



Ministry
of Justice

Net Zero Carbon Strategy

2024



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Foreword



The Ministry of Justice (MoJ) impacts the lives of millions of people every year, and our buildings are essential public infrastructure existing to advance the outcomes of public safety, offender rehabilitation and swift access to justice. Our prison and court estate is the second largest within central Government and is highly specialised, challenging to decarbonise, and susceptible to the impacts of the changing climate.

Our task is to continue delivering our justice outcomes while transforming the department into the net zero organisation required of the future, and in line with the Climate Change Act which commits the UK to achieve net zero carbon emissions by 2050. We also need to protect our operations and estate against energy cost inflation and energy supply insecurity.

Additionally, our net zero transition has the potential to improve justice outcomes beyond protecting the environment, through green collar jobs and upskilling. Offenders within prisons already produce LEDs for installation on our estate, which helps reduce our emissions, whilst providing offenders with the experience and skills to enter green economy employment on release. And through our Community Payback sentencing, where offenders on probation plant thousands of trees, we help the UK sequester carbon, whilst providing visible justice and environmental improvements to local communities.

This Net Zero Carbon Strategy sets out our ambitions to reduce and then eliminate carbon emissions over the coming decades. We are aiming to remove legacy coal and oil-fired heating systems by 2030. We will ensure our prison capacity expansion both eliminates the use of fossil fuels and reduces its embodied carbon footprint. We will transition our vehicle fleet away from fossil fuels to zero emission vehicles and put in place the charging infrastructure to ensure they operate effectively. And we will also quantify and reduce the Scope 3 carbon emissions associated with MoJ's operations and purchase of goods and services.

Achieving all of this will require concerted effort across MoJ and its agencies, and this new strategy provides the framework and sets our direction towards meeting net zero.

Carl von Reibnitz

Chief Sustainability Officer, MoJ

Case for change

Climate change is the defining challenge facing current and future generations. The increased severity and frequency of weather events such as heatwaves, flooding, and drought will impact us all, and the places we live and work in.

These impacts can be significant on those within the justice system and particularly on those who are in our custodial estate. We cannot easily re-house prisoners in the event of a prison being flooded or affected by a heat wave, as suitable alternative accommodation is already significantly constrained. Similarly, we must be able to provide safe, reliable water supplies to our prisons in the event of droughts.

The MoJ is responsible for approximately 20% of greenhouse gas emissions across all government departments. We operate one of the largest property portfolios of any government department and have a duty to reduce our emissions to benefit both our own operations and the UK.

Our estate is ageing and difficult to maintain and increasing costs make it challenging to improve the condition of our buildings. We are almost entirely reliant on the National Grid and our energy suppliers to provide energy to our estate, presenting us with risks to energy security, resilience and escalating energy prices.

We must work to ensure our estate is fit for the future and low carbon in its operation to respond to the challenges of climate change, and we have a moral and legal duty to provide decent conditions for prisoners, which in turn supports our priority to reduce reoffending. Climate change, and the rise in carbon emissions that are driving it, have a direct impact on prisoners' lives and on the MoJ's ability to keep the public safe. Climate change is therefore a material risk to the MoJ, and the people that it is responsible for.

MoJ commitments and targets

The UK government has made a binding commitment through the Climate Change Act (2008) to achieve net zero carbon emissions by 2050.¹ This commitment flows through all government departments and arm's lengths bodies and is captured in the Greening Government Commitments (GGC) framework.²

The MoJ has committed to delivering a 41% reduction in our total carbon emissions (Scope 1³ and 2⁴), as defined by the international Greenhouse Gas Protocol, and a 23% reduction in our Scope 1 direct emissions by 2025. We will ensure that our eligible fleet vehicles have transitioned to zero emissions by the end of 2027.

1 **Climate Change Act 2008 (legislation.gov.uk)**

2 **Greening Government Commitments ([GOV.UK](https://gov.uk))**

3 Scope 1 (direct) emissions are the CO₂ emissions released from the direct burning of fossil fuels across the MoJ. This includes the gas, oil, biomass and coal used in our heating systems and the diesel used in our stand-by generators and fleet vehicles. In the GGC, they are referred to as non-traded emissions.

4 Scope 2 (indirect) emissions are the CO₂ emissions released from energy we consume that is produced by third parties. This is predominantly associated with the electricity we consume, but also includes carbon associated with the heat we take from district heating networks. In the GGC, they are referred to as traded emissions.

We recognise that action cannot stop at 2025, and we will make a significant contribution to meeting the government commitment to reduce Scope 1 emissions from the public sector by 50% by 2032⁵ and by 75% by 2037⁶, against a 2017 baseline.

MoJ is aware that its overall carbon footprint is larger than just its Scope 1 and 2 emissions and includes indirect emissions from activities that occur within the wider value chain, from the goods and services we buy to emissions from business travel. We will develop a baseline Scope 3⁷ emissions footprint by end of FY23/24 and a timed action plan by end of FY24/25. We recognise that wider understanding of Scope 3 emissions and the actions that are being taken to reduce them is developing rapidly around the world. We will therefore review our Scope 3 reduction plans annually to ensure they remain aligned to the most current best practice, so we can respond accordingly to emerging pan-government requirements.

Scope

The scope of this strategy is set by the GGC which apply to the whole of the MoJ, including all of its agencies and arm's length bodies. This strategy covers the MoJ's head office functions, His Majesty's Prison and Probation Service (HMPPS), His Majesty's Courts and Tribunals Service (HMCTS), and all associated bodies. We will review and update the scope and content of the strategy annually to reflect future changes to the GGC, any wider pan-government net-zero developments, and emerging national and international best practice.

Legislation

The Climate Change Act (2008) and its subsequent amendments has helped to ensure that the UK's overall direction of travel on climate change has remained focused on achieving the 2050 target. It has set legally binding obligations on the UK to meet net zero emissions by 2050, supported by interim targets and five-year carbon budgets that define specific carbon reduction requirements over smaller time horizons. It has also introduced a programme of statutory national risk assessments and an Adaptation Programme to address the risks. The Climate Change Act is the primary vehicle to deliver the UK's international commitments made under the 1997 Kyoto Protocol and 2015 Paris Agreement.

5 **UK Government Clean Growth Strategy** (2017)

6 **UK Government Net Zero Strategy** (2021)

7 Scope 3 (indirect) emissions are all indirect emissions (not included in Scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions – Greenhouse Gas Protocol.

Costs and benefits

Achieving net zero carbon emissions for our Scope 1 and 2 footprints will require significant investment across the MoJ. Our buildings, which will be the main focus of our net zero carbon delivery programme, account for 252,216 tCO₂e. The estate varies significantly in age and size, with buildings dating from the late 1700s through to the modern day. Many of our buildings are historically significant and have listed status. To make our buildings net zero and resilient to climate change, we must invest in improving their energy efficiency, increasing our onsite renewable generation, and removing fossil fuels.

The cost of achieving net zero is yet to be established, and we will work to better understand this over the next 12 months.

As an organisation we spend nearly £130 million every year on powering our estate, which could likely increase should fuel price inflation continue. This price uncertainty and exposure to volatile international energy markets place a significant cost pressure on us, and anything we can do to provide stability will help us run our establishments more effectively. Investment in net zero will transition us away from fossil fuels and towards all-electric buildings. We can create a significant proportion of our own electricity needs by deploying more renewable energy generating assets across our estate, giving us access to low-cost, zero emission power. This will give us greater separation from the energy market and reduce our reliance on the grid.

Interdependencies

Delivering net zero at MoJ will require a collaborative approach and a cultural shift involving our staff, prisoners, visitors, court users, delivery partners and supply chains. To drive this shift, it is imperative that we meaningfully engage with stakeholders to mobilise behaviour change to deliver our aims. We will need to review the way we work and the way we operate our buildings to maximise efficiency. Building services within our low carbon buildings will be more sophisticated, requiring more focused management, so we will update our Facilities Management contracts to reflect this need and strengthen the capability of our partners to support our goals.

To futureproof the MoJ estate and its operations, we will need to work closely with stakeholders across the department to align activities to ensure we are working towards common goals. We will pay particular attention to climate change adaptation and embedding practises, to ensure that activities are mutually supportive of the department's outcomes and feed into property projects, policies and operations across the department.

We recognise that this strategy is focused on the department's most immediate challenge, which is the elimination of fossil fuels. We also recognise that there are strong interdependencies between this strategy and other MoJ strategies. Our Water Efficiency Strategy will reduce the amount of water we consume and need to treat, which will reduce our associated Scope 3 carbon emissions. Our Nature Recovery Plan will create increased areas of biodiverse habitat that will sequester carbon, contributing to emissions reduction. Our Circular Economy Strategy will reduce the quantity of goods and materials we buy and increase the re-manufacture and reuse of products. This will reduce MoJ's emissions associated with the purchase of new goods and the disposal and landfilling of waste materials. We will ensure that our strategies are co-ordinated and will assess their mutual interactions and impacts.

Our vision and strategic objectives

The MoJ plays a key role in the government's drive to net zero and aims to be a leader in central government for emissions reduction. We recognise that our estate is one of the most challenging of any central government department due to its complexity, overarching security requirements and critical nature. As such, successful delivery of net zero targets across MoJ will demonstrate to other public bodies that achieving net zero can be achieved in a cost-effective and efficient manner.

NET ZERO
2050



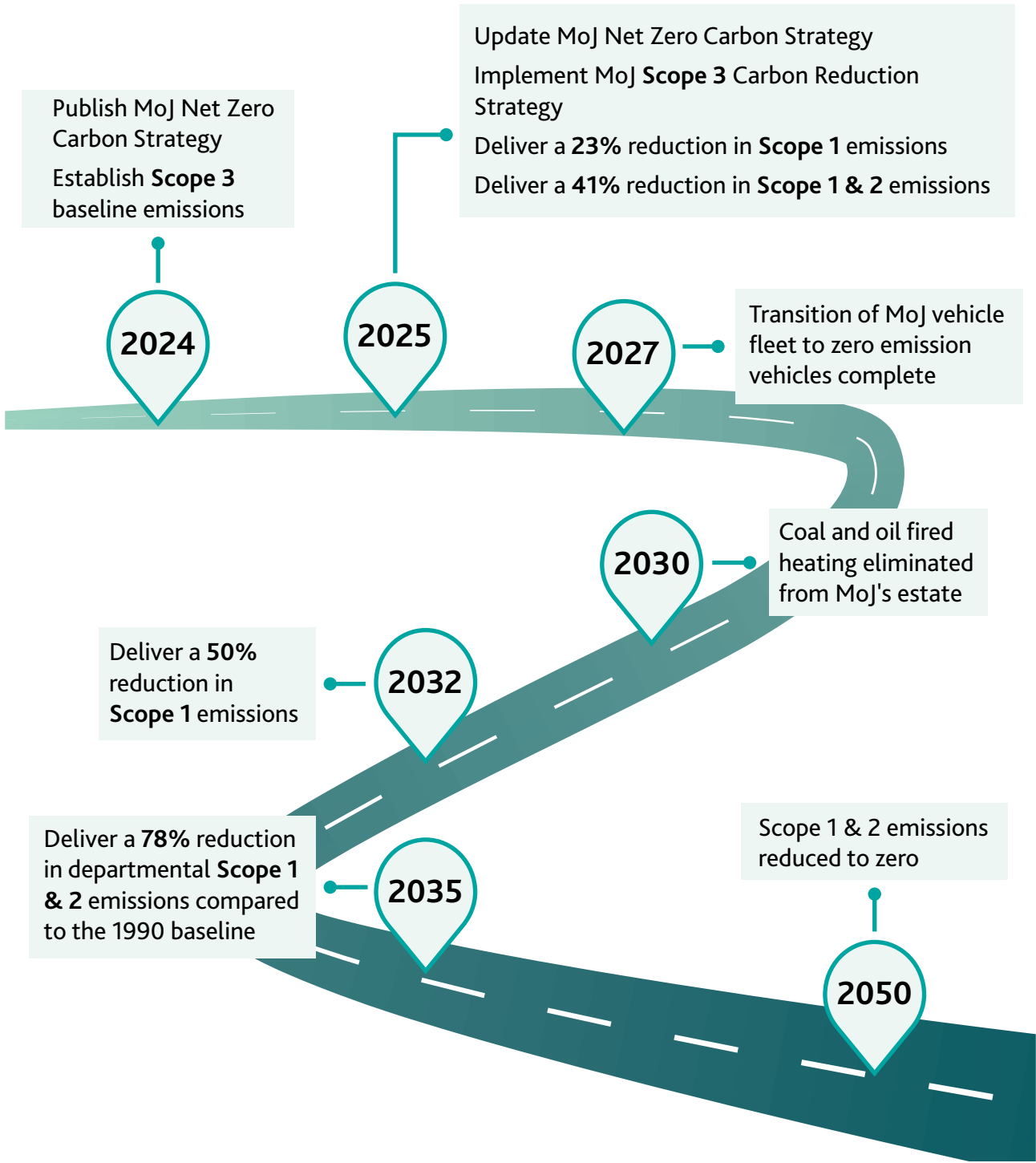
Our immediate focus will be on Scope 1 and 2 emissions in line with GGC reporting requirements. This reflects our more established understanding of these emissions and our ability to drive change in areas where we have direct control. However, it is clear that our carbon footprint is much larger than just our Scope 1 and 2 emissions, and we will improve our understanding of our Scope 3 emissions to allow us to put in place deliverable plans to reduce our impact.

MoJ's New Prisons Programme has been approved by HM Treasury. The final business case included nearly £100 million of investment to deliver four new prisons to near net zero emissions on the day of opening. Each prison will use 70% less energy from the national grid and will emit nearly 90% less CO₂ over its lifetime than the recently opened HMP Five Wells.

Our vision is to reduce our **Scope 1 and 2** carbon emissions to net zero **by 2050**. We will calculate our baseline Scope 3 emissions by the end of FY23/24 and will develop a comprehensive Scope 3 action plan by the end of FY24/25. We will take an active role in supporting the development and implementation of wider government policy on Scope 3 measurement and reduction.

Figure 1 below shows a timeline of our objectives and milestones.

Figure 1: MoJ's net zero carbon objectives



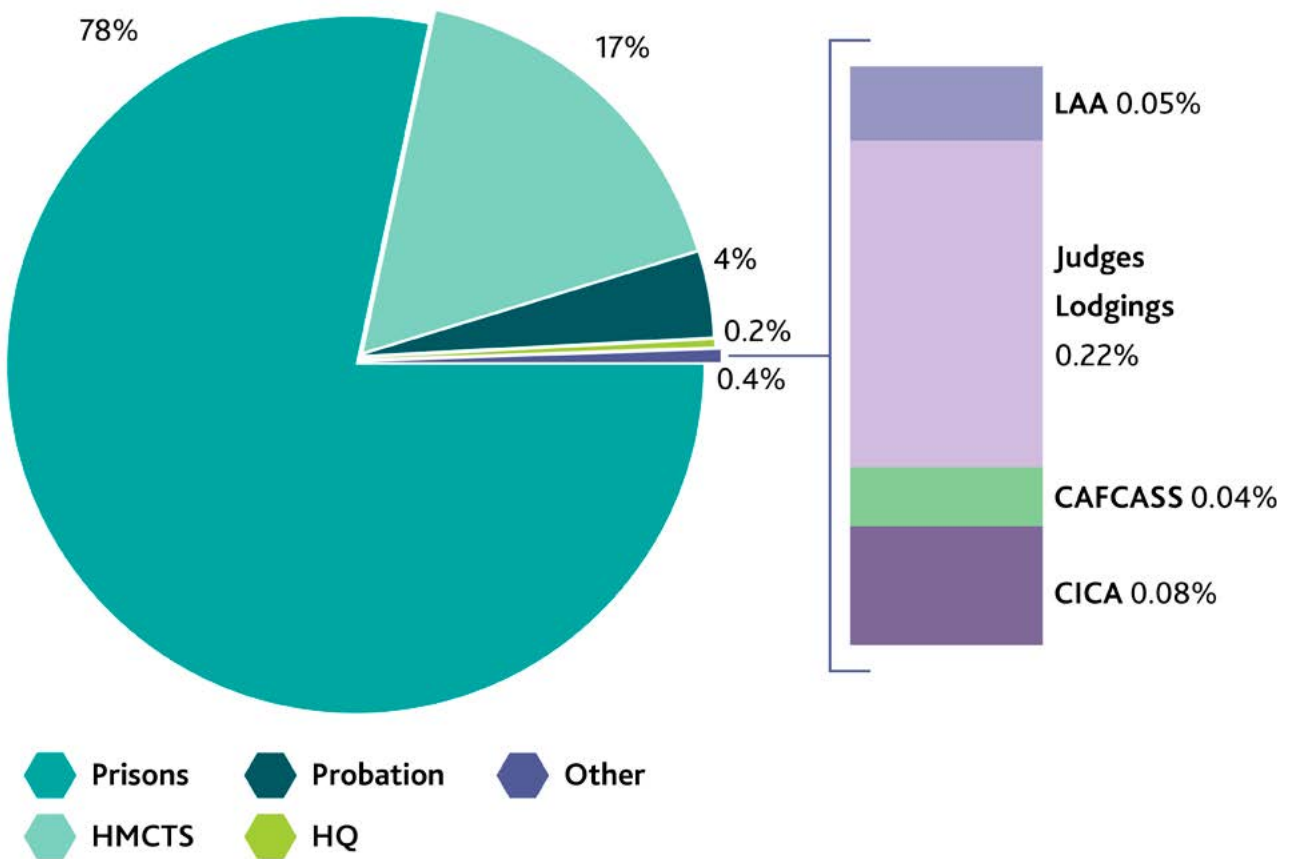
Scope 1 emissions

Current performance

Moj's Scope 1 emissions were nearly 170,000 tCO₂e in FY22/23. Approximately 90% of those emissions were from the combustion of natural gas to heat our buildings and generate hot water. Approximately 10% was from the combustion of other fuels, including heating oil, diesel, biomass/biodiesel and coal. A trace amount was from fuel use across the Moj-operated vehicle fleet.

Figure 2 below shows how our Scope 1 emissions were split across the Moj.

Figure 2 – Moj departmental Scope 1 emissions

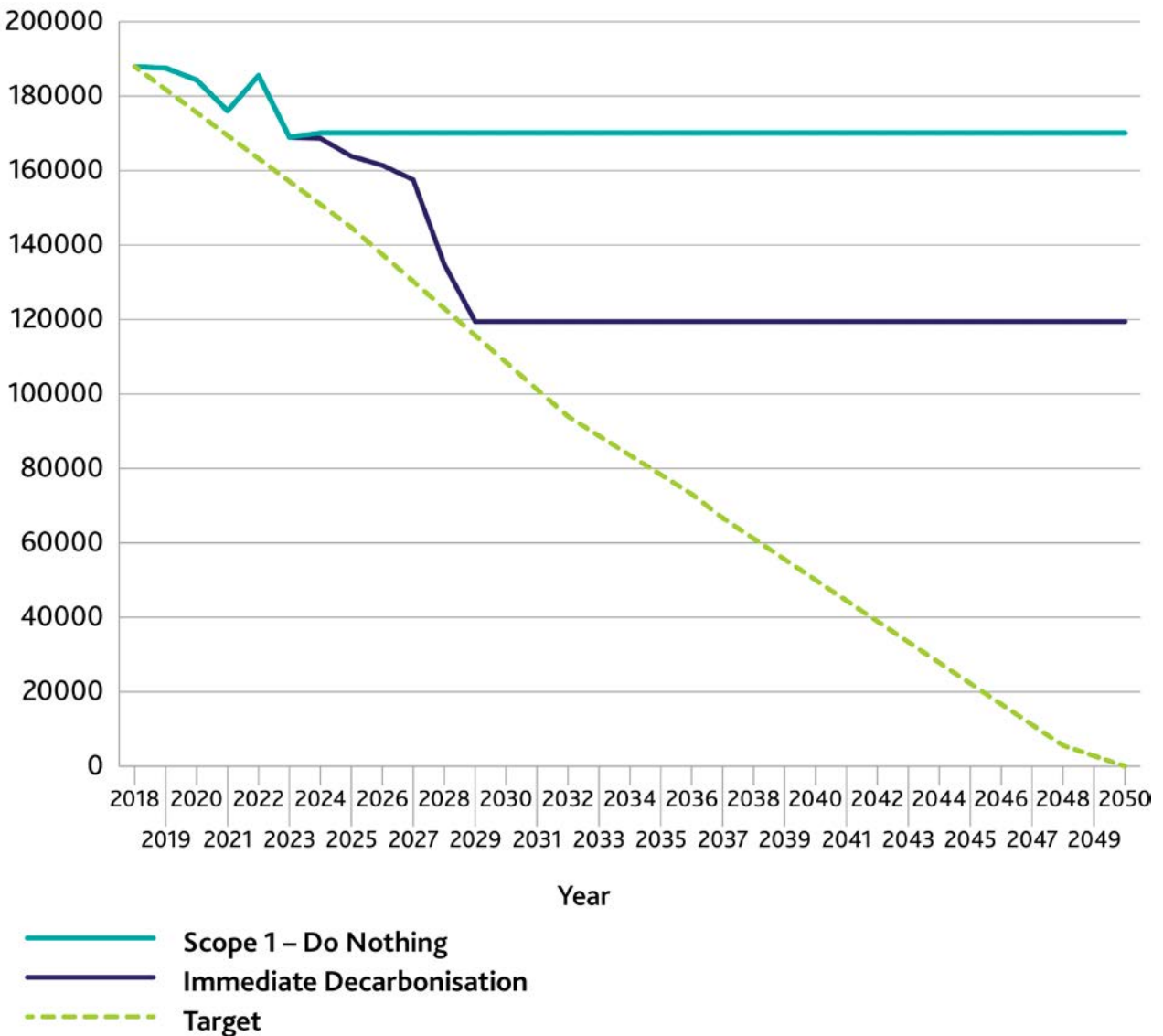


Our Scope 1 trajectory

Our Scope 1 emissions arising from the direct combustion of fossil fuels will not reduce without us taking direct action to address them. Significant investment over the next 20 to 26 years will be required to remove fossil fuels from our estate. Our Scope 1 emissions are primarily associated with the generation of heat and hot water for our buildings, with a smaller amount associated with operating our life safety systems and vehicle fleet.

Figure 3 – Scope 1 emissions trajectory

Scope 1 emissions (tCO₂e)



Technical solutions

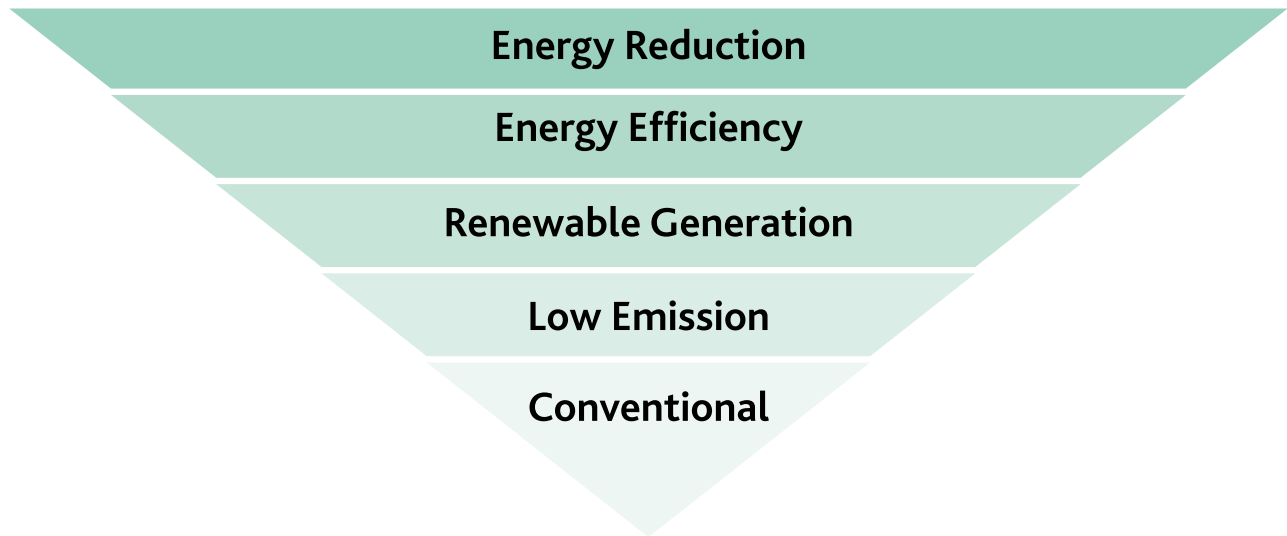
Emissions from our buildings



Our buildings are responsible for nearly 98% of MoJ's Scope 1 emissions.

Reduction of these emissions is our immediate priority and will deliver the greatest carbon saving benefit.

We will deliver Scope 1 reduction in line with the principles of the Energy Hierarchy:



Case study



Safe, secure and sustainable prisons

Due to open in 2025, HMP Millsike will be the UK's first all-electric prison, eliminating the need for fossil fuel heating.

Fitted with solar panels and heat pumps, it will use around a quarter of the energy used to heat a traditional Victorian prison, such as HMP Wormwood Scrubs. The prison will also help reduce our carbon footprint by emitting nearly 90% less CO₂ than other traditional prisons.

The new infrastructure is playing an integral role in boosting the economy and supporting local businesses, with around 40% of construction orders sourced from within 50 miles of the site. This means local businesses in the supply chain will directly reap the benefits.

During the construction phase, the prison will create hundreds of local jobs and meaningful work for approximately 50 ex-offenders. When completed, it will provide around 600 new jobs within the local community.

1. We will take action to reduce energy wastage, providing guidance to staff and prisoners on how to reduce energy consumption through simple actions such as closing windows to avoid heat loss, turning off heating in unoccupied rooms and reducing temperatures in other spaces. We will continue to upgrade our Building Management Systems to ensure energy consuming equipment is only used when needed and is operated efficiently. We will also monitor and measure our consumption to identify opportunities to reduce energy use.
2. We will improve the energy efficiency of our buildings by reducing heating and cooling demand. On the prison estate this can be achieved by improving the insulation of the building fabric, focusing on buildings where we can reduce heat loss and gain through walls, floors and roofs. We will replace windows and doors to reduce draughts and thermal bridges to conserve heat inside buildings. These activities will be included within our major maintenance projects to ensure upgrades are delivered as efficiently as possible. We will also incorporate low carbon solutions into our new build and refurbishment projects to minimise the need for energy intensive heating, cooling and ventilation systems. Where possible, we will use passive technologies that have multiple benefits, such as green roofs, to reduce heating and cooling requirements while simultaneously providing biodiversity and climate change adaptation benefits.
3. We will ensure heat and hot water is generated efficiently and only distributed to where it is required, and that pipework is insulated. We will continue our deployment of boiler management systems to optimise boiler performance, coupled with rolling upgrades of our building management systems and water pumps to ensure systems operate as effectively as possible.

4. We will use heat pumps to generate low carbon heat and hot water and will pilot technologies, such as high temperature steam generation, solar thermal and anaerobic digestion, and will investigate and consider other emerging innovations. We will also ensure our heating plants, which currently operate on biomass or biofuel, are maintained to ensure they continue to deliver long term carbon savings. Where possible we will connect our buildings to local district heating networks.



We aim to eliminate coal and fuel oil from our heating system by 2030 and have commenced the rolling replacement of gas fired boilers with low or zero carbon alternatives (where feasible), as buildings have their heat demands reduced through building fabric upgrades.

5. We recognise that not all our sites will be able to transition to zero emission heating systems immediately due to challenges with funding and affordability, and operational and technical constraints such as a lack of availability of sufficient electricity at sites to operate heat pumps. In these cases, we will use bridging technologies where feasible, such as hybrid heat pumps and biofuels, ahead of us being able to deliver complete elimination of fossil fuels.
6. All of our prisons have stand-by diesel generators in the event of failure of the national electricity grid. We will transition our stand-by generators from fossil fuel to zero emissions technologies by 2030. This may include battery storage linked to on-site generation or hydrogen fuel cells. We will use sustainable fossil fuel replacements such as hydrogenated vegetable oil as a transition step where feasible.
7. We will work with private finance providers to develop a business model that attracts investment from the private sector to decarbonise our heat. This will allow government investment to be spent on delivering MoJ's strategic investment while stimulating the green economy.



The MoJ's New Prison Programme is our first large scale rollout of heat pumps. Each of the four new prisons will be heated using air source heat pumps which will receive a significant proportion of their energy demand from on-site renewables. The new generation of prisons will emit nearly 90% less CO₂ over their operational lives than the recently opened HMP Five Wells.

Case study



Boiler optimisation

The MoJ has invested in 500 gas boiler optimisation units across the prison estate, which improve efficiency by better regulating boiler firing.

The retrofitted units reduce gas consumption by 10% on average and are generating an annual saving of 2,900 tonnes of carbon dioxide equivalent (CO₂e) and £450,000. The boiler optimisation programme has paid for itself within two years of installation.

Emissions from our vehicles

Emissions from our vehicle fleet account for just over 2% of MoJ's total carbon emissions. We are committed to delivering our GGC target of transitioning our eligible fleet vehicles and pool cars to be zero emission by the end of 2027.

We will achieve this by:

1. Developing our electric vehicle charge point (EVCP) infrastructure policy and applying it across our estate. We will continue to add EVCPs to car parking spaces across the estate, alongside future proofing our car parks to enable EVCP expansion when demand reaches sufficient levels.
2. Subject to funding, we will develop a programme to transition MoJ's in-scope vehicle fleet to be zero emission by 2027. We will deliver this through a programme of rolling lease renewals and direct purchases. Consideration will be given to the very specific front line needs of the department, the market for viable alternatives, and the security of our staff, prisoners and the wider public.

Case study



Electric Vehicle Charge Point (EVCP) Rollout

Over the last 3 years we have installed 278 electric vehicle charge points across 60 prisons, and 4 charge points at our headquarters.

To support the transition of MoJ fleet to meeting the Government 100% zero tailpipe emission car and van target by December 2027, we have invested in 339 low emission vehicles across MoJ, including Plug-in Hybrid Electric Vehicles (PHEV) and Electric vehicles (EV).

Scope 1 interdependencies

Transitioning away from fossil fuels requires other forms of energy to be available. Primarily this will require more electrical capacity from the national grid to operate electric rather than gas fired heating systems, and to charge electric vehicles. MoJ will take steps to reduce its consumption of electricity to create as much opportunity as possible to support the decarbonisation of heating. We are also reviewing emerging opportunities around heat networks, anaerobic digestion, pyrolysis and hydrogen, alongside exploring energy storage technologies such as batteries to better manage periods of peak demand.

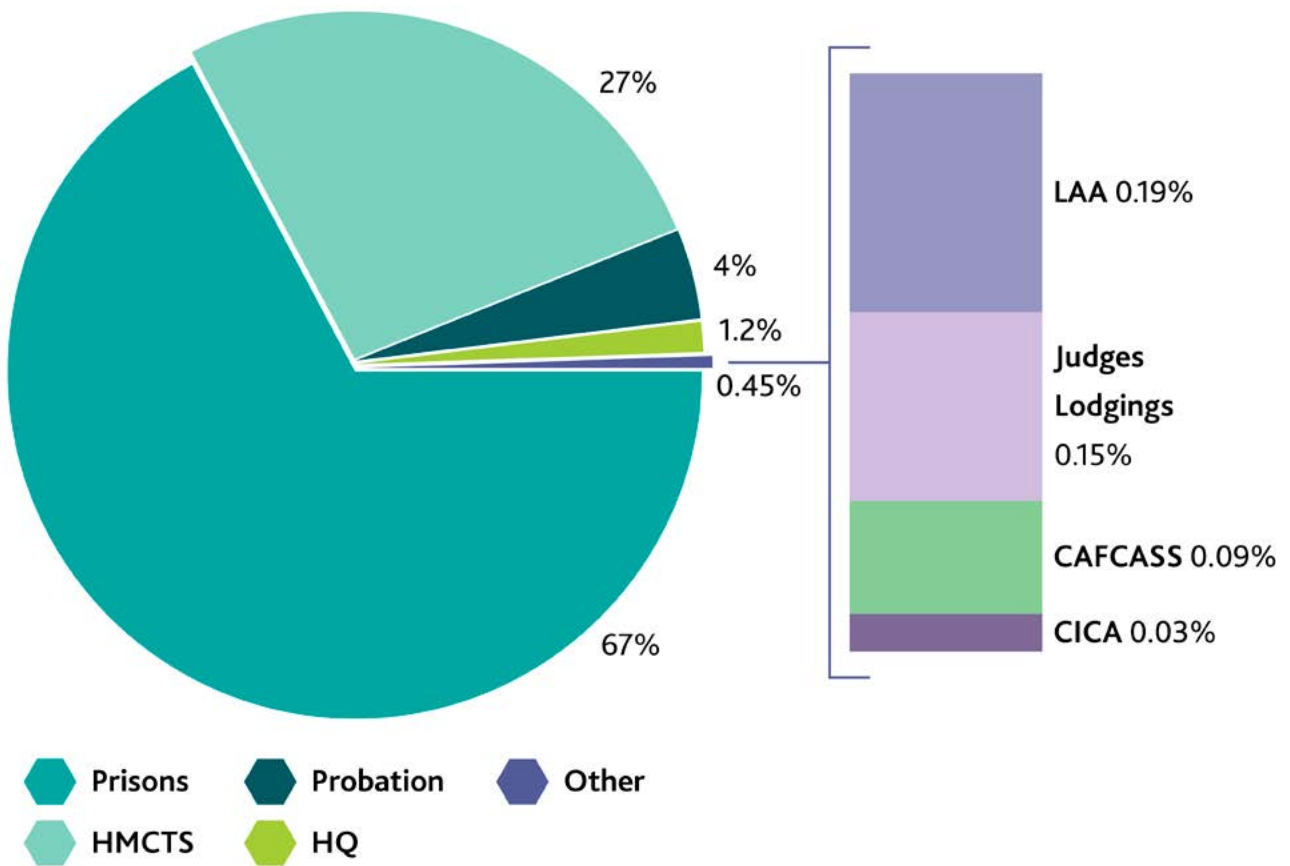
Scope 2 emissions

Current performance

Moj's Scope 2 emissions were approximately 83,228 tCO₂e in FY22/23. These emissions were almost entirely from electricity consumption in our buildings, with a trace amount from charging electric vehicles. Almost 67% of our Scope 2 emissions were from the custodial estate, with HMCTS responsible for 27%.

Figure 4 below shows how our Scope 2 emissions were split across the Moj.

Figure 4 – Moj departmental Scope 2 emissions

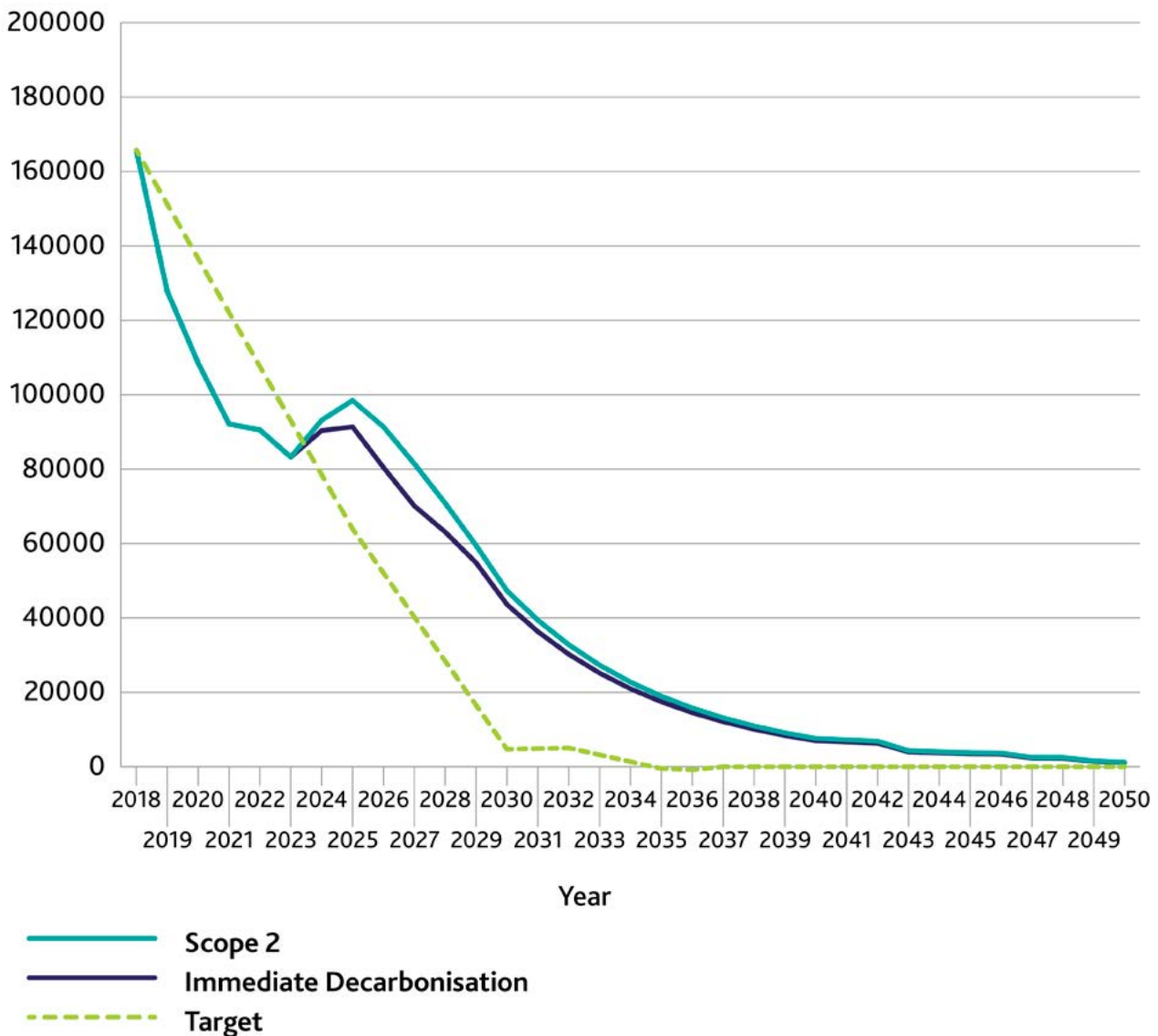


Our Scope 2 trajectory

Our Scope 2 emissions are intrinsically linked to the wider decarbonisation of UK electricity generation, which is responsible for a significant reduction in our emissions. This has been supported by investments we have made on our estate to reduce electricity consumption, including large scale deployments of LED lighting across our estate and investments in renewable energy generation. Recent grid decarbonisation forecasts indicate that we will be close to achieving our targets by 2050, however further investment will be required to remove our residual emissions.

Figure 5 – Scope 2 emissions trajectory

Scope 2 emissions (tCO₂e)



Footnote: The increase in emissions in 2024 is a forecasted increase in electricity consumption due to additional prison capacity and the replacement of fossil fuel fired heating with electrical heating.

Case study



LED manufacturing

At HMP Garth, prisoners assemble low-energy LED lights to develop valuable skills, reduce prison energy use and save money.

The pilot project, which has since been introduced at HMP Full Sutton and HMP Guys Marsh, costs 36% less than the original fittings, uses 62% less electricity and is expected to save around £2.5 million each year once installation is completed across the prison estate.

Technical solutions

Our buildings are currently responsible for nearly all our Scope 2 emissions. This will change in the future as our use of electric vehicles increases and we displace Scope 1 fossil fuel emissions with Scope 2 electricity emissions.

Our focus on removing fossil fuels from our carbon footprint will increase our consumption of electricity, but reduce our overall carbon emissions. Our increase in electricity demand will create pressure on the national grid. We will pay particular attention to how we use electricity across our sites to minimise fossil fuel demand within the electrical capacity we have available from the grid. We will deploy the following solutions:

1. We will continue to focus on reducing electricity demand across our buildings. We will deploy energy efficiency technologies to reduce consumption, in particular through the installation of high efficiency LED lighting across all our buildings. We will continue updating the Building Management Systems across our sites, including the use of digital twin modelling to optimise the running of our building services. We will continue to replace motors with high efficiency variable speed units to allow us to fine tune operations. Phase balancing will be used to maximise the power that is delivered to our sites.
2. Our building services are the dominant electricity consuming equipment across the MoJ estate. However, our security and data systems also consume electricity, so we will continue to deliver our IT strategy to transition to more efficient digital systems.
3. We will use the roof space and land across our estate to generate our own power. Deploying solar panels and wind turbines, coupled with battery storage, will be explored to provide free power to our sites and improve our energy security.
4. We will seek to enter into Power Purchase Agreements where feasible, and subject to HM Treasury approval, to source our electricity from UK-based renewable energy generation to supplement our own production. This will provide long-term energy cost certainty to MoJ, along with ensuring that all electricity we consume is from secure, 100% renewable sources.



In 2021 and 2022, we installed 4.6 MW of solar arrays across our prisons and courts, generating nearly 4.5 GWh of electricity and reducing our carbon footprint by approximately 1,000 tonnes per year.

Scope 2 interdependencies

Delivering greater efficiencies through the way we use electricity and generating more of our own power are both critical to achieving reductions in our Scope 1 emissions. Without reducing our consumption, we will require significant upgrades to the electricity supplies to each of our sites, which will increase costs and place higher demands on the UK's electricity networks.

Moj's Scope 2 emissions are fundamentally linked to grid decarbonisation. Continued investment in removing fossil fuels from UK electricity generation is required to deliver the commitments made in the UK's Net Zero Strategy and subsequently support Moj's carbon emissions reduction.

Scope 3 emissions

Current position

The GGC have placed immediate focus on reducing our Scope 1 and 2 emissions. We have not yet quantified our Scope 3 emissions; however, we recognise that activities within our value chain can have a significant impact on our overall carbon footprint. Over this strategy period we will refine our understanding of our Scope 3 emissions and aim to take subsequent action to address these, which in turn will enable us to obtain a broader view of our emissions landscape and to prioritise our decarbonisation efforts accordingly.

Activities 2023 to 2025

Scope 3 emissions are generated from activities that occur in the value chain, including from the goods and services we buy for business travel. The MoJ is a large, complex organisation with a multi-faceted supply chain. Our first action will be to establish an initial baseline of Scope 3 emissions, which will be refined iteratively over time as data improves, and our work will require input from stakeholders across the MoJ.

In FY23/24 we will:

- establish governance and processes around Scope 3 work
- establish an initial baseline of Scope 3 emissions
- begin development of a Scope 3 action plan

As an output of this work, we will be better informed of the highest carbon emitting areas within our value chain and will be able to prioritise our actions accordingly. Improved understanding should also lead to opportunities to make more informed buying decisions around products and services. Through this work we will also develop an approach to addressing residual emissions, aligning with wider government policy.

Metrics

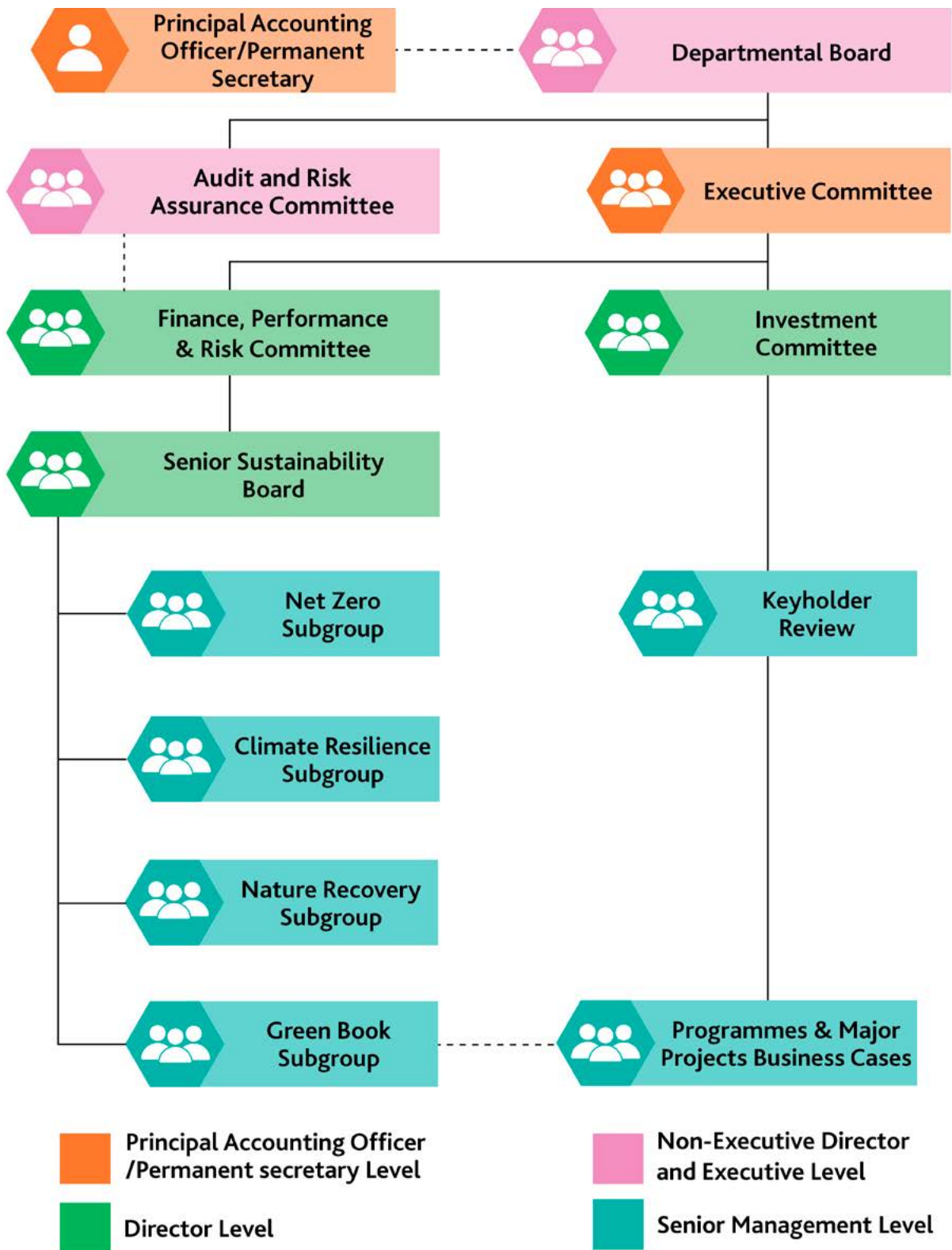
We will measure our performance against the following metrics. Outcomes will be reported in our annual GGC summary report and MoJ's Annual Report.

Metric	Description
% of energy supplied from coal	Annually report the percentage of our total energy consumption that is provided from coal, with a target to eliminate all coal from our energy mix by 2030.
% of energy supplied from oil	Annually report the percentage of our total energy consumption that is provided from oil/diesel, with a target to eliminate all oil from our energy mix by 2030.
% reduction in Scope 1 emissions against 2017/18 baseline	<p>Deliver a 23% reduction in Scope 1 emissions by 2025, compared to 2017/18.</p> <p>Deliver a 50% reduction in Scope 1 emissions by 2032, compared to 2017/18.</p> <p>Deliver a 100% reduction in Scope 1 emissions by 2050, compared to 2017/18.</p>
% reduction in Scope 1 and 2 emissions against 2017/18 baseline	<p>Deliver a 41% reduction in Scope 1 and 2 emissions by 2025, compared to 2017/18.</p> <p>Deliver a 100% reduction in Scope 1 and 2 emissions by 2050, compared to 2017/18.</p>
% of fleet vehicles that are zero emission	All fleet vehicles within scope to be zero emission by 2027.
% reduction in Scope 3 emissions compared to the 2022/23 baseline	<p>Establish the MoJ's Scope 3 baseline carbon emissions by 31 March 2024.</p> <p>Develop Scope 3 action plan, with implementation to have commenced by April 2025.</p>

Governance

We have established governance structures to hold ourselves accountable for the delivery of this strategy. Ultimate accountability for achieving our objectives is held by the Permanent Secretary. Authority has been delegated by the Permanent Secretary to the Senior Sustainability Board (SSB) which is responsible for ensuring that our targets and objectives are clearly communicated through all departments in the MoJ, and that senior sponsors are identified for each party. We have also established a Net Zero Working Group which tracks the progress of active net zero projects and pipeline projects and oversees financial governance and project delivery.

Delivering climate change adaptation, energy security and net zero carbon objectives are all material risks to MoJ, and as such our activities are also overseen by the Audit Risk & Assurance Committee and Finance Risk & Performance Committee. These committees report directly to the departmental board and executive committee respectively. We will also establish a Net Zero Programme working group to track progress on our current net zero projects and commitments within this strategy.



Our internal project controls require the impacts of any project on our carbon emissions to be assessed, and all options appraisals to consider fully sustainable options. Whole life cost is used to assess options, with a full validation required if the most sustainable option is not pursued, where this is the conclusion of the options appraisal.

Our performance against our GGC targets is not currently independently assured. We will work with HM Treasury, Cabinet Office, the Government Internal Audit Agency and National Audit Office to establish an independent audit of our carbon accounting and performance, which will sit alongside our financial controls to strengthen our assurance processes and ensure we deliver our commitments.

Risks

Strategic risks that will prevent the successful implementation of this strategy, the delivery of our targets, and the proposed mitigation to be employed to reduce risk, are summarised below:

Risk	Likelihood	Impact	Risk treatment
Savings are not delivered because MoJ is not able to source sufficient funding to implement the strategy.	Medium	High	<p>Document climate change and energy security on the organisational risk register to articulate the strategic impact on MoJ operations.</p> <p>Prioritise spend-to-save initiatives to create budget capacity for delivering additional projects.</p> <p>Investigate alternative sources of funding, including private finance to deliver long-term energy reductions.</p>
Grid decarbonisation does not deliver Scope 2 emissions savings, resulting in further investment required from MoJ.	Low	High	<p>Invest in MoJ-owned renewable generation to insulate our carbon emissions from UK grid trajectories.</p> <p>Enter Power Purchase Agreements to decouple from the grid and give autonomy over energy costs and carbon emissions.</p> <p>Challenge our framework electricity suppliers to invest in renewable generation across their businesses to drive grid decarbonisation.</p>

Risk	Likelihood	Impact	Risk treatment
<p>There is insufficient capacity on the UK's electricity distribution networks to provide the electricity required to replace fossil fuels with electricity.</p>	<p>Medium</p>	<p>High</p>	<p>Early planning for capacity upgrades for our establishments and strategic engagement with the Distribution Network Operators who provide power to our sites.</p> <p>Continue to deliver energy efficiency upgrades to reduce electricity demand as much as possible.</p> <p>Invest in our own power generation and storage to reduce reliance on the grid.</p> <p>Use of Power Purchase Agreements to invest in renewable generation being developed where capacity is available.</p>
<p>Lack of supply chain capacity to deliver equipment to meet our strategic targets.</p>	<p>High</p>	<p>Medium</p>	<p>Early engagement with suppliers to identify pipeline opportunities and generate confidence.</p> <p>Strategic supply chain agreements to procure equipment/ materials required for implementation.</p> <p>Utilise Prison Industries to re-train prisoners to deliver skills and manufacturing gaps, simultaneously investing in green skills for prisoners and supporting MoJ Circular Economy and Climate Change Adaptation activities.</p>

Risk	Likelihood	Impact	Risk treatment
Additional prison capacity will result in increases in consumption and carbon emissions.	Medium	Low	Design all new buildings and refurbishments to be zero carbon from day 1, with fossil fuels eliminated. Embed low embodied carbon construction in new build projects and focus on refurbishment of existing buildings to restore efficient use.
Net zero interventions are not aligned to long-term Climate Change Adaptation requirements.	Medium	High	Create Links between Net Zero and Climate Change Adaptation Action Plans to ensure alignment.
Suppliers cannot make significant reductions in their emissions to support our Scope 3 carbon targets.	Low	High	Early engagement with our suppliers incorporated as part of our Scope 3 action plan to set out our aspirations clearly.

Follow our sustainable transition

www.gov.uk/guidance/ministry-of-justice-climate-change-and-sustainability



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