would expect the Authority to establish performance evaluation systems that allow it to:
- judge how it is making progress to becoming carbon neutral by 2030;
  - show its improvement against Welsh Government targets of reducing overall carbon emissions by 58% in 2030; by 80% in 2040; and by 95% in 2050;
  - compare and benchmark its performance with other similarly sized Fire and Rescue Services to be able to identify opportunities for improvement; and

<sup>10</sup> The survey ran during November and December 2021 and we received 138 responses (73 from operational staff, 46 from support/other staff and 19 from senior management).

- monitor delivery of agreed actions for reducing CO<sub>2</sub>e in adopted Authority plans.
- 38 The Senior team receive monthly performance reports, but some staff acknowledged reporting to formal Member Committees could be more frequent. Members are actively involved in scrutinising the Authority's work on carbon reduction, with a Member Environmental champion who sits on the Sustainability Group. However, we heard that more training is required for wider Members on carbon reduction.
- 39 Fire Authority members receive quarterly updates on performance measures through the Performance Audit and Scrutiny Committee which includes progress against the wellbeing objective to reduce the Service's carbon emissions. Quarter three 2020-21 showed a Green RAG status<sup>11</sup>, compared to the previous two quarters' amber status, however the narrative in the reports does not show how the RAG rating was arrived at. The performance updates do not include any measure of overall progress to becoming carbon neutral, nor do they contain reference to benchmarking against other fire and rescue authorities. Benchmarking data is one area Members we interviewed told us could be improved and it would help them scrutinise current performance to identify opportunities for improvement.
- 40 Only a quarter of staff we surveyed thought the Fire Authority was on track to fully contribute to reaching the 2030 net zero target, with around half the respondents saying they did not know and a quarter saying they didn't think the Authority was on track.
- 41 The Authority has published data on its annual carbon emissions and other environmental data for several years through its Annual Sustainability report. The Authority has built on this by including this data on a dedicated webpage<sup>12</sup>, along with information on current service projects. The data is presented in an accessible and transparent way that makes it more meaningful to the public. However there is scope to enhance transparency by adding performance against national targets.

<sup>11</sup> 'Red; Amber; Green' status – a common scale for measuring performance measures, with red being the highest level of risk and green the lowest.

<sup>12</sup> <https://www.mawwfire.gov.uk/eng/about-us/our-plans-and-performance/environmental-and-sustainability-annual-report/service-statistics/>



Audit Wales

24 Cathedral Road

Cardiff CF11 9LJ

Tel: 029 2032 0500

Fax: 029 2032 0600

Textphone: 029 2032 0660

E-mail: [info@audit.wales](mailto:info@audit.wales)

Website: [www.audit.wales](http://www.audit.wales)

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