



**Response submitted by email to**  
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Mark Allen [Phone 0131 244 5490]

27 September 2013

Mark Allen  
Scotland's Climate Change Adaptation Programme Consultation  
The Climate Change Legislation Team  
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Dear Mark Allen

### **Scottish Climate Change Adaptation Programme – Consultation Response**

Please find below the response from the Environmental Association for Universities and Colleges (EAUC-Scotland) – the sustainability champion for the FHE sector. This letter and attachments incorporate representative views sought from members in the 50 or so Universities and Colleges in Scotland.

#### **Background**

The sector is strongly committed to contributing to a low carbon Scotland. Every Principal or governing body has signed up to the Universities and Colleges Climate Commitment for Scotland [Appendix A]. This commits institutions

- *To harness our academic talents and expand Scotland's ability – through our research capacity, knowledge exchange activity and the provision of skills, modules and courses – to create solutions to the challenges posed by climate change*
- *To demonstrate practical leadership in tackling climate change – by containing growing energy use and costs, protecting estates and buildings and promoting sustainability and social responsibility*
- *To engage our students, staff, alumni and local communities with the challenge of climate change.*

... and *“We will assess the risks to the institution identified in projected climate change scenarios and ensure safeguarding measures are incorporated into our strategic planning, including each estates strategy review (‘adaptation’).”*

Collectively the institutions own and operate extensive publicly-funded buildings assets and are responsible for major estate investment programmes – and can use these to chart a way to a low carbon future. But more than this institutions have a learning and teaching and research role which has not been recognised.

#### **Absence of reference to potential role of FHE in the Draft Adaptation Programme**

Colleagues were surprised at how the tremendously detailed list of actions under way and planned in the Adaptation Programme has been framed almost wholly on land, sea, air, water issues and technical and practical issues of buildings, industries and infrastructure.

There is not sufficient attention in the draft programme to the cultural, organisational and change management issues that need to be tackled to achieve adaptation – and the role of learning and teaching in achieving these. We found no reference to the educational role of the FHE sector in

the Adaptation Programme. There should be explicit reference to Education for Sustainable Development and the new framing of “Learning for Sustainability”.

Through our nearly 500,000 students there is a capacity to address many of the challenges – but there is no mechanism mentioned to engage with them at a formative period in their development as citizens.

We recommend that at the very least the Adaptation Programme should reflect the important role of the sector in establishing a learning environment in which future leaders are trained to handle the challenges of adaptation.

The failure to identify tertiary education as a key enabler of adaptation – and to provide guidance for the sector – is an omission.

Higher Education was not one of the 'core' sectors explicitly flagged as part of the adaptation process. We found it strange that there was practically no reference to universities in any of the documentation – just one or two links to research institutions involved in delivering aspects of the Adaptation Programme.

We could find no explicit reference to either the role – or the potential contribution – of research by the sector in assisting in the adaptation process. Unless we missed it we found no commentary on the value, potential impact and critical need for HE research to be conducted and the opportunities for sector to lead this process.

Surely any Adaptation Programme must be grounded in cutting edge research? This would be in the organisational and cultural issues as much as technical or engineering fields.

There is reference to the Public Sector Duties in some of the documents – and explicit reference to the local authorities' climate change declaration and the associated need for councils to play their part; but there is no clear reference in the programme to explicitly acknowledge the activity of other sectors (including FHE) in this.

Given that the EAUC is named in other government documents as a climate change delivery partner, it is recommended that the Adaptation Programme acknowledge the role of the EAUC and its projects – such as the UCCCfS – and cite it as a partner in the sector's response to this agenda.

We offer to contribute towards a sector response to be incorporated in the final Adaptation Programme published after review of all the responses.

Yours sincerely,



Iain Patton, CEO, EAUC

On behalf of EAUC - Scotland

Copy to David Beards, Scottish Further and Higher Education Funding Council (SFC)  
Angus Currie, convener of Scottish Association for University Directors of Estates (SAUDE)

**Consultation on Draft Scottish Climate Change Adaptation Programme**



**RESPONDENT INFORMATION FORM**

**1. Name / Organisation**

**The Environmental Association for Universities and Colleges (EAUC-Scotland)**

**Title** Mr  Ms  Mrs  Miss  Dr  *Please tick as appropriate*

Surname

**Patton**

Forename

**Iain**

**2. Postal Address**

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**3. Permissions - I am responding as...**

**Individual**  / **Group/Organisation**   
*Please tick as appropriate*

**(a)** Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?  
**Please tick**  **Yes**  **No**

**(b)** Where confidentiality is not requested, we will make your responses available to the public on the following basis  
**Please tick ONE of the following boxes**

Yes, make my response, name and address all available

Yes, make my response available, but not my name and address

Yes, make my response and name available, but not my address

**(c)** The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).  
 Are you content for your **response** to be made available?  
**Please tick**  **Yes**  **No**

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?  
**Please tick as appropriate**  **Yes**  **No**

## 1 **Views on the Overarching Framework**

- 1a To what extent does the overarching framework of the Programme outlined in Figure 1 set an appropriate long term direction for climate change adaptation in Scotland? **Partially ✓**

We found the whole consultation a little difficult to get a handle on. It wasn't immediately clear which of several linked documents across several websites we were meant to be responding to. We found the consultation page unclear with not all of the relevant documentation available in one place (e.g. it was not clear that there is a VERY detailed programme document that accompanies the Executive Summary).

Section 1 at this link <http://www.scotland.gov.uk/Publications/2013/06/2469/0> contains the detailed programme. The Figure on page 5 of this does not sufficiently recognise the change management issues that need to be addressed in the Adaptation Programme.

So far very few people understand what is meant by the concept of adaptation and it does not really appear high on the agenda of organisations in Scotland – both public and private ones. This is not for want of information – for information is not in deficit – a clear steer on what is required is absent.

As an example from our sector the senior management and governing bodies of many Universities and Colleges would be keen to be doing the right thing and contributing to a better understanding of the issues and imperatives of acting now to develop capacity to adapt; but they have no clear concise steer from government on their role in promoting learning and teaching about adaptation or the opportunities for research in informing adaptation priorities.

- 1b Does the overarching framework address the current and predicted impacts to Scotland identified in the UK Climate Change Risk Assessment? **Poorly ✓**

The Climate Ready Society Theme needs to be expanded to more clearly spell out pathways to changed management priorities for public and private organisations in Scotland – and how their leaders and managers will be alerted to what needs done.

## 2 **Views on the Natural Environment Theme**

- 2a Do objectives **N1**, **N2** and **N3** collectively set an appropriate long term direction to ensure that Scotland's natural environment is able to adapt to our changing climate? **Partially ✓**

Concerned at the emphasis on the environment out there rather than the processes and drivers impacting on either changes in the environment or the economic or other forces which shape the environment.

- 2b To what extent will the policies and proposals listed under objective **N1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Partially ✓**

The strategy for awareness-raising should be wider to include information for school curriculum and also programmes for delivery to learners in Further & Higher Education.

Research programmes should provide opportunities for Universities to become involved both as centres of expertise as in the Climate Xchange project and in the calls for pure research in how change can be brought about.

- 2c** To what extent will the policies and proposals listed under objective **N2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Partially** ✓

Suggest providing more guidance for landowners to implement adaptation strategies to mitigate flooding and risks to biodiversity. This guidance needs to be provided at a local level in a way that is meaningful to landowners.

- 2d** To what extent will the policies and proposals listed under objective **N3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Partially** ✓

Guidance on new threats to trees should be made widely available so landowners can spot early signs to halt the spread of disease.

- 2e** Taken together, do the policies and proposals listed under objectives **N1**, **N2** and **N3** address the current and predicted impacts to the natural environment in Scotland identified in the UK Climate Change Risk Assessment? **Partially** ✓

No Comment

### **3 Views on the Infrastructure and Built Environment Theme**

- 3a** Do objectives **B1**, **B2** and **B3** collectively set an appropriate long term direction to ensure that Scotland's buildings and infrastructure networks are able to adapt to our changing climate? **Poorly** ✓

Delays in implementing the Sullivan agenda for low carbon buildings through the Building Standards legislation is an example of how poorly focussed Scottish government is in delivering an integrated approach to both mitigation & adaptation.

Under each of these themes there needs to be much clearer alignment between retrofitting and preparing Scotland's existing built environment AND any new buildings to a future with much scarcer and more expensive fuel supplies – by reducing their design heat loss – and providing low and zero carbon technologies / decentralised energy systems to provide local heat and power solutions.

There needs to be specific guidance about reducing risks of over-heating from projected problems caused by excessive insolation in a warming climate.

We recommend engagement with institutions and organisations at a local level to translate policy into action through engagement with those who understand the local effects and potential solutions.

The Adaptation Programme should suggest how this element may be achieved.

- 3b** To what extent will the policies and proposals listed under objective **B1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Poorly** ✓

Are the priorities mentioned in response to 3a being taught in the schools of engineering and architecture in Scotland's Universities? We think not – as there is no linkage between the aspirations of the programme and the delivery mechanisms for training the

next generation of professionals.

We would welcome design tools for new buildings that sensibly incorporate climate change adaptation. Would be particularly interested in summer cooling strategies that minimise increased energy use.

We are concerned that the plethora of documentation on what needs doing will not get what needs doing done. Can there be some more thought about how to deliver on aspirations / how to achieve the cultural dynamisation which helps leaders in local authorities, in business and in the public sector take the longer term view and invest now in changes needed? It will not be delivered by more long reports but by short straightforward targeted advice which can be incorporated in normal processes of 3- and 5-year planning cycles.

- 3c** To what extent will the policies and proposals listed under objective **B2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Poorly** ✓

Training for built environment professionals in delivering adaptation strategies in practice is not yet sufficiently supported.

Water efficiency strategy should be extended to non-domestic properties.

SEPA should play a role in engaging with those in flood risk areas – to provide insight into how best to achieve solutions for improved mitigation and adaptation to issues like flooding.

Home Energy Efficiency Programme should include measures to encourage the take up of energy efficiency in the private rented sector to reduce student population in fuel poverty.

- 3d** To what extent will the policies and proposals listed under objective **B3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Poorly** ✓

Government-supported agencies are failing to provide appropriate, targeted, practical support e.g. up to date guidance, consultancy support, funding for carbon reduction and climate adaptation measures.

The sector seeks much greater clarity on the role of WRAP, Zero Waste Scotland and Resource Efficient Scotland. The new offering presents a surprising number of different sub-contractor organisations that provide advice on issues like energy, resources and waste. They rarely understand each other's' role and this is confusing even for those of us who try and liaise with them regularly – so must be a continuing nightmare for others who seek guidance from one organisation.

We welcome the publication of SUST advice for designers on embedding climate change adaptation into design but need to widen opportunities for demonstration projects which result in clear guidance on what measures to adopt and how support can be accessed.

- 3e** Taken together, do the policies and proposals listed under objectives **B1**, **B2** and **B3** address the current and predicted impacts to Scotland's buildings and infrastructure networks identified in the UK Climate Change Risk Assessment? **Poorly** ✓

Environmental resilience is a concept that is integrated into only very small number of institutions in our sector. There is frequently reference to adaptation in for example

Climate Action Plans / Carbon Management plans; but little real capacity or management focus in Estates Strategies etc which would genuinely guide decisions down an adaptation route. The momentum of business as usual / so-called sustainable economic growth prevails. Adaptation Programme really needs to tackle this issue head on – the message is not getting through.

#### 4 Views on the Society Theme

- 4a Do objectives **S1**, **S2** and **S3** collectively set an appropriate long term direction to ensure that our communities are able to adapt to our changing climate? **Partially** ✓

There is reference to the Public Sector Duties in some of the documents – and explicit reference to the local authorities' climate change declaration and the associated need for councils to play their part; but there is no clear reference in the Adaptation Programme to explicitly acknowledge the activity of other sectors (including FHE) in this.

Given that the EAUC is named in other government documents as a climate change delivery partner, it is recommended that the Adaptation Programme acknowledge the role of the EAUC and its projects – such as the UCCCfS – and cite it as a partner in the sector's response to this agenda.

The EAUC offers to contribute towards a sector response to be incorporated in the final Adaptation Programme published after review of all the responses.

Engagement with the local community is very important and will continue to be as Scotland experiences more extremes of weather. A number of student and staff-led initiatives have collaborated with local community schemes that help to build capacity and learning about climate change at a local level. These include the Climate Challenge Fund and over last years the Carbon Trust.

EAUC has taken a leading role in establishing a short simple reporting mechanism for member institutions to publicly state how they are progressing with their Climate Action Plan implementation. However because there is not a clear enough steer from ministers and the Funding Council uptake is surprisingly slow.

- 4b To what extent will the policies and proposals listed under objective **S1** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Poorly** ✓

The response is inadequate. There needs to be a much greater understanding why people from all walks of life and all roles in society simply ignore / turn away from the writing on the wall. Partly this has been caused by the economic depression since 2007/8 which has driven the austerity [combined with exhortation about economic growth] policy agenda; and partly because of poor leadership in UK government allowing obfuscation of the issues.

We could find no explicit reference to either the role – or the potential contribution – of research by the FHE sector in assisting in the adaptation process. Unless we missed it we found no commentary on the value, potential impact and critical need for HE research to be conducted and the opportunities for sector to lead this process.

Surely any Adaptation Programme must be grounded in cutting edge research? This would be in the organisational and cultural issues as much as technical or engineering fields. As presently framed this section of the Adaptation Programme fails.

- 4c** To what extent will the policies and proposals listed under objective **S2** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Poorly** ✓

There is not sufficient attention in the draft programme to the cultural, organisational and change management issues that need to be tackled to achieve adaptation – and the role of learning and teaching in achieving these.

We found no reference to the educational role of the FHE sector in the Adaptation Programme. There should be explicit reference to Education for Sustainable Development and the new framing of “Learning for Sustainability”.

Through our nearly 500,000 students there is a capacity to address many of the challenges – but there is no mechanism mentioned to engage with them at a formative period in their development as citizens.

We recommend that at the very least the Adaptation Programme should reflect the important role of the sector in establishing a learning environment in which future leaders are trained to handle the challenges of adaptation.

The failure to identify tertiary education as a key enabler of adaptation – and to provide guidance for the sector – is an omission.

- 4d** To what extent will the policies and proposals listed under objective **S3** provide an appropriate focus for the lifetime of the Programme in order to progress towards the long-term objective? **Partially** ✓

Ambitious fuel poverty targets. Also very difficult to enforce energy efficiency standards in private sector housing, especially if reliant on so-called Green Deal. Absolute need to differentiate the Scottish response to this enormous challenge separate from failed mechanisms proffered by UK government.

Need to allocate resources to grant schemes for targeted building insulation, district heating and other low and zero carbon technology implementation programmes to deliver.

- 4e** Taken together, do the policies and proposals listed under objectives **S1, S2** and **S3** address the current and predicted impacts to Scottish society identified in the UK Climate Change Risk Assessment? **Poorly** ✓

There appears little likelihood of achieving the Adaptation Programme while insufficient priority is accorded to it.

We recommend that at the very least the Adaptation Programme should reflect the important role of the sector in establishing a learning environment in which future leaders are trained to handle the challenges of adaptation.

The failure to identify tertiary education as a key enabler of adaptation – and to provide guidance for the sector – is an omission.

## **5 Views on the Role of Others in Delivering the Programme**

- 5a** What support will public bodies require in meeting their duties to help deliver the programme?

There is reference to the Public Sector Duties in some of the documents – and explicit



reference to the local authorities' climate change declaration and the associated need for councils to play their part; but there is no clear reference in the programme to explicitly acknowledge the activity of other sectors (including FHE) in this.

Given that the EAUC is named in other government documents as a climate change delivery partner, it is recommended that the Adaptation Programme acknowledge the role of the EAUC and its projects – such as the UCCCfS – and cite it as a partner in the sector's response to this agenda.

EAUC Scotland offer to contribute towards a sector response to be incorporated in the final Adaptation Programme published after review of all the responses.

Adaptation should be included in any report templates, specifically the EAUC / UCCCfS template for Universities and Colleges. Sector specific guidance on adaptation methodology would also be useful.

- 5b** Are the arrangements for ensuring public engagement and for involving employers, trade unions and other stakeholders in meeting the programme objectives sufficient? **No**

There needs to be far wider spread engagement strategies using a range of media and not being reliant on bodies such as LAs to spread the message.

## **6 Views on the Environmental Report**

- 6a** To what extent does the environmental report set out an accurate description of the current environmental baseline? **Partially ✓**

The SEA fails to recognise the Process by which change can / needs to occur and the human / cultural / organisational inertia current which is likely to delay / derail reasonable attempts to move forward in absence of very clear leadership – from Scottish government, from local authorities and from the many other public bodies.

This requires a clear steer and recognition of the University and College sector in framing and delivering better understanding of what the solutions can be and how to deliver them.

- 6b** Do you agree with the predicted environmental effects of the draft adaptation programme, set out in the Environmental Report? **No**

Did not find it addressed the real challenge of implementation.

- 6c** Do you agree with the recommendations set out in the Environmental Report? **Yes**

Not really disagreeable ...

- 6d** Do you agree with the proposals for monitoring of the environmental effects of the draft programme set out in the Environmental Report? **No**

Suggest they be beefed up considerably and laid at the door of a better integrated service which genuinely brings together all the quangos to offer the confused and concerned a coherent set of recommendations and guidance on which to take

management decisions in the interests of their organisation and of Scotland.

- 6e** Are you aware of any further environmental information that will help to inform the environmental assessment findings? **No**

Strongly recommend that this question be set as a research project – especially to scope what other countries are doing.

- 6f** Are you aware of other 'reasonable' alternatives to adaptation programme and its content that should be considered as part of the SEA process? **No**

N/A

## **7 Additional Comments**

- 7a** Please provide any additional comments you would like to make on the draft Scottish Climate Change Adaptation Programme.

The EAUC offer to contribute towards an FHE sector response to be incorporated in the final Adaptation Programme published after review of all the responses.

## Appendix A Universities & Colleges Climate Commitment for Scotland

### We recognise the challenge:

- We recognise the scale and speed of climate change, and the likely effect on Scotland's people and places, impacting adversely on our economy, society and environment
- We consider that early action to address the expected changes will create long-term economic, health, social and environmental benefits
- We acknowledge the Scottish Government objective – to reduce emissions by 80% by 2050 – to avert the worst impacts of climate change; and realise we have a role to play in this.

### We welcome the opportunities:

- To harness our academic talents and expand Scotland's ability – through our research capacity, knowledge exchange activity and the provision of skills, modules and courses – to create solutions to the challenges posed by climate change
- To demonstrate practical leadership in tackling climate change – by containing growing energy use and costs, protecting estates and buildings and promoting sustainability and social responsibility
- To engage our students, staff, alumni and local communities with the challenge of climate change.

### Consistent with sustainable development principles, we commit our institution to:

- 1 Support the national Climate Change programmes, reducing our greenhouse gas emissions and implementing adaptation measures for future climate change scenarios
- 2 Allocate time and resources to implementing measures to reduce our overall carbon footprint and engage in the community planning process to deliver low-carbon solutions ('mitigation') by preparing and, within a year, publishing a five-year climate action plan with targets and time scales to achieve a significant reduction in emissions from all our activities, including:
  - energy consumption and source
  - waste reduction, recycling and responsible disposal
  - sustainable estate development
  - sustainable travel planning
  - responsible procurement of goods and services
- 3 Assess the risks to the institution identified in projected climate change scenarios and ensure safeguarding measures are incorporated into our strategic planning, including each estates strategy review ('adaptation')
- 4 Work in partnership with others to implement measures to reduce emissions and engage in neighbourhood mechanisms, particularly through the community planning process
- 5 Collaborate within the sector and with other public and private organisations, both academically and practically, to share good practice on climate change mitigation and adaptation
- 6 Incorporate our work on climate change into established improvement processes and publish results on progress of our response annually, with outcomes achieved / further actions required
- 7 Contribute to the cooperative work, supported by relevant sector bodies, in monitoring progress and promoting best practice.

### Signed

Principal: \_\_\_\_\_ Rector / Chair of Governing Body: \_\_\_\_\_

On behalf of:

Date: 21 January 2009

**Scottish Ministers** welcome this timely and proactive initiative by Scotland's universities and colleges to tackle climate change. Delivering these commitments will lead to positive benefits, as well as raising Scotland's profile as a leading, learning nation, determined to make a positive contribution to one of the greatest global challenges.

Fiona Hyslop, Cabinet Secretary for Education and Lifelong Learning, Jan 2009