



The Scottish Government Consultation: [The role of Public Sector Bodies in tackling climate change](#)

Submitted March 2019

Consultation Analysis available: [The role of public sector bodies in tackling climate change: consultation analysis](#)

Consultation Questions

Part 1: Information and collaboration

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

Creative Scotland would welcome guidance around setting targets and a timeframe for achieving them, along with appropriate indicators and measurements. It would also be helpful as proposed to undertake and make available nationally a clear interpretation of what data will be required from public bodies. Further, guidance would be helpful regarding how the very ambitious targets shape broader policy, for example, around the conflict between our responsibility to promote Scottish culture abroad and the emissions caused by international travel. The establishment of common reporting formats and metrics will be essential, so that public bodies are able to assess their emissions reductions in a comparable way. Having this consistency would allow for a longitudinal understanding and year on year comparison of the success or otherwise of carbon reduction across all bodies.

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

We feel that the proposed structure could be improved upon. We are concerned that establishing a High Ambition network could lead to a two tier system for public bodies, where those bodies which need more support, namely those which are not setting high ambitions, end up receiving less. Instead, we would recommend the creation of a network which provides a forum for the sharing of leading practice, information and learning. We do recognise that there is a huge variety within the public bodies, so it may be useful to create sub-groups of similar bodies which can collaborate and share information specific to their needs.

Part 2: Targets and reporting

3. 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

Please explain your answer.

Clearly, public bodies must achieve net zero emission by 2045. Key to achieving this very challenging aim will be to set interim term targets which build sufficiently towards net-zero within 25 years: future success will depend critically on the next few years. We understand that the term 'indirect emissions' includes the emissions of organisations and projects which we fund, which greatly exceed our own direct emissions. Achieving the net zero target would then be more complex and difficult to monitor.

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

Yes

Please explain your answer.

This will help the Scottish Government to understand how bodies are using their resources and to advise how to use their resources more effectively to deliver targets. The urgency and necessity of these emissions reductions will necessarily impact on public bodies' policies and priorities, and how their resources are targeted. For example, as already noted, Creative Scotland has responsibility for promoting Scottish culture internationally, yet air travel is a major source of emissions associated with cultural events.

5. 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

Please explain your answer.

With something as fast moving as climate change, reporting requirements may change in the future. In addition, there is variation in the public bodies which are required to deliver these targets, therefore, a mechanism that will allow the framework to be flexible is to be welcomed.

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

Yes

If you answered no, please specify which aspect of the proposal you disagree with and why.

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

Yes

If you answered no, please specify which aspect of the proposal you disagree with.

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

We understand that the procurement section will be removed as a reporting requirement. Whilst we support the ambition to use the £11 billion of annual procurement in contributing to the green and

circular economies, it may be useful to revise the procurement section to gather more useful data to better understand how it might contribute to decarbonisation.

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

Yes

Please explain your answer.

Making reports (in addition to the aggregated and interpreted data by Scottish Government) publicly available will allow public bodies to demonstrate their accountability to the people of Scotland. In addition, it will make progress and actions clear and transparent to a wider public. Finally, it will allow each public body to demonstrate their performance to their stakeholders.

Other comments

Please use this space to make any further comments on the role of the public sector in tackling climate change.

We very much welcome the opportunity to respond to this consultation. We recognise the urgency of climate change and are working to reduce our direct and indirect emissions, and to act sustainably. We note the important role that public bodies can play in Scotland's efforts to achieve net zero emissions by 2045. Although climate emergency has been declared, the urgency of the situation is perhaps not felt as acutely as it should. Public bodies will be key in changing perceptions of this emergency and it is right that they should show leadership in this area.