

## Response ID ANON-VRHS-FWMP-W

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### Information about you

#### Contact details and publishing consent:

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Publish this response

**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?**

Yes

### PAGE ONE

**Question 1: Do you agree that the powers in the Climate Change (Scotland) Act 2009 should be used to improve climate change reporting by public bodies?**

Yes

**Comments:**

The Environmental Association for Universities and Colleges (EAUC) and our members support the public sector action on sustainable development and climate change activity. This consultation response has been compiled from consultation with the further and higher education sector through various forums.

EAUC works in partnership with the Sustainable Scotland Network (SSN) and agrees that the powers in the Climate Change (Scotland) Act 2009 should be used to improve climate change reporting by public bodies.

EAUC Scotland facilitates the Universities and Colleges Climate Commitment for Scotland (UCCCfS) in which the majority of Further and Higher Educational Institutions (FHEIs) have signed at the Principal level to support climate change reduction activities within their institution. EAUC Scotland manages and monitors the annual reports from the sector to assess progress and updates the Scottish Funding Council with an annual sector report.

**Question 2: Do you agree that standardised reporting will improve the quality and consistency of climate change information reported by public sector major players?**

Yes

**Comments:**

EAUC, and its members, welcome this approach to standardise the format of reporting with other public sector bodies and believes this will improve the consistency, aggregation and analysis of reports while improving data collection methods over time.

**Question 3: Do you agree with the policy subjects and questions included in the proposed climate change reporting form (see Schedule 2 to the draft order)?**

Not Answered

**Comments:**

EAUC agrees the policy subjects and questions are adequate within the reporting template as a standardised format and that a further recommended section will be added to the report format in due course and will address wider activity that is more sector specific. This will align with current UCCCfS reporting which includes activity on embedding sustainability into learning and teaching practices, for example. This is supported by most EAUC members.

Discussion has been had regarding a limited narrative section being added to the template to allow for brief 'executive summary' to highlight key aspects and insights into their specific institution providing context. Introductory narrative in each report should enable organisations to report on any data they have not been able to provide and / or the reason they have not met their emissions reduction targets.

Members have made comment that they would welcome an online format of the reporting template to upload data, with future developments to import data from other external sources i.e. Higher Education Statistics Agency (HESA).

Further suggestions include:

Additional sections on 'biogenic emissions from the combustion of biomass' and 'removals from sequestration'.

3f needs further clarification – does an organisation include on-going projects that started before the reporting year?

5f on procurement would need further guidance.

5g would benefit from guidance and tools which allow public bodies to clearly demonstrate compliance and improvement.

**Question 4: What would you consider to be an appropriate deadline date for the annual submission of climate change public bodies duties reports?**

**Comments:**

Due to the FHEI reporting year ending in July, many members have expressed they would be put at a disadvantage if made to report on the suggested date of 31 October. This would be insufficient time for the aggregation of bills and to fully assess the impact of associated carbon and wider environmental related projects run over a full academic year. While some believe a submission could be made by the end of the year, the general consensus is that they would need until the end of January to submit their report.

The deadline date should be six months from year end of 31 July for FHEIs, and therefore a 31 January deadline.

Currently, the UCCCfS reports have been requested for return in June to allow time for universities to use verified and published HESA data and to align the EAUC Scotland sector progress report submission to SFC in October/November. Universities must submit a wide range of information to HESA on an annual basis.

**Question 5: Based on your current level of climate change/sustainability reporting, are there any additional resource implications associated with the proposed reporting requirement?**

**Comments:**

EAUC members have expressed that the new format will take longer than the existing 2 page UCCCfS progress report format. The first year submission will likely take longer due to the detail involved and understanding what is required from a new format. New information requests will need to be submitted and there is likely to be an increase in staff resource required in the involvement of data collection and governance/senior management involvement.

Over time it is anticipated that this will become more efficient on the proviso that the format or data requests do not keep changing.

The majority of the FHEI sector has been providing yearly reports under UCCCfS requirements for the past few years, provide information to HESA, and also answer annual Freedom of Information requests from the student pressure group People & Planet, covering a wide range of environmental social responsibility questions, so the new reporting should not be a huge shift.

The effects from the regionalisation of the college sector are still being felt and feedback from some of the colleges are that they will need significant help to ensure they are compliant. EAUC intends to continue working closely with any institution that requires additional assistance and with partner organisations such

as SSN and Zero Waste Scotland/Resource Efficient Scotland to ensure adequate support is provided.

**Question 6a: For public sector respondents only: Do you agree with the list of “major players” in Schedule 1 to the draft order?**

Yes

**Comments:**

EAUC members agree with the list of major players listed.

**Question 6b: For public sector respondents only: Would you voluntarily provide additional climate change information if recommended by the Scottish Government?**

Yes

**Comments:**

EAUC members have expressed that they would provide additional information to the Scottish Government if recommended providing it was reasonable and resources were available.

**Question 7: What guidance should be provided for climate change public bodies duties reporting?**

**Comments:**

EAUC agrees the draft guidance document circulated to the Climate Leaders Officers Group (CLOG) provides comprehensive direction for completing the reporting template. EAUC will be creating additional guidance notes, forum discussions and events to support the sector in complying with the duties

EAUC supports a letter from the Scottish Government from the CLOG group to be sent to senior leaders/Principals of institutions (and wider public sector) to inform of the duties, requirements and an indication of the resource needed to ensure compliance.

The reporting requirements should require use of the latest or most temporally appropriate Defra/DECC emission factors, or their successor conversion factors.

Suggest defining a consistent organisational boundary for reporting, referring to the CRC Energy Efficiency Scheme guidance

Guidance should be provided that stipulates reporting using the same measures (tCO<sub>2</sub>e) and points public bodies/major players to a carbon reporting/prediction tool that can be used across the sector.

Guidance should indicate clearly how the addition of data in cases where organisations are not initially able to gather robust data for reporting in early years is to be treated in subsequent years (so that this does not appear incorrectly as an increase). This is often known as a 'revisions policy' and is essential for ensuring comparability of time series data.

**Question 8: How do you think climate change public bodies duties reports should be monitored?**

**Comments:**

EAUC members agreed that this is an important part of the process and welcome assessment and/or feedback on information submitted.

In terms of the FHEIs, EAUC could play a role in the assessment of the reports. UCCCFs reports are currently compiled and assessed at a sector level then jointly for a progress report to the SFC. This could continue with appropriate feedback given to FHEI institutions.

On a larger scale, the SSN or Scottish Government should play a bigger role in assessing the public sector reports. There is some concern that assessment through external bodies and consultants could lead to significant cost implications for the Government and the 150 bodies involved in this process.

**Question 9: What should the consequences be if a major player does not comply with the climate change public bodies duties?**

**Comments:**

EAUC members have suggested it would be effective to publicly outline those that have done well while also outlining those that have not submitted. The sector does not believe that financial penalties would be effective and would discourage the approach.

It must be clearly understood why an organisation has not been able to meet its public bodies duties, and support should be provided by the Scottish Government, where possible, to build the capacity to enable the organisation to comply.

EAUC would like to be notified of non-compliance within the FHEI sector to be able to work directly with those institutions to understand why they didn't submit, what support they require and provide training and potential resource for those who have difficulties to encourage all institutions to progress.

**Question 10: Do you believe climate change public bodies duties reports should be validated prior to submission?**

Yes, internal

**Comments:**

Universities are most likely to use HESA Estates Management Records for the corporate emissions data which will have been through a validation process for submission. EAUC supports an internal review with strong involvement from the senior management and a wider working group for sign off prior to submission. Members have suggested that the occasional external audit would be valid every few years to ensure consistency and the right level and direction of progression.

The process could be streamlined if the Scottish Government provided a standard pro-forma or audit protocol to verify data, for example for peer to peer validation.

**Question 11: Would you be content for your climate change public bodies duties report to be published annually on the Sustainable Scotland Network (SSN) website?**

Not Answered

**Comments:**

EAUC would be happy for the reports to be published on the SSN website. It would also intend to publish (or link to the SSN website) from the EAUC website. EAUC delivers a portal for the FHEI sector called the Sustainability Exchange. EAUC would anticipate any reports and guidance, supporting information would be uploaded here to ensure there is a clear example of leadership from Scottish institutions in a UK and international perspective. The Sustainability Exchange website can be viewed here: [www.sustainabilityexchange.ac.uk/home](http://www.sustainabilityexchange.ac.uk/home)

**Question 12: How much time would your organisation expect to spend preparing a report in accordance with the draft order? (include any external consultancy time)**

**Comments:**

EAUC members have expressed a range of times due to the number of staff to collate and assess data available and the size of their institution. The times ranged from 2 weeks up to 8 weeks. This has been explained through the intricacies of data required, sign off and wider staff engagement for input.

**Question 13: Do you think that the policy proposal presented may impact on businesses, the third sector (voluntary) or any other area of concern?**

**Comments:**

EAUC has no comment on this area.

**Question 14: Do you think that the policy proposal presented may impact on people differently depending on characteristics such as age, disability, gender, race, religion or belief, sexual orientation, gender identity or marriage or civil partnership status? Could the proposals enhance equality or good relations?**

**If so, please comment.:**

EAUC and its members believe there will be little to no impact.

**Consultation Response Please add any consultations views here.**

**Additional comments:**