

# The role of Public Sector Bodies in tackling climate change

## Consultation Response from EAUC-Scotland

**Q1. What additional training, information or guidance do you think Public Sector Bodies need to help them increase their action on climate change?**

### Training

We believe training to be essential within public bodies on three levels:

#### **Senior Level**

EAUC-Scotland agrees that a Climate Solutions qualification for mid-level and senior management will be beneficial, to ensure they have a good understanding of the necessity of swift action. All public bodies, especially those in the High Ambition Climate Network, should be encouraged to have at least one senior staff member who has completed the qualification (or an equivalent) to champion this within the senior team.

We believe it would be beneficial if leaders from Student Associations and external Members of Court also had access to this training.

#### **Sustainability and Carbon Leads**

It is essential that those leading on carbon reduction in public bodies have the skills and knowledge to do so.

Officers in many smaller public sector bodies would benefit from introductory greenhouse gas (GHG) emissions reporting training. EAUC-Scotland ran several 'Introduction to GHG Emissions Reporting' training sessions in 2019 for our smaller institutions to help improve the quality of reporting, which have been very beneficial.

General carbon management, sustainable labs and community engagement training would also be of benefit to many.

This training needs to be offered regularly due to the turnover of staff in many public bodies.

Individual public bodies should also be required to ensure that either their staff have the skills and capacity required to not just report on emissions but also to identify and see through significant carbon reduction projects, or that adequate budget is allocated to bring in external expertise to do so.

The University of Strathclyde has reported that they found recent staff [Carbon Literacy](#) training to be 'transformational' and plan to roll this out to all staff.

## **General**

All staff in public bodies with jobs which have an impact on climate change (most of them!) should be supported to develop a better understanding of the impact of their work on supporting Scotland's climate ambitions. We must recognise not just the direct impact of our public sector bodies in terms of emissions, but also how they influence others' choices – e.g. public bodies are responsible for the teaching of the leaders of tomorrow (and today!), set up systems for householders to dispose of waste, identify and share 'Scotland's culture' with citizens and others, and have many other significant impacts on emissions today and in the future.

For example:

- EAUC-Scotland have successfully piloted a programme at Dundee and Angus College to support college lecturing staff to embed sustainability into their teaching, and support their peers to do the same.
- University of Edinburgh offer Be Sustainable online training to enable staff and students to understand how they can become more sustainable in their work and home life

Training like this should be widely available throughout the public sector.

## **Information**

Information on good practice examples of taking action on a climate emergency need to be shared. EAUC Scotland currently do this within the further and higher education sector, and SSN aim do so within the wider public sector. Having established networks to exchange these examples is vital to ensuring continued progress.

## **Guidance**

As the requirements for Public Sector Reporting changes it is vital that updated guidance, training and one-to-one support is available to support bodies to meet their obligations.

Public sector bodies would benefit from a clarity around, in particular:

- The definition of direct emissions, net zero, climate neutral, carbon positive/negative etc.
- The sources of greenhouse gas (GHG) emissions that should be included in reporting. EAUC-Scotland made recommendations on reporting boundary alignment to the Further & Higher Education (FHE) Sector this year based on the GHG Protocol Corporate Reporting Standard
- Timeframes to communicate targets
- Who reporting should be signed off by and what constitutes good climate governance (EAUC-Scotland have done work with universities and colleges to develop their climate and sustainability governance structures)
- What happens if individual public bodies don't deliver on their carbon targets
- How to align mitigation & adaptation so new infrastructure takes consideration of both aspects
- How to align with the Sustainable Development Goals (SDGs) reporting process

## **Q2. What are your views on the proposed structure for the High Ambition Climate Network of Chief Executives and Elected Members?**

We support the establishment of a High Ambition Climate Network (HACN) of Chief Executives and Elected Members to galvanise action from public sector leaders and to facilitate and deliver large-scale collaboration. However, we believe that the HACN will require a delivery group and that the proposed bi-annual meetings will be insufficient.

We think the HACN would have most impact if it acted as a sounding board and forum for assisting Ministers in targeting particular areas for action, for sharing best practice and providing a 'critical friend' role for developing policies and programmes, analogous to the role the 2020 climate group undertook for a number of years.

We are concerned that the HACN will engage only a small portion of the public sector, leaving those who are not the highest performing behind. In addition, public sector leaders do not always have the expertise to fully understand the challenge and potential solutions. The barriers to reaching net zero will be most apparent to the practitioners tasked with its implementation, and it is vital that practitioners have a way to discuss and identify shared challenges for discussion by the HACN.

These high-level-only solutions cannot replace the essential officer level guidance, support & networking that the Sustainable Scotland Network currently provides between the experts on climate action between Scotland's public bodies. Targets can be created by a group of leaders, but effective reduction action plans cannot.

The National Forum on Climate Change is a welcome structure, but public sector bodies will need a forum to exchange knowledge about their internal plans for reaching net zero in addition to a forum for discussion about collective action to reduce the carbon impact of Scotland as a whole.

## **Q3. Do you agree that Public Sector Bodies should be required to set targets for when they will achieve zero direct emissions, and for reduced indirect emissions?**

Yes.

Indirect emissions reduction targets are important to ensure bodies consider how they can reduce consumption in different areas, rather than waiting for sources to reach zero emissions. It is important that these targets can be amended as more information becomes available, as outlined.

Interim targets may also be important to request, in order to monitor progress towards the ultimate zero target. Setting targets at a minimum of five year intervals would align with past target setting processes in the further and higher education sector.

To support target setting for indirect emissions, it is important that bodies are given information from national decarbonisation targets, such as around grid electricity and when all new builds will be required to be net zero, as these will affect their own activities. This information will need to be easily interpretable from the Climate Change Plan.

Clarity will also be required on whether bodies can have different targets for different emissions sources or are required to create one high level indirect emissions target. More focused targets should perhaps be still encouraged internally, as they are much easier for staff and the general public to relate too.

Support in terms of shared platforms and methodologies across the public sector for calculating scope 3 emissions would be extremely valuable.

Target setting for some scope 3 emissions such as from procurement would be extremely difficult due to current data issues and need to rely on supplier cooperation and input, however target setting for business travel is most likely feasible across public sector organisations due to access to data. Recognition of these differences is important.

**Q4. Do you agree that Public Sector Bodies should report annually on how they use their resources to contribute to reducing emissions?**

Yes, as this will help to ensure that climate change is embedded as a priority across the public sector.

Guidance may be required on how bodies are expected to provide insight into how they are reducing their emissions through decisions made on wider expenditure.

Carbon budgets could also be considered as a mechanism to ensure that all departments contribute to organisational targets.

Major capital investment projects should additionally be required to report on this at the approval stage.

**Q5. Do you agree that the details of what Public Sector Bodies are required to report on should be set out in statutory guidance instead of on the face of secondary legislation (otherwise known as an Order)?**

Yes

Updates to the guidance need to be discussed with a representative group of public sector bodies – COSLA cannot represent the whole of the public sector in the way SSN currently does – and should be made allowing a realistic timeframe for public bodies to respond to the updates.

**Q6. Do you agree to the proposed changes to the list of Public Sector Bodies that are required to annually report their emissions?**

Yes

There needs to be a clear, regular process for the amendment of the list of Public Bodies required to report.

**Q7. Do you agree with our proposals for amending the reporting requirements as set out above?**

Partially

EAUC-Scotland broadly agree with the proposed simplification of the reporting requirements.

However:

- We believe that ‘metrics used by the body’ are essential for developing performance metrics that enable impactful analysis within sectors and between reporting periods (especially where there has been a material change to the size of the institution), and these should remain included and be specified for each sector
- We believe that good governance arrangements for climate change are vital for institutions to take action, so if this is to be removed then bodies should be required to include this information on their own websites
- We believe the targets section should include interim targets and, going forward, a short narrative update on progress against the target
- We are also concerned that procurement is being removed as it represents the largest source of emissions for the public sector and is the area in which we can achieve the greatest emissions reductions. We understand that the questions as they stand do not provide meaningful data, but as procurement emissions become better understood it is vital that they are included within public bodies reporting. Currently all further and higher education institutions receive data annually from the HESCET report on emissions based on their spend in different categories, and although this is a simplified way of calculating procurement emissions it would be better for them to acknowledge, report, and take responsibility for them at this point rather than waiting until more robust calculations are available. If this information is not requested then this will take much longer to happen. The questions should be updated and become more numerical rather than be removed

**Q8. Is there anything else you think should be added to the reporting duties, or anything else you think should be removed?**

The Wider Influence (optional) section is not mentioned here. Although cumbersome in its current format, it is important that all public bodies consider the wider impact of their activities on society in terms of influencing climate change and sustainability (e.g. teaching, engagement etc.). If the reporting of activity in this area has to be removed then we believe that bodies should be required to publish a socio-economic impact assessment or policy outlining their positive influence on climate change and sustainability in Scotland, beyond their own emissions, on their website.

**Q9. Do you agree that Public Sector Bodies should each make their own report on emissions reductions publicly available?**

Yes

We welcome the proposal of prominent, transparent and publicly accessible reports.

However, it is also vitally important that reports continue to be held in a central location online so interested parties can easily view the reports from different bodies.

In addition, either key data has to be submitted through an online portal to be compiled, or someone needs to compile the data from individual reports in a timely fashion, with the full data set and a brief analysis of progress made available to enable understanding of progress across the public sector, as SSN have been doing up to this point. EAUC-Scotland currently use the collated data to provide an enhanced understanding of carbon reduction progress and plans in the further and higher education sector to inform our own activities and those of the Scottish Funding Council. It would be inefficient for the data collation to be undertaken by several organisations independently, and it would result in a large reduction in public understanding of the progress that is being made if the data was not compiled and reported as a whole.

**Other Comments**

The role of the Sustainable Scotland Network (SSN) in supporting individual public sector organisations, and the practitioners within them, to make progress on carbon emissions reductions has been greatly underestimated in the development of these proposals.

Beyond their reporting function, the SSN supports public sector bodies by:

- Identifying gaps in public sector sustainability knowledge or progress and providing knowledge sharing and skills development events in response
- Sharing examples of good practice (in governance and on the ground) to inspire those working in sustainability in public sector bodies and push the sector forward
- Providing a network of peers where individual practitioners working on sustainability (who often feel that many of the systems within their own organisation are working against them and sustainability progress) can be supported and learn from each other's successes
- Being a voice for sustainability in the public sector from the practitioner level

None of these functions will be filled by the structures outlined in this consultation.

We believe the removal of funding for these activities from the SSN is a backward step and will not help Scotland respond to the climate emergency.