

Our response to the UKRI Consultation on the Concordat for Environmental Sustainability of Research and Innovation Practice

September 2023

- 1. Do you think the concordat priorities will help us make practical change to embed environmental sustainability into research and innovation practice? Please provide feedback on improving the priorities and please be as specific as you can with your feedback. (2000 character limit)**

Yes. However, we have some recommendations to refine the priorities to enhance implementation and impact.

The Concordat and UKRI's consultative development process is extremely welcome. UKRI are demonstrating considerable leadership to the research community, and other funders, to support meaningful sustainability action. We value the sector-wide collaboration encouraged by the Concordat.

It is important to minimise institutions' reporting burden whilst ensuring meaningful data is reported. Recognising commitment to the Race to Zero would be one way of doing this. We advise requiring reports to show granular Scope 1 and 2 data to provide a more useful narrative of progress and help identify areas where greater support is needed.

We strongly believe that Scope 3 emissions need to be included in reporting requirements. The current language used (where possible, consider, seek to) will provide loopholes that enable delay or inaction.

We recommend using 'report then refine' principles, signalling minimum scope 3 areas to be reported then using gradual milestones to expand of the breadth of these over time whilst using RAG ratings to show data maturity - we anticipate data quality will improve over time. Many institutions already report in this way. The concordat could give a minimum requirement to those institutions lagging behind. The sector needs to be proactive in communicating that reported emissions may rise as data used matures.

Timeframes need to be more ambitious. 2050 is our absolute backstop for climate action. Sector engagement undertaken through the Climate Commission showed a desire for greater ambition both to incentivise action but also provide 'wiggle room' if targets are missed.

We'd welcome greater clarity around the role of supporters and how audits will work. There's also interest from EAUC and our members in understanding UKRI's plans for centralised reporting and impact assessment of the concordat.

2. We want the concordat to be deliverable. Do you think your organisation could turn the concordat into deliverable next steps? If not, please provide feedback on improving delivery. (2000 character limit)

We recommend the following actions to ensure the Concordat is deliverable and impactful.

Leadership will be pivotal to the Concordat's success at driving change. Alongside strategic alignment and a senior sponsor, we recommend being explicit about the ways organisations should integrate the Concordat's implementation – through risk management, objective setting, audit and internal governance of both sustainability and research professionals.

Procurement is, and will be, a significant challenge. Education organisations need more readily available supplier information to help calculate scope 3 emissions, undertake whole life cycle analysis (e.g. having accurate data about a piece of equipment's electricity usage) and inform end of life planning. The Concordat can be a significant tool to lever change in this area. EAUC is working through the Responsible Procurement Group to exert influence and develop accurate data sources. We appreciate UKRI collaboration in this work. We welcome that value for money assessments can recognise environmental considerations. We also recommend that expectations around whole life costing (at what scale of investment would this be expected etc) be included in the final version of the Concordat.

The travel elements are strong, particularly from a social perspective. We'd like to see this expanded to also enable capacity building with international partners to reduce travel demand and also support a 'just transition'.

Expectations and requirements relating to offsetting should be tightened to ensure signatories have confidence in their approach – what minimum requirements will institutions have to meet? We've done significant work to establish academically robust and commercially viable offsetting for our members through the Carbon Coalition (see www.eauc.org.uk/carbon_coalition) and would welcome collaboration with UKRI to further develop this work in keeping with the Concordat's principles.

3. What do you think we could put in place to make the concordat signatories successful in embedding of environmental sustainability into research and innovation practice? (2000 character limit)

We appreciate UKRI's desire to incentivise action rather than enforcing it. However, to maximise impact, enhance buy-in and enable long term planning, we would like to see anticipatory signals as to long term plans for the Concordat.

Particularly useful would be milestones for when signatories are required to demonstrate progress against their plans; when delivery against the Concordat could become a requirement for funding; the Concordat's revision cycle. This would keep UKRI's encouraging tone but ensure plans turn into action. Further clarity about the audit process would also be welcome.

Concerns relating to competitive disadvantage from participation need to be negated – if delivering research sustainability takes longer, or costs more, this is preferable to delivering

research unsustainably. Alignment of approach with other funders would be welcome so there's consistent messaging to recipients and wider impacts in terms of behavioural and cultural change that would support both research excellence and sustainability.

There are some concerns amongst sustainability professionals that responsibility for delivery of the Concordat will fall to them as an additional reporting burden. Mechanisms are needed to engage and support researchers in the delivery of the Concordat and to foster intra and inter organisational collaboration in a competitive environment.

This could include resourcing local or regional expertise to ensure researchers are well supported in implementing the Concordat and providing guidance for different institutional roles (HR, procurement, leadership, researchers etc) on what their contribution could be. In time, examples of how organisations have taken principles and translated them into practice across different research disciplines and organisation types will be welcome. UKRI could also explore ways of supporting success and scaling of existing progs used by research community e.g. LEAF and MyGreenLabs.

4. Do you have any other comments or feedback on this draft of the concordat?
(1000 character limit)

We want to work with UKRI to support the Concordat's development, roll out and implementation. We can be an enabling organisation as the supporting infrastructure already exists. We can extend our work to better equip and empower the research community, pulling on existing expertise and networks.

We could: engage suppliers through our Responsible Procurement Group; integrate the Concordat into the Sustainability Leadership Scorecard; develop and deliver CPD for researchers and research managers etc. to enhance their capabilities and capacity to engage with the Concordat; deliver the sign-up and maintenance process for signatories and supporters (we deliver the Race to Zero and SDG Accord); and, audit signatories.

There isn't yet a standardised methodology for understanding the impacts of an institution's research activity or a research project. This would help comparability and ease more granular reporting in future. EAUC's experience could also support this work.