

BIG CLIMATE CONVERSATION

The role of Public Sector Bodies in tackling climate change

A Consultation

11 September 2019



Scottish Government
Riaghaltas na h-Alba
gov.scot

Ministerial Foreword

There is a Global Climate Emergency and everyone across Scotland needs to be part of the solution.

The UK Committee on Climate Change has provided the evidence that Scotland can become a net-zero nation by 2045, and there is a strong consensus – across political parties, generations, and sectors – that we can and should make a step-change in our activity. We have already almost halved greenhouse gas emissions since 1990, while growing the economy, increasing employment and productivity, and we are recognised internationally as climate leaders. That puts us in a strong position to increase the pace of action, and end our contribution to climate change, definitively, within a generation.

The challenges ahead of us should not be underestimated, and we need a whole-Scotland approach to succeed. Scotland's public sector has played a key role in our emissions reductions so far and I applaud the effort and successes that have been made to date. I also recognise, and commend, the ambition of those bodies such as Edinburgh, Glasgow, Highlands and Moray Councils who have committed to leading the way. We will all benefit from their ambition.

The transition to a net-zero society is an investment in our present and our future. It will require collective action across our Public Sector Bodies, along with meaningful and open conversations between our communities, businesses and public sector organisations. The transition brings both opportunities and challenges and I believe that constructive dialogue, underpinned by meaningful action, should be central to our approach.

I look forward to hearing your views on how we can work together to continue to strengthen our approach to decarbonising and improving the lives of the people who live here. I thank you in advance for your response.



A handwritten signature in black ink that reads "R. Cunningham". The signature is fluid and cursive.

ROSEANNA CUNNINGHAM MSP
Cabinet Secretary for Environment,
Climate Change and Land Reform

BIG CLIMATE CONVERSATION: Role of the Public Sector in decarbonising Scotland

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CONSULTATION PROCESS

Responding to this consultation

We are inviting responses to this consultation by 4 December 2019.

Please respond to this consultation using the Scottish Government's consultation hub, Citizen Space (<http://consult.gov.scot>). Access and respond to this consultation online at <https://consult.gov.scot/energy-and-climate-change-directorate/role-of-public-sector-in-decarbonising>. You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of 4 December 2019.

If you are unable to respond using our consultation hub, please complete the Respondent Information Form in Annex C and return it, together with your response, to:

The role of Public Sector Bodies in tackling climate change: A Consultation
Business and Public Sector Engagement Team, 3F South
Scottish Government
Victoria Quay
Edinburgh
EH6 6QQ

Handling your response

If you respond using the consultation hub (<http://consult.scotland.gov.uk/>), you will be directed to the "About You" page before submitting your response.

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential and treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in Annex C of this document.

To find out how we handle your personal data, please see our privacy policy: <https://beta.gov.scot/privacy/>.

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at <http://consult.gov.scot>. If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with other available evidence. An analysis report will be made available before the end of the year.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above or to:

climate.change@gov.scot

Scottish Government consultation process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.gov.scot>. Each consultation details the issue under consideration and explains how you can give us your views, either online, by email or by post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant Public Sector Body.

Introduction

At the heart of our action on climate change is the wellbeing of Scotland's people and places. Tackling climate change and ensuring we have a thriving and healthy environment is critical to our collective wellbeing, and central to the ambitions and responsibilities set out in Scotland's National Performance Framework.

Public Sector Bodies are legally required to reduce greenhouse gas emissions and support Scotland's adaptation to a changing climate^a. Scottish Ministers, in turn, are legally required to provide guidance to Public Sector Bodies to help them with this^b. The first part of this consultation is about how information is provided and shared and how Public Sector Bodies collaborate with each other and the rest of Scotland. Views are sought on the training and guidance available to public sector leaders and proposals for a High Ambition Climate Network of Public Sector Bodies.

Public Sector Bodies are also legally required to report annually on their greenhouse gas emissions and what they are doing to help adapt to a changing climate^c. The second part of this consultation is about improving the reporting arrangements to simultaneously reduce the administrative burden on Public Sector Bodies and drive action. Views are sought on whether Public Sector Bodies should set targets for themselves to achieve zero greenhouse gas emissions and on other changes to the reporting duties.

This consultation is focussed purely on Scottish Public Sector Bodies – that is, the public bodies in Scotland for which either the Scottish Government or Scottish Parliament is responsible. This includes local authorities, the police, fire and health services, transport partnerships, universities and colleges as well as bodies such as Scottish Water, the National Galleries and Museums and VisitScotland. UK Government Public Sector Bodies operating in Scotland, such as HMRC and DWP, are beyond the scope of this consultation.

We want to hear from Public Sector Bodies, but we also want to hear from other organisations and individuals about what Public Sector Bodies should be doing to tackle climate change.

^a Section 44 of the Climate Change (Scotland) Act 2009

^b Section 45

^c Section 46

Part 1: Information and collaboration

Despite challenging fiscal circumstances, Scotland has already almost halved greenhouse gas emissions since 1990, while simultaneously growing the economy and increasing employment and productivity. We now need to increase our efforts and the pace of change, while maintaining the focus on reducing emissions in a way that supports inclusive economic growth.

For Public Sector Bodies to play their full role in securing a just transition to a net-zero Scotland, leaders of Public Sector Bodies need to have the knowledge and information to make the right decisions, and the right structures need to be in place to support collaboration across the public sector and beyond.

Information and training for Public Sector Bodies

The Scottish Government is funding the Royal Scottish Geographical Society to develop a “Climate Solutions” qualification. We expect this to launch early in 2020, helping organisations embed climate change action at the level where it can achieve the most significant impact. It will be a short training course for middle and senior managers, designed to impart a strong background knowledge of climate issues and an opportunity to explore solutions. The focus will be on identifying and delivering on specific actions and commitments, both organisational and personal, to reduce carbon emissions.

In terms of adapting to climate change, the following guidance was published recently to support organisations at different stages of developing adaptation strategies and action plans: [Scotland Adapts: A Capability Framework For a Climate Ready Public Sector](#)

In addition, in 2011 the Scottish Government produced [Public Bodies Climate Change Duties: putting them into practice](#). The aim of this guidance was to assist Public Sector Bodies in addressing climate change action as a key strategic issue and in mainstreaming it alongside other corporate priorities. A number of aspects of this document now need to be updated and we welcome your views on what would be most helpful.

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

Collaboration across Public Sector Bodies

Our Public Sector Bodies are connected at a strategic level through the Scottish Leaders Forum, which provides a space for collective leadership and action across a range of priorities. At a delivery level, Chief Executives from Scotland's executive agencies are connected through the Public Bodies Delivery Group.

At an officer level, there is both the Scottish Energy Officer Network and the Sustainable Scotland Network (SSN). The Scottish Energy Officer Network is for officers working in, or who have an interest in, public sector energy management. Its goal is to share best practice and disseminate information. The Sustainable Scotland Network is for public sector professionals working on sustainable development and climate change.

The Global Climate Emergency means that we need to look afresh at how we work, to ensure our spending decisions and procedures support the required step-change in activity. As part of these considerations, Scottish Government financial support for the SSN Secretariat will cease when the current contract ends on March 31 2020. Instead, we will put two structures in place:

Firstly, we will ensure there is support for Public Sector Bodies to complete their mandatory reporting duties. We will procure a contract for the support to be provided in time for the 2020 reporting round.

Secondly, we will establish a High Ambition Climate Network of Chief Executives and Elected Members in those Public Sector Bodies who are committed to leading the way to a net-zero Scotland.

The network will be focussed on making strategic connections across the most ambitious Public Sector Bodies, maximising the economic and social opportunities of reducing emissions, and tackling the challenges of emissions reduction in a way that makes action easier for all public bodies, communities and businesses.

We propose that the core of the Network should be comprised of up to 15 of the most ambitious Public Sector Bodies and meet twice a year. The meetings will be chaired by the Cabinet Secretary for Environment, Climate Change and Land Reform, and supported by a Senior Officials Group from across the bodies involved.

It is important that all Public Sector Bodies benefit from the network, so in addition to a core membership that meets regularly, we will support an electronic network of Chief Executives and Elected Members from all Public Sector Bodies. The electronic forum will be a place where lessons learned, opportunities and ideas can be shared and developed collaboratively.

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

National Forum on Climate Change

Our independent statutory advisors, The UK Committee on Climate Change, have advised that achieving net-zero emissions will require “*extensive changes across the economy*” and “*a fundamental change from the current piecemeal approach that focuses on specific actions in some sectors to an explicitly economy wide approach*”^a.

We recognise that the progress made to halve emissions from Scotland since 1990 has been achieved with little impact on most people. The next phase will require much more noticeable changes, tougher decisions and greater opportunities. Constructive dialogue must be the central pillar of our approach.

We will create a National Forum on Climate Change that brings together government, Public Sector Bodies, the private sector, third sector organisations and the wider public. We will be working with stakeholders to explore how the National Forum can best encourage collective, informed deliberation on ideas for systemic and wide-ranging climate action.

^a <https://www.theccc.org.uk/publication/net-zero-the-uks-contribution-to-stopping-global-warming/>

Part 2: Targets and reporting

The [Climate Change \(Duties of Public Bodies: Reporting Requirements\) \(Scotland\) Order 2015](#) requires Public Sector Bodies to publish annual climate change reports. This was intended to demonstrate compliance with Public Sector Bodies' climate change duties, to engage leaders and encourage action. The Order is reproduced in Annex A, and the list of Bodies required to report is in Annex B.

The Scottish Government established a short-life, collaborative working group to carry out a preliminary review of the reporting duties and associated processes. The group consisted of representatives from 16 organisations including the Sustainable Scotland Network (SSN), COSLA, local authorities, educational institutions, NHS and environmental NGOs. Its main focus was to look for opportunities to increase the value of the reporting, while decreasing administrative burden.

The group reviewed the structure and content of the current Order, the associated data collection system, the listed bodies and the way collected data are communicated. The group also revisited the purpose of mandatory reporting and agreed a set of criteria which would be used for evaluating the effectiveness of the reporting system.

The group concluded that mandatory reporting should:

- drive climate change performance within individual organisations;
- drive climate change action across the public sector as a whole;
- inform the ongoing development of policy, by linking it with national policy frameworks (such as the Climate Change Plan and Scottish Climate Change Adaptation Programme).

The group also agreed that reporting should be:

- Efficient (designed to facilitate impactful analysis and aligned with other reporting mechanisms to avoid duplication, where possible);
- Effective (informing leadership, action and decision making; enabling progress tracking; linking to national and local policy; shows wider impact and encourages collaborative work);
- Professional and trusted (compliant with reporting standards; transparent; providing data that is easy to understand, communicate and access);
- Adaptable (designed to evolve, as required; proportionate).

The key findings of the review were that:

- a) Some parts of the reporting duties are too rigid, tied very closely to objectives, policies, priorities and programmes and therefore liable to become out of date over time.
- b) In contrast, other parts are too open, such as part 2 (governance, management and strategy), generating challenges for data collection and consistency.

- c) The “procurement” sections currently provide little meaningful data and do not effectively monitor how procurement policies are contributing to emissions reduction.

In light of the review and the Global Climate Emergency, the Scottish Government considers that the Public Sector Reporting Duties should be amended to:

1. require all Public Sector Bodies to state the year by which they will cease to emit any direct greenhouse gases and their targets for reducing indirect emissions;
2. report on how Public Sector Bodies will align their spending plans with these targets;
3. remove the detailed specification of all data fields from the Order itself, replacing this with a) high-level reporting requirements and b) a requirement that the Scottish Government produce detailed specification of every data field in a separate guidance document;
4. update the list of Bodies that must report;
5. remove the requirement to report information that is not directly pertinent to ending Scotland’s contribution to climate change;
6. require every Public Sector Body to make their report publicly accessible, in a way that empowers stakeholders and members of the public to view and understand it, in addition to providing the report to the Scottish Government.

These proposals are explained more fully below. The changes proposed would come into effect in 2022.

In addition, and not requiring any changes to the secondary legislation, the Scottish Government will provide a publicly accessible analysis of all Public Sector Bodies reports that allows stakeholders and members of the public to readily understand the overall level of progress and ambition in tackling climate change across Public Sector Bodies.

1.1 Public Sector Bodies to set their own emission reduction targets

Our climate change targets mean that Scotland as a whole will achieve net-zero emissions of all greenhouse gases by 2045 at the latest. Achieving net-zero emissions is a nation-wide endeavour. The CCC scenario for net-zero has all sectors at zero, or virtually zero, emissions except for agriculture, some parts of industry, and international aviation[1]. Remaining emissions from these sectors will need to be balanced, or outweighed, by negative emissions solutions such as tree planting and bioenergy with carbon capture and storage. The balance between remaining emissions and negative emissions needs to be across the whole economy, and the Scottish Government is committed to achieving this without the use of international offset credits.

Currently there is no requirement for Public Sector Bodies to report on the year by which they intend to achieve zero greenhouse gas emissions, either

from their own estate and operations (their direct emissions) or, in the case of Local Authorities, for their Local Authority area.

A lot of what individual Public Sector Bodies will be able to achieve in terms of reducing their emissions will be dependent on what progress is made in the rest of society. Within 6 months of the Climate Change (Emissions Reduction Targets) (Scotland) Bill receiving Royal Assent we will update the Climate Change Plan, setting out the pathway to decarbonisation for Scotland as a whole.

Following the update to the Climate Change Plan, we propose that in their future annual reports, all Public Sector Bodies report the date by which they intend to achieve zero direct emissions – those are the emissions that the bodies are directly responsible for. Recognising that indirect emissions are not entirely within Public Sector Bodies' control, we recommend that each organisation sets their own targets, with dates, for the extent to which they aim to use their influence to reduce those.

The targets that Public Sector Bodies set themselves will not be legislative targets, and the targets they set themselves in the first year of reporting may need to be amended in subsequent years reporting when further information becomes available, as progress in other parts of society become apparent for example, or to align with future Climate Change Plans

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 / no / don't know Please explain your answer.

1.2 Public Sector Bodies to report on how they use their resources to contribute to reducing emissions

The Scottish Parliament have debated whether Scottish Ministers should be required to ensure that all Public Sector Bodies will use their resources in a way that will contribute to meeting or exceeding Scotland's emissions reduction targets, prior to approving resources^a.

We propose that a proportionate way for Public Sector Bodies to demonstrate that they are using their resources to contribute to reducing emissions is to require them report on how they do this, as part of their annual reporting.

^a Amendment 112 lodged by Mark Ruskell, debated by the Environment, Climate Change and Land Reform Committee on 18 June 2019.
<http://www.parliament.scot/parliamentarybusiness/report.aspx?r=12197>

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

Yes / no / don't know Please explain your answer.

1.3 Specify detailed reporting requirements in Statutory Guidance

The current reporting template is prescribed in detail by the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015 and secondary legislation is required to make any changes. The review process highlighted that a degree of flexibility in specifying the content of reports would be preferable.

We propose to amend the Order so that it specifies high-level reporting requirements and refers to statutory guidance for the detail of what Public Sector Bodies must report on. Any future changes to the statutory guidance would be made in consultation with COSLA and key Public Sector Bodies. This would reduce the time and resources required to implement changes and would allow the reporting duties to evolve more flexibly in line with national policies and strategies.

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 / no / don't know Please explain your answer.

1.4 Update the list of Public Sector Bodies required to report

The reporting duties apply to Public Sector Bodies listed in schedule 1 of the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015 (See Annex B).

We propose to make the following amendments to the listed bodies:

Remove:

- The chief constable of Police Service of Scotland (given that this is now included within the Scottish Police Authority)
- The Registrar General of Births, Deaths and Marriages for Scotland (given that this is now included within the National Records of Scotland)
- Integration Joint Boards (IJBs), as they do not own an estate and do not produce emissions. Since they do not have operational control of the services provided by their NHS and local government partners, no emissions data has been reported by IJBs to date.

Amend:

- The Common Services Agency for Scotland, which is now known as 'NHS National Services Scotland'
- The Scottish Sports Council, which is now 'Sportscotland'

- Social Care and Social Work Improvement Scotland is now ‘The Care Inspectorate’
- The Scottish Further and Higher Education Funding Council, which is now ‘The Scottish Funding Council’

Add:

- South of Scotland Enterprise (due to be established in 2020)
- Ferries owned by Scottish Government (Caledonian Maritime Assets Ltd and David MacBrayne Ltd)
- Scottish Prison Service
- Scottish Public Pensions Agency
- Skills Development Scotland
- Student Awards Agency for Scotland
- Social Security Scotland
- Scottish Forestry
- Forestry and Land Scotland

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

Yes / no / don’t know If you answered no, please specify which aspect of the proposal you disagree with and why.

1.5 Emphasise delivery in the reporting requirements

In light of Scotland’s increased ambition, we want to ensure reports focus on delivery. The review process noted that, in order for the reporting to drive action, it should be as efficient and effective as possible. We are proposing a range of amendments to ensure that those criteria are met and to provide more clarity and simplification, where possible.

In Part 1 (Profile) we propose to remove 1d (Metrics used by the Body) and 1g (Context – a summary of the Body’s nature and functions that are relevant to climate change).

We propose removing Part 2 (governance and management), which asks questions about governance arrangements, strategy, how climate change action is managed, priorities, use of the Climate Change Assessment Tool, and for other supporting information.

In Part 3 (emissions, targets and projects) we propose to:

- Keep questions 3(a)-(c), which address overall emissions, sources and details of generation/consumption/use of renewable energy
- Amend question 3(d), which asks about targets. This will reflect our proposal in Section 4.1 (above) to require Public Sector Bodies to commit to a net-zero emissions date and would address:
 - The organisation’s target date for achieving zero direct emissions and

- The organisation's reduction targets, including dates, for indirect emissions.
- Remove questions 3(e)-(k), which ask about carbon savings, carbon reduction projects, estimated emissions and cost savings for the year ahead.

We will update Part 4 (Adaptation) of the report. Our approach will seek information on progress with adaptation policies and strategies, focusing on outcomes, challenges and opportunities, rather than the specific objectives outlined in the existing order.

The procurement section of the climate change reporting duties (Part 5) has not resulted in meaningful information being gathered, so we propose to stop collecting data in this way. Instead, we will explore how mandatory climate change reporting can best align with our Programme for Government 2019-20 commitment to mobilise the £11bn of annual procurement to support our climate emergency response, including consulting on legislation to require public bodies to set out how they will meet our climate change and circular economy obligations.

We propose to remove Part 6 (Validation) of the report.

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

Yes / no / don't know If you answered no, please specify which aspect of the proposal you disagree with.

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

1.6 Public Sector Bodies to make their reports publicly accessible

Currently, Public Sector Bodies are required to submit their reports to the Scottish Government. The Scottish Government then makes the reports available to the public in the form in which they were provided.

The review group agreed that reports should: drive climate change performance within individual organisations; drive climate change action across the public sector as a whole; and inform the ongoing development of policy. The group considered that there is currently a lack of clarity about the purpose of the data and how it is being used.

The Scottish Government considers that each public sector body should be required by the legislation to make their reports publicly available and do so in a way that is accessible, prominent and meaningful, so that local stakeholders can use the reports to hold the public sector body to account.

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

Yes / no / don't know Please explain your answer.

The Scottish Government also considers that analysis of the reports needs to be improved. The analysis should be useful to Public Sector Bodies, and transparent and informative to others. We will ensure that improvements to analysis and communication are made following changes to the Reporting Duties.

Other comments

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

Annex A – The Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015

SCOTTISH STATUTORY INSTRUMENTS

2015 No. 347

CLIMATE CHANGE

The Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015

<i>Made</i>	- - - -	<i>6th October 2015</i>
<i>Laid before the Scottish Parliament</i>		<i>8th October 2015</i>
<i>Coming into force</i>	- -	<i>23rd November 2015</i>

The Scottish Ministers make the following Order in exercise of the powers conferred by sections 46(1) and 96(2)(a) of the Climate Change (Scotland) Act 2009^(a) and all other powers enabling them to do so.

Citation and commencement

1. This Order may be cited as the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015 and comes into force on 23rd November 2015.

Interpretation

2. In this Order—

“the Act” means the Climate Change (Scotland) Act 2009;

“listed body” means any body which, any other person who, or the holder of any office which is listed in Schedule 1^(b);

“report year” means the year for which a report is to be prepared under article 3(1);

“year” means a period of 12 months ending with 31st March; and

“year ahead” (in Schedule 2) means the year which follows the report year.

^(a) 2009 asp 12; in section 46(1) “relevant public body” has the meaning given by section 44(5) of that Act (“the Act”). It refers to a Scottish public body (within the meaning of section 3(1)(a) of the Freedom of Information (Scotland) Act 2002 (asp 13)) which has climate change duties under section 44(1) or by virtue of section 44(3) of the Act.

^(b) Each listed body is a Scottish public authority within the meaning of section 3(1)(a) of the Freedom of Information (Scotland) Act 2002. By virtue of section 44 of the Climate Change (Scotland) Act 2009 (“the Act”) each listed body has climate change duties. Each body is, accordingly, a “relevant public body” for the purposes of Part 4 of the Act.

Reports

3.—(1) For each year, a listed body must prepare a report on compliance with its climate change duties.

(2) The listed body must send the report to the Scottish Ministers within a period of 8 months from the end of the report year.

Form and content

4.—(1) Each report must be in the form set out in Schedule 2.

(2) Each report must contain the information specified in the form set out in Schedule 2.

(3) The report may be sent to the Scottish Ministers in electronic form.

St Andrew's House,
Edinburgh
6th October 2015

AILEEN McLEOD
Authorised to sign by the Scottish Ministers

SCHEDULE 1

LISTED BODIES

Article 2

Ministers, The Parliament

The Scottish Ministers

The Scottish Parliamentary Corporate Body

Holders of offices in the Scottish Administration which are non-ministerial offices

Food Standards Scotland

The Keeper of the Records of Scotland

The Keeper of the Registers of Scotland

The Office of the Scottish Charity Regulator

The Registrar General of Births, Deaths and Marriages for Scotland

Revenue Scotland

The Scottish Courts and Tribunals Service

The Scottish Housing Regulator

Local government

A council constituted by section 2 of the Local Government etc. (Scotland) Act 1994^(a)

A Transport Partnership created under the Transport (Scotland) Act 2005^(b)

National health service

The Common Services Agency for the Scottish Health Service

A Health Board constituted under section 2 of the National Health Service (Scotland) Act 1978^(c)

The National Waiting Times Centre Board

NHS Education for Scotland

The Scottish Ambulance Service Board

The State Hospitals Board for Scotland

^(a) 1994 c.39; section 2 was amended by the Environment Act 1995 (c. 25), Schedule 22, paragraph 232(1).

^(b) 2005 asp 12.

^(c) 1978 c.29; section 2 was amended by the Health and Social Services and Social Security Adjudications Act 1983 (c. 41), section 14(2) and Schedule 7, paragraph 1; the National Health Service and Community Care Act 1990 (c.19), section 66(1) and Schedule 9, paragraph 19(1); the National Health Service Reform (Scotland) Act 2004 (asp 7), schedule 1, paragraph 1(1) and (2) and the Smoking, Health and Social Care (Scotland) Act 2005 (asp 13), schedule 2, paragraph 2(1) and (2). There are other amendments to section 2 which are not relevant for the purposes of this instrument.

Educational institutions

The board of management of a college of further education (within the meaning given by section 36(1) of the Further and Higher Education (Scotland) Act 1992^(a))

An institution which is a fundable post-16 education body in receipt of funding from the Scottish Further and Higher Education Funding Council or a regional strategic body (within the meaning of the Further and Higher Education (Scotland) Act 2005^(b)), other than any such institution whose activities are principally carried on outwith Scotland

Police

The chief constable of the Police Service of Scotland

The Scottish Police Authority

Others

Audit Scotland

The Board of Trustees for the National Galleries of Scotland

The Board of Trustees of the National Museums of Scotland

The Board of Trustees of the Royal Botanic Garden, Edinburgh

The British Waterways Board

The Cairngorms National Park Authority

Creative Scotland

The Crofting Commission

Highlands and Islands Enterprise

Historic Environment Scotland

An integration joint board established by order under section 9(2) of the Public Bodies (Joint Working) (Scotland) Act 2014^(c)

The James Hutton Institute

The Loch Lomond and The Trossachs National Park Authority

The Moredun Research Institute

The National Library of Scotland

The Scottish Children's Reporter Administration

Scottish Enterprise

The Scottish Environment Protection Agency

The Scottish Fire and Rescue Service

The Scottish Further and Higher Education Funding Council

^(a) 1992 c.37.

^(b) 2005 asp 6; section 35(1) was relevantly amended by the Post-16 Education (Scotland) Act 2013 (asp 12) to include definitions for "fundable post-16 education body" and "regional strategic body". There are other amendments which are not relevant for the purposes of this Order.

^(c) 2014 asp 9.

The Scottish Legal Aid Board

Scottish Natural Heritage

The Scottish Public Services Ombudsman

The Scottish Qualifications Authority

The Scottish Social Services Council

The Scottish Sports Council

Scottish Water

Social Care and Social Work Improvement Scotland

VisitScotland

SCHEDULE 2

Article 4

REPORT ON COMPLIANCE WITH CLIMATE CHANGE DUTIES

PART 1: PROFILE OF REPORTING BODY

1(a) Name of reporting body

Provide the name of the listed body (the “body”) which prepared this report.

--

1(b) Type of body

--

1(c) Highest number of full-time equivalent staff in the body during the report year

--

1(d) Metrics used by the body

Specify the metrics that the body uses to assess its performance in relation to climate change and sustainability.

<i>Metric</i>	<i>Units</i>	<i>Value</i>	<i>Comments</i>

1(e) Overall budget of the body
Specify approximate £/annum for the report year.

1(f) Report year
Specify the report year.

1(g) Context
Provide a summary of the body's nature and functions that are relevant to climate change reporting.

PART 2: GOVERNANCE, MANAGEMENT AND STRATEGY

Governance and management

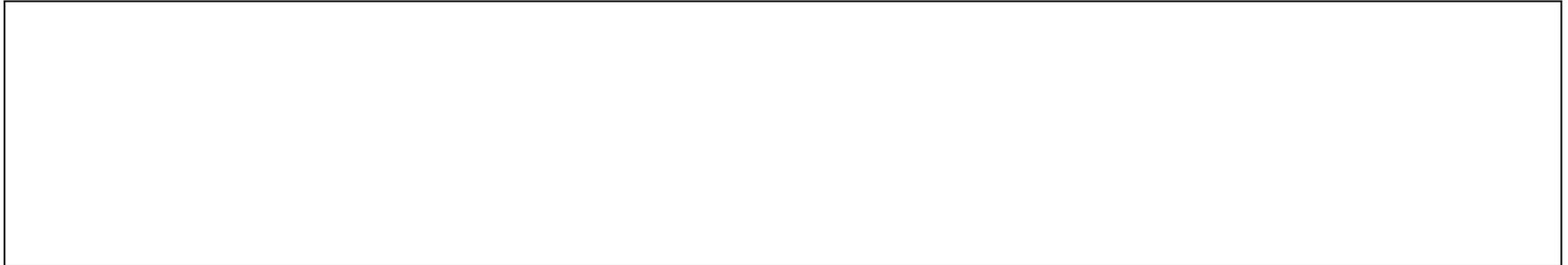
2(a) How is climate change governed in the body?

Provide a summary of the roles performed by the body's governance bodies and members in relation to climate change. If any of the body's activities in relation to climate change sit outside its own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify these activities and the governance arrangements.

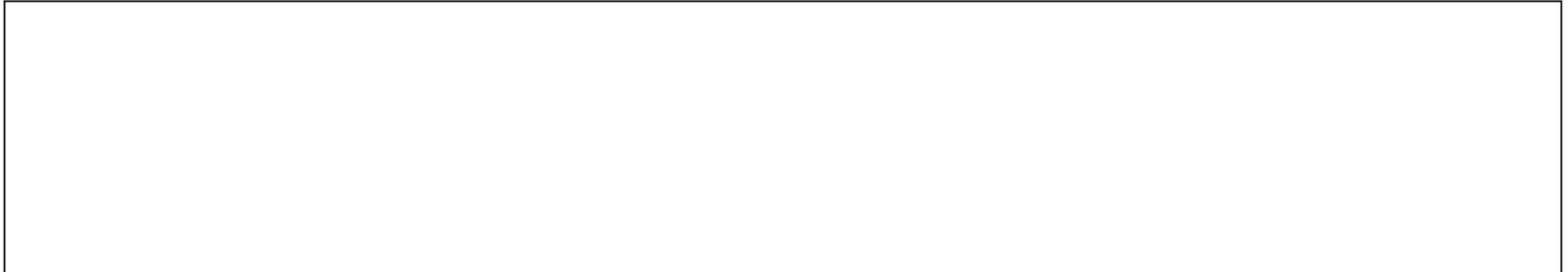
Provide a diagram / chart to outline the governance structure within the body.

2(b) How is climate change action managed and embedded by the body?

Provide a summary of how decision-making in relation to climate change action by the body is managed and how responsibility is allocated to the body's senior staff, departmental heads etc. If any such decision-making sits outside the body's own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify how this is managed and how responsibility is allocated outside the body.



Provide a diagram to show how responsibility is allocated to the body's senior staff, departmental heads etc.



Strategy

2(c) Does the body have specific climate change mitigation and adaptation objectives in its corporate plan or similar document?

Provide a brief summary of objectives if they exist.

<i>Wording of objective</i>	<i>Name of document</i>

2(d) Does the body have a climate change plan or strategy?

If yes, provide the name of any such document and details of where a copy of the document may be obtained or accessed.

--

2(e) Does the body have any plans or strategies covering the following areas that include climate change?

Provide the name of any such document and the timeframe covered.

<i>Topic area</i>	<i>Name of document</i>	<i>Time period covered</i>	<i>Comments</i>
Adaptation			
Business travel			
Energy efficiency			
Fleet transport			
Information and communication technology			
Renewable energy			
Sustainable / renewable heat			
Waste management			
Water and sewerage			
Land use			
Other			

2(f) What are the body's top 5 priorities for climate change governance, management and strategy for the year ahead?

Provide a brief summary of the body's areas and activities of focus for the year ahead.

2(g) Has the body used the Climate Change Assessment Tool^(a) or equivalent tool to self-assess its capability / performance?
If yes, please provide details of the key findings and resultant action taken.

Further information

2(h) Supporting information and best practice
Provide any other relevant supporting information and any examples of best practice by the body in relation to governance, management and strategy.

^(a) This refers to the tool developed by Resource Efficient Scotland for self-assessing an organisation's capability / performance in relation to climate change.

PART 3: EMISSIONS, TARGETS AND PROJECTS

Emissions

3(a) Emissions from the start of the year which the body uses as a baseline (for its carbon footprint) to the end of the report year

Complete the following table using the greenhouse gas emissions total for the body calculated on the same basis as for its annual carbon footprint / management reporting or, where applicable, its sustainability reporting. Include greenhouse gas emissions from the body’s estate and operations^(a) (measured and reported in accordance with Scopes 1 & 2 and, to the extent applicable, selected Scope 3 of the Greenhouse Gas Protocol^(b)). If data is not available for any year from the start of the year which is used as a baseline to the end of the report year, provide an explanation in the comments column.

<i>Reference year</i>	<i>Year</i>	<i>Year type</i>	<i>Scope 1</i>	<i>Scope 2</i>	<i>Scope 3</i>	<i>Total</i>	<i>Units</i>	<i>Comments</i>
Baseline carbon footprint							tCO2e	
Year 1 carbon footprint							tCO2e	
Year 2 carbon footprint							tCO2e	
Year 3 carbon footprint							tCO2e	
Year 4 carbon footprint							tCO2e	
Year 5 carbon footprint							tCO2e	
Year 6 carbon footprint							tCO2e	
Year 7 carbon footprint							tCO2e	
Year 8 carbon footprint							tCO2e	
Year 9 carbon footprint							tCO2e	
Year 10 carbon footprint							tCO2e	
Year 11 carbon footprint							tCO2e	
Year 12 carbon footprint							tCO2e	
Year 13 carbon footprint							tCO2e	
Year 14 carbon footprint							tCO2e	
Year 15 carbon footprint							tCO2e	

^(a) No information is required on the effect of the body on emissions which are not from its estate and operations.

^(b) This refers to the document entitled “*The greenhouse gas protocol. A corporate accounting and reporting standard (revised edition)*”, World Business Council for Sustainable Development, Geneva, Switzerland / World Resources Institute, Washington DC, USA (2004), ISBN: 1-56973-568-9.

3(c) Generation, consumption and export of renewable energy

Provide a summary of the body's annual renewable generation (if any), and whether it is used or exported by the body.

<i>Generation of renewables</i>	<i>Total generated (kWh)</i>	<i>Total consumed by the body (kWh)</i>	<i>Total exported (kWh)</i>	<i>Comments</i>
Renewable electricity				
Renewable heat				
Other 1 (specify in comments)				
Other 2 (specify in comments)				
Other 3 (specify in comments)				

Targets

3(d) Targets

List all of the body’s targets of relevance to its climate change duties. Where applicable, overall carbon targets and any separate land use, energy efficiency, waste, water, information and communication technology, transport, travel and heat targets should be included.

<i>Name of target</i>	<i>Type of target</i>	<i>Target</i>	<i>Units</i>	<i>Boundary / scope of target</i>	<i>Year used as baseline</i>	<i>Baseline figure</i>	<i>Units of baseline</i>	<i>Target completion year</i>	<i>Comments</i>

Projects and changes

3(e) Estimated total annual carbon savings from all projects implemented by the body in the report year

If no projects were implemented against an emissions source, enter “0”.

If the body does not have any information for an emissions source, enter “Unknown”.

If the body does not include the emissions source in its carbon footprint, enter “N/A”.

<i>Emissions source</i>	<i>Total estimated annual carbon savings (tCO_{2e})</i>	<i>Comments</i>
Electricity		
Natural gas		
Other heating fuels		
Waste		
Water and sewerage		
Business travel		
Fleet transport		
Other 1 (specify in comments)		
Other 2 (specify in comments)		
Other 3 (specify in comments)		
Total		

3(f) Detail the top 10 carbon reduction projects to be carried out by the body in the report year

Provide details of the 10 projects which are estimated to achieve the highest carbon savings during report year.

<i>Project name</i>	<i>Funding source</i>	<i>First full year of CO₂e savings</i>	<i>Are these savings figures estimated or actual?</i>	<i>Capital cost (£)</i>	<i>Operational cost (£/annum)</i>	<i>Project lifetime (years)</i>	<i>Primary fuel / emission source saved</i>	<i>Estimated carbon savings per year (tCO₂e/annum)</i>	<i>Estimated costs savings (£/annum)</i>	<i>Behaviour change</i>	<i>Comments</i>

- 3(g) Estimated decrease or increase in the body’s emissions attributed to factors (not reported elsewhere in this form) in the report year**
 If the emissions increased or decreased due to any such factor in the report year, provide an estimate of the amount and direction.

<i>Emissions source</i>	<i>Total estimated annual emissions (tCO_{2e})</i>	<i>Increase or decrease in emissions</i>	<i>Comments</i>
Estate changes			
Service provision			
Staff numbers			
Other 1 (specify in comments)			
Other 2 (specify in comments)			
Other 3 (specify in comments)			
Total			

3(h) Anticipated annual carbon savings from all projects implemented by the body in the year ahead

If no projects are expected to be implemented against an emissions source, enter “0”.

If the body does not have any information for an emissions source, enter “Unknown”.

If the body does not include the emissions source in its carbon footprint, enter “N/A”.

<i>Emissions source</i>	<i>Total estimated annual carbon savings (tCO_{2e})</i>	<i>Comments</i>
Electricity		
Natural gas		
Other heating fuels		
Waste		
Water and sewerage		
Travel		
Fleet transport		
Other 1 (specify in comments)		
Other 2 (specify in comments)		
Other 3 (specify in comments)		
Total		

- 3(i) Estimated decrease or increase in the body’s emissions attributed to factors (not reported elsewhere in this form) in the year ahead**
 If the emissions are likely to increase or decrease due to any such factor in the year ahead, provide an estimate of the amount and direction.

<i>Emissions source</i>	<i>Total estimated annual emissions (tCO₂e)</i>	<i>Increase or decrease in emissions</i>	<i>Comments</i>
Estate changes			
Service provision			
Staff numbers			
Other 1 (specify in comments)			
Other 2 (specify in comments)			
Other 3 (specify in comments)			
Total			

- 3(j) Total carbon reduction project savings since the start of the year which the body uses as a baseline for its carbon footprint**
 If the body has data available, estimate the total emissions savings made from projects since the start of that year (“the baseline year”).

<i>Total savings</i>	<i>Total estimated emissions savings (tCO_{2e})</i>	<i>Comments</i>
Total project savings since the baseline year		

Further information

- 3(k) Supporting information and best practice**
 Provide any other relevant supporting information and any examples of best practice by the body in relation to its emissions, targets and projects.

PART 4: ADAPTATION

Assessing and managing risk

4(a) Has the body assessed current and future climate-related risks?

If yes, provide a reference or link to any such risk assessment(s).

4(b) What arrangements does the body have in place to manage climate-related risks?

Provide details of any climate change adaptation strategies, action plans and risk management procedures, and any climate change adaptation policies which apply across the body.

Taking action

4(c) What action has the body taken to adapt to climate change?

Include details of work to increase awareness of the need to adapt to climate change and build the capacity of staff and stakeholders to assess risk and implement action.



4(d) Where applicable, what progress has the body made in delivering the policies and proposals referenced N1, N2, N3, B1, B2, B3, S1, S2 and S3 in the Scottish Climate Change Adaptation Programme^(a) (“the Programme”)?

If the body is listed in the Programme as a body responsible for the delivery of one or more policies and proposals under the objectives N1, N2, N3, B1, B2, B3, S1, S2 and S3, provide details of the progress made by the body in delivering each policy or proposal in the report year. If it is not responsible for delivering any policy or proposal under a particular objective enter “N/A” in the ‘Delivery progress made’ column for that objective.

<i>Objective</i>	<i>Objective reference</i>	<i>Theme</i>	<i>Policy / proposal reference</i>	<i>Delivery progress made</i>	<i>Comments</i>
Understand the effects of climate change and their impacts on the natural environment.	N1	Natural Environment			
Support a healthy and diverse natural environment with capacity to adapt.	N2	Natural Environment			
Sustain and enhance the benefits, goods and services that the natural environment provides.	N3	Natural Environment			
Understand the effects of climate change and their impacts on buildings and infrastructure networks.	B1	Buildings and infrastructure networks			
Provide the knowledge, skills and tools to manage climate change impacts on buildings and infrastructure.	B2	Buildings and infrastructure networks			
Increase the resilience of buildings and infrastructure networks to sustain and enhance the benefits and services provided.	B3	Buildings and infrastructure networks			
Understand the effects of climate change and their impacts on people, homes and communities.	S1	Society			
Increase the awareness of the impacts of climate change to enable people to adapt to future extreme weather events.	S2	Society			
Support our health services and emergency responders to enable them to respond effectively to the increased pressures associated with a changing climate.	S3	Society			

^(a) This refers to the programme for adaptation to climate change laid before the Scottish Parliament under section 53(2) of the Climate Change (Scotland) Act 2009 (asp 12) which currently has effect. The most recent one is entitled “*Climate Ready Scotland: Scottish Climate Change Adaptation Programme*” dated May 2014.

Review, monitoring and evaluation

4(e) What arrangements does the body have in place to review current and future climate risks?

Provide details of arrangements to review current and future climate risks, for example, what timescales are in place to review the climate change risk assessments referred to in Question 4(a) and adaptation strategies, action plans, procedures and policies in Question 4(b).

4(f) What arrangements does the body have in place to monitor and evaluate the impact of the adaptation actions?

Please provide details of monitoring and evaluation criteria and adaptation indicators used to assess the effectiveness of actions detailed under Question 4(c) and Question 4(d).

Future priorities for adaptation

- 4(g) What are the body's top 5 priorities for the year ahead in relation to climate change adaptation?**
Provide a summary of the areas and activities of focus for the year ahead.

Further information

- 4(h) Supporting information and best practice**
Provide any other relevant supporting information and any examples of best practice by the body in relation to adaptation.

PART 5: PROCUREMENT

5(a) How have procurement policies contributed to compliance with climate change duties?

Provide information relating to how the procurement policies of the body have contributed to its compliance with climate changes duties.

5(b) How has procurement activity contributed to compliance with climate change duties?

Provide information relating to how procurement activity by the body has contributed to its compliance with climate changes duties.

Further information

5(c) Supporting information and best practice

Provide any other relevant supporting information and any examples of best practice by the body in relation to procurement.

PART 6: VALIDATION AND DECLARATION

6(a) Internal validation process

Briefly describe the body's internal validation process, if any, of the data or information contained within this report.

6(b) Peer validation process

Briefly describe the body's peer validation process, if any, of the data or information contained within this report.

6(c) External validation process

Briefly describe the body's external validation process, if any, of the data or information contained within this report.

6(d) No validation process

If any information provided in this report has not been validated, identify the information in question and explain why it has not been validated.

--

6(e) Declaration

I confirm that the information in this report is accurate and provides a fair representation of the body's performance in relation to climate change.

Name	
Role in the body	
Date	

EXPLANATORY NOTE

(This note is not part of the Order)

This Order requires the bodies listed in Schedule 1 to prepare reports on compliance with climate change duties imposed under (or by virtue of) section 44 of the Climate Change (Scotland) Act 2009.

It also sets out the information to be reported, the form of the reports and the period within which each report must be sent to the Scottish Ministers.

Annex B – Public Sector Bodies currently required to report

180 Public Sector Bodies are currently required to submit annual reports on their climate change activity. They can be divided into the following categories:

- Educational institutions
- Integration Joint Boards
- Local government
- National Health Services
- Transport Partnerships
- Others

In 2011, the Scottish Government set out an expectation that some Public Sector Bodies should be particularly ambitious with regard to climate change action (*Public Bodies Climate Change Duties: putting them into practice* <https://www.gov.scot/publications/public-bodies-climate-change-duties-putting-practice-guidance-required-part/>). This guidance defined ‘major players’ as bodies with large estates and/or staff numbers, high impact and influence, large expenditure, or those with an auditing or regulatory function. The 2015 Order introduced “Listed bodies” who would be explicitly required to report.

Educational Institutions (44)

Abertay University
Ayrshire College
Borders College
City of Glasgow College
Dumfries and Galloway College
Dundee and Angus College
Edinburgh College
Edinburgh Napier University
Fife College
Forth Valley College
Glasgow Caledonian University
Glasgow Clyde College
Glasgow Kelvin College
Glasgow School of Art
Heriot-Watt University
Inverness College UHI
Lews Castle College UHI
Moray College UHI
New College Lanarkshire
Newbattle Abbey College
North East Scotland College
North Highland College UHI
Orkney College UHI
Perth College UHI
Queen Margaret University
Robert Gordon University
Sabhal Mor Ostaig UHI

Scotland's Rural College
Shetland College UHI
South Lanarkshire College
The Open University in Scotland
The Royal Conservatoire of Scotland
University of Aberdeen
University of Dundee
University of Edinburgh
University of Glasgow
University of St Andrews
University of Stirling
University of Strathclyde
University of the Highlands and Islands
University of the West of Scotland
West College Scotland
West Highland College UHI
West Lothian College

National Health Service (19)

NHS Ayrshire and Arran
NHS Borders
NHS Dumfries and Galloway
NHS Education for Scotland
NHS Fife
NHS Forth Valley
NHS Grampian
NHS Greater Glasgow and Clyde
NHS Highland
NHS Lanarkshire
NHS Lothian
Common Services Agency
NHS Orkney
NHS Shetland
NHS Tayside
NHS Western Isles
The National Waiting Times Centre Board
The Scottish Ambulance Service
The State Hospitals Board for Scotland

Transport (7)

Highlands and Islands Transport Partnership (HITRANS)
North-East of Scotland Transport Partnership (NESTRANS)
Shetland Transport Partnership (ZetTrans)
South-East of Scotland Transport Partnership (SESTRAN)
South-West of Scotland Transport Partnership (SWESTRANS)
Strathclyde Partnership for Transport (SPT)
Tayside and Central Scotland Transport Partnership (TACTRAN)

Local Authorities (32)

Aberdeen City Council
Aberdeenshire Council
Angus Council
Argyll and Bute Council
City of Edinburgh Council
Clackmannanshire Council
Comhairle nan Eilean Siar (Western Isles Council)
Dumfries and Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
East Renfrewshire Council
Falkirk Council
Fife Council
Glasgow City Council
Inverclyde Council
Midlothian Council
Moray Council
North Ayrshire Council
North Lanarkshire Council
Orkney Islands Council
Perth and Kinross Council
Renfrewshire Council
Scottish Borders Council
Shetland Islands Council
South Ayrshire Council
South Lanarkshire Council
Stirling Council
The Highland Council
West Dunbartonshire Council
West Lothian Council

Other Reporting Bodies (48)

Accountant in Bankruptcy
Audit Scotland
Creative Scotland
Disclosure Scotland
Education Scotland
Food Standards Scotland
Highlands and Islands Enterprise
Historic Environmental Scotland
Revenue Scotland
Scottish Canals
Scottish Enterprise
Scottish Environment Protection Agency
Scottish Natural Heritage (SNH)

Scottish Water
Skills Development Scotland
Scottish Sports Council
The Cairngorms National Park Authority
Social Care and Social Work Improvement Scotland
The Chief Constable of the Police Service of Scotland
The Crofting Commission
The James Hutton Institute
The Loch Lomond and The Trossachs National Park Authority
The Moredun Research Institute
The National Galleries of Scotland
The National Library of Scotland
The National Museums of Scotland
The National Records of Scotland
The Office of the Scottish Charity Regulator
The Registers of Scotland
The Registrar General of Births, Deaths and Marriages of Scotland
The Royal Botanic Garden Edinburgh
The Scottish Children's Reporter Administration
The Scottish Courts and Tribunals Service
The Scottish Fire and Rescue Service
The Scottish Further and Higher Education Funding Council
The Scottish Government
The Scottish Housing Regulator
The Scottish Legal Aid Board
The Scottish Parliament
The Scottish Police Authority
The Scottish Prison Service
The Scottish Public Pensions Agency
The Scottish Public Services Ombudsman
The Scottish Qualifications Authority
The Scottish Social Services Council
The Students Awards Agency Scotland
Transport Scotland
VisitScotland

Integration Joint Boards (IJBs; 30)

Aberdeen City IJB
Aberdeenshire IJB
Angus IJB
Argyll and Bute IJB
City of Edinburgh IJB
Clackmannanshire and Stirling IJB
Dumfries and Galloway IJB
Dundee City IJB
East Ayrshire IJB
East Dunbartonshire IJB
East Lothian IJB
East Renfrewshire IJB

Falkirk IJB
Fife IJB
Glasgow City IJB
Inverclyde IJB
Midlothian IJB
Moray IJB
North Ayrshire IJB
North Lanarkshire IJB
Orkney IJB
Perth and Kinross IJB
Renfrewshire IJB
Scottish Borders IJB
Shetland IJB
South Ayrshire IJB
South Lanarkshire IJB
West Dunbartonshire IJB
West Lothian IJB
Western Isles IJB

Annex C

Respondent Information Form

Please Note this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:
<https://beta.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual
 Organisation

Full name or organisation's name

If you are responding as an organisation, which of the following applies:

- public sector body
Is your organisation a 'listed body' (required to report in accordance with the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015)?
 Yes
 No
- private sector organisation
 third sector organisation

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
- Publish response only (without name)
- Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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
- No

Annex D – Consultation Questions

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

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

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 / no / don't know Please explain your answer.

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

Yes / no / don't know Please explain your answer.

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 / no / don't know Please explain your answer.

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

Yes / no / don't know If you answered no, please specify which aspect of the proposal you disagree with and why.

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

Yes / no / don't know If you answered no, please specify which aspect of the proposal you disagree with.

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

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

Yes / no / don't know Please explain your answer.

Other comments.



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