

# Policy and Sustainability Committee

10.00am, Tuesday, 26 November 2019

## The Role of Public Sector Bodies in Tackling Climate Change – Response to Consultation

Executive/routine  
Wards  
Council Commitments

### 1. Recommendations

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- 1.1 It is recommended that the Policy and Sustainability Committee approves the Council submission to the Scottish Government consultation on 'The role of public sector bodies in tackling climate change'.

**Andrew Kerr**

Chief Executive

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## The Role of Public Sector Bodies in Tackling Climate Change – Response to Consultation

### 2. Executive Summary

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- 2.1 This report includes the Council's response to the Scottish Government's consultation on 'The Role of Public Sector Bodies in Tackling Climate Change'. The report highlights areas where the Council will seek to work proactively with the Scottish Government including overview of the policy, fiscal and statutory powers needed locally and nationally to ensure sufficient progress can be made to tackle climate change and deliver on ambitious national and local carbon emissions targets.
- 2.2 The report also highlights key areas where the Council believes further innovation, support or regulation and legislation may be needed, including aspects of policy related to Housing, Transport, Finance, Economic Growth, and Planning.

### 3. Background

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- 3.1 On 14 May 2019, the Cabinet Secretary for Environment, Climate Change and Land Reform gave a statement to Parliament about Scotland's response to the global climate emergency, and committed to consult widely on what needs to happen across the country in order to end Scotland's contribution to global warming.
- 3.2 In September 2019 the Scottish Government launched a consultation on the role of public sector bodies in ending Scotland's contribution to climate change at Saughton Park. The consultation asks how the Public Sector Climate Change Reporting Duties should be revised to support that, and how Scottish Government and the wider public sector can work together to make a step-change in delivery of climate action. This includes proposals to establish a High Ambition national group and a national forum on climate change.
- 3.3 The results of this consultation will help inform the Scottish Government's Climate Change Plan update and will inform plans to bring forward secondary legislation that alter the details of the public sector climate change reporting duties.

## 4. Main report

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- 4.1 The consultation response provided in Appendix 1 states that the Council welcomes this opportunity to provide a view on 'The Role of Public Sector Bodies in Tackling Climate Change'.
- 4.2 The Scottish Government decision to set stretching legal targets for Scotland to have net zero emissions by 2045 is in keeping with the City of Edinburgh Council which has set a very ambitious local target for Edinburgh to be carbon neutral by 2030.
- 4.3 Achieving this scale of change both at a national and local level will require a step change in focus and action across every area of policy and business that Government and Councils control and influence. This will undoubtedly be challenging but the City of Edinburgh Council also recognises that this presents a unique opportunity for all public bodies to work together to provide national leadership, test and develop innovative solutions, and co-create new ways of working.
- 4.4 Evidence and data must underpin all our activities to drive ambitious climate action. The Council has been supported by Leeds and Edinburgh University to map the city emissions trajectory and conduct an economic analysis of the necessary interventions that will take the city to carbon neutral by 2030.
- 4.5 Research gathered so far confirms that meeting the 2030 target will require:
  - 4.5.1 Ambitious and internationally significant levels of investment into low-carbon and energy efficiency measures at city level, spanning several hundred separate interventions (importantly, research also shows that these also represent investment opportunities that will pay for themselves over time).
  - 4.5.2 The need for carbon reduction strategies to be dynamic and ongoing processes. Technological change will bring new options for reducing emissions and may lower the cost of existing options.
  - 4.5.3 Significant partnership working across the city, and across Scotland. The City of Edinburgh Council alone cannot tackle the challenges of climate change, but the Council can leverage change by showing critical leadership, building on existing partnerships and seeking to think and act innovatively across the city.
  - 4.5.4 Support to bridge the gap left by current powers and investment capacity. The research shows that there is a significant gap in the actions that can be taken to get to zero carbon by 2030. Bridging this gap will require additional legislative powers, freedoms and flexibilities for Councils, along with additional investment from the public and private purse.
- 4.6 There are many areas where Councils will want to work proactively with the Scottish Government including in respect of the policy, fiscal and statutory powers needed locally and nationally to ensure sufficient progress can be made. The response in Appendix 1 provides an overview of these, as well as the key areas where further innovation, support or regulation and legislation may be needed.

- 4.7 Most importantly, however, to be fully effective at driving carbon emission reductions and tackling climate change, Councils need an empowering framework of legislation. Directive and detailed legislation may have a place but to lead action in a technologically evolving context such as this, the legal framework within which Councils operate must be flexible, empowering and durable over time.

## **5. Next Steps**

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- 5.1 The Council response to this Scottish Government consultation will be submitted by 6th December 2019.

## **6. Financial impact**

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- 6.1 There are no direct financial impacts arising from this report at this time.

## **7. Stakeholder/Community Impact**

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- 7.1 The response to the consultation has been developed from engagement with Council service areas led by the Council's Strategy and Communications Division.

## **8. Background reading/external references**

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

## **9. Appendices**

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Appendix 1 – City of Edinburgh Council response to: 'The Role of Public Sector Bodies in Tackling Climate Change' Consultation

# Appendix 1: City of Edinburgh Council response to: 'The Role of Public Sector Bodies in Tackling Climate Change' Consultation

## Introduction

The City of Edinburgh Council welcomes this opportunity to respond to the Scottish Government's consultation on 'The Role of Public Sector Bodies in Tackling Climate Change'.

The Scottish Government decision to set stretching legal targets for Scotland to have net zero emissions by 2045 shows welcome leadership and ambition in keeping with the City of Edinburgh Council which has set a very ambitious local target for Edinburgh to be carbon neutral by 2030.

Achieving this scale of change both at a national and local level will require a step change in focus and action across every area of policy and business that Government and Councils control and influence. This will undoubtedly be challenging but the City of Edinburgh Council also recognises that this presents the city and the country with an opportunity that could positively benefit not only the environment, but also our economies, jobs and everyday lives.

Accordingly, the Council is embarking on a programme of work with city partners to explore new and innovative ways of working and investing to tackle climate change and benefit from climate action. In keeping with this ambition, Edinburgh is also one of ten European Deep Demonstrator Cities who are collaborating with the European Climate Knowledge Innovation Community to drive the complex system change we need to see, ensuring that the capital city of Scotland is at the heart of a partnership with the leading innovative European cities.

All of this presents a unique opportunity to work together as central and local government as well as across all public bodies to provide national leadership, test and develop innovative solutions, and co-create new ways of working.

Evidence and data must underpin all our activities to drive ambitious climate action and as such the Council has been supported by Leeds and Edinburgh University to map the city emissions trajectory underpinned by an economic analysis of the necessary interventions that will take the city to carbon neutral by 2030.

The research found that by 2030 Edinburgh could reduce its 2019 levels of emissions by:

- **55.91% through Cost-Effective (CE) investments** that would pay for themselves (on commercial terms) over their lifetimes. This would require an overall city-wide investment of £3.976 billion over the next 11 years, with these investments generating average annual savings of £550.173 million, paying back the investment in 7.455 years before generating further savings for the lifetime of the measures.

- **61.83% through Cost-Neutral (CN)** investments that could be realised at no net cost to the city's economy if the savings from Cost-Effective measures were captured and re-invested in further low Carbon measures. This would require a city-wide investment of £7.492 billion over the next 11 years, with these investments generating average annual savings of £566.285 million, paying back the investment in 12.538 years before generating further savings for the lifetimes of measures.
- **67.230% with the exploitation of the full Technical-Potential (TP)** of the different measures. This would require a city-wide investment of at least £8.135 billion over the next 11 years generating approximate annual savings of £586.990 million, paying back the investment in 16.142 years and providing further savings over the lifetime of the measures.

These results represent ambitious and internationally significant levels of investment into low-carbon and energy efficiency measures at city level, spanning several hundred separate interventions but importantly show that they also represent investment opportunities that will pay for themselves over time.

The challenge Edinburgh faces in meeting its 2030 target also emphasises the need for carbon reduction strategies to be dynamic and ongoing processes. Technological change will bring new options for reducing emissions and may lower the cost of existing options.

This research makes clear that the City of Edinburgh Council alone cannot tackle the challenges of climate change, but the Council can leverage change by showing critical leadership, building on existing partnerships and seeking to think and act innovatively across the city.

However, the research has also shown that there is a significant gap in the actions that can be taken to get to zero carbon by 2030. Bridging this gap will require additional legislative powers, freedoms and flexibilities for Councils, along with additional investment from the public and private purse.

There are many areas where Councils will want to work proactively with the Scottish Government including in respect of the policy, fiscal and statutory powers needed locally and nationally to ensure sufficient progress can be made. The Council is looking forward to playing its full part in working with Government, COSLA, citizens, public bodies and wider partners, to accelerate the pace of change in mitigating and adapting to climate change.

## **Finance**

The Programme for Government recognised the need for all forms of finance and investment to support delivering climate action at scale across Scotland. The Green Deal, the SNIB, and the Growth Accelerator are all welcome commitments to generate investment in the unique opportunity that climate action offers. However, there will remain a need to ensure that public spending and investment decisions in national public bodies, and more locally based ones, contribute positively to the climate emergency in ways that are commensurate with the sense of emergency that citizens and experts have expressed.

Government support to generate public spending opportunities is very welcome as is support to leverage private sector funding into projects with cross sectoral partners which

take some degree of risk associated with innovative practice and technological advancement.

Government encouragement, support and guidance to ensure that all public bodies are equally bold in setting carbon neutral targets and embedding these into their daily decision making and business planning would further encourage the type of local collaboration (in policy and investment) that the Council is seeking with partner organisations.

In addition, the Scottish Government could show further leadership by encouraging the transition of public investment portfolios (such as the Lothian Pension Fund) from industries and sectors that rely on profits derived from carbon intensive and fossil fuel businesses and more actively towards those businesses that operate a sustainable business model that contributes to climate action.

## **Legislative**

Key areas where the Council believes further innovation, support or regulation and legislation may be needed are highlighted below. However, at the highest level, over the next 10 years, to be fully effective at driving carbon emission reductions and tackling climate change, Councils need an empowering framework of legislation. Directive and detailed legislation may have a place but to lead action in a technologically evolving context such as this, to be effective the legal framework within which Councils operate must be flexible, empowering and durable over time.

More specific areas are highlighted below:

## **Housing**

As demonstrated by the Scottish Government's recent legislative commitments to tackle energy efficiency and fuel poverty in citizens' homes (through the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 and Climate Change (Emissions Reduction Targets) (Scotland) Act 2019) there are clear links between climate change and addressing sustainability in the home.

The Council is interested in exploring the following with the Scottish Government

- **Low Carbon Heating**
  - Maximising the opportunities offered by an energy services company within the city as a necessary step towards producing more locally generated and distributed low carbon energy.
  - A wide range of end to end funding support on new low carbon heating solutions for new build and existing homes.
  - The creation of a Scottish Grid factor, to more accurately measure the carbon intensity of local energy consumption, and support around the financial impacts on the grid of moving to more widespread decarbonisation of heating
- **Wider funding opportunities and support**
  - Exploring the potential to expand financial support available to make homes more energy efficient through the Home Energy Efficiency Programmes for Scotland (HEEPS), especially targeting and supporting more deprived communities to bring homes up to the necessary energy efficient standards. This can be achieved, for example by building on the success of the Area Based Schemes (ABS) and Warmer Homes Scotland programme to target low-income homeowners or tenants in the private sector, no matter where in the city they are, with grants and support or by extending the interest-free Home Energy

Scotland Loan Scheme to incentivise owner occupiers and registered private sector landlords.

- Mechanisms for incentivising owner-occupiers and private sector landlords to undertake comprehensive retro-fitting domestic properties, including the potential for a new boiler scrappage scheme and expansion of renewables support
- Innovation: The Council is also looking at ways to support innovation and test of change programmes for example
  - where householders would benefit from replacing their electrical heating systems with new low carbon technologies.
  - Delivering accelerated retro-fitting of social housing, with a particular focus on homes within those areas facing fuel poverty; and bringing Edinburgh's diverse housing stock up to EPC level B.

## **Planning**

The newly introduced Planning (Scotland) Act 2019 is a useful and welcome framework for ensuring that climate change is embedded throughout the planning process. However, the commitment to addressing the climate emergency and setting of ambitious national and local carbon targets have moved on even in the short time since that legislation was passed. To keep up with the evolving context the Council would welcome powers being afforded to planning authorities to embed climate considerations into development proposals, development plans and design guidance. In the meantime, Guidance on Climate Change for Planners developed in partnership with the RTPI Scotland would be helpful.

The Council is also keen to collaborate with Scottish Government and the Scottish Land Commission to develop a Property and Land Strategy to consolidate all Public Bodies' building stock. This can ensure that

- a. buildings which are retained are retrofitted to the highest possible standards,
- b. building management systems are in place for future planning, and
- c. those assets which are disposed of are done so responsibly and sustainably.

In addition, the Council would welcome support to identify vacant and derelict land that is suitable for greening and rewilding, with a view to its change of use as designated open space.

## **Economic Growth**

To achieve our climate change ambitions, the Council needs to ensure economic growth delivers coordinated, strategic improvements that respond to the climate emergency, ensuring current and future investment supports inclusive and sustainable growth in our communities. In this respect the Council welcomes the Scottish Government commitment to Circular Economy Bill next year. The Council would also welcome working with the Scottish Government to:

- Develop new skills programmes (national and local) that train designers, builders and installers in the skills needed for implementing low-carbon heating, energy and water efficiency, ventilation and thermal comfort, and property-level flood and severe weather resilience in both new build and retrofit.
- Establish enhanced and targeted local and national programmes of support aimed at low carbon business models and their adoption by new, growing and established businesses of all sizes.

- National action to raise awareness of the business benefit for adopting low carbon business models and the cost to businesses of maintaining a 'status quo' approach; understanding of the desirability of these practices by the customer and a means of supporting customer recognition of low carbon firms.
- Support for citywide action to provide business leadership, role models, peer to peer support for a step change in business culture.
- Support to continue the work of partners such as Zero Waste Scotland to identify specific circular economy business opportunities in Edinburgh. 2 examples include:
  - taking advantage of Edinburgh's strong knowledge and scientific research sector where computer hardware can be refurbished and remanufactured for the city's growing data storage industry.
  - re-producing the by-products of Edinburgh's breweries and distilleries into animal feed or biogas for heating or power generation.

### **Transport:**

Although the recently passed Transport (Scotland) Bill considers steps towards delivering low emissions targets, the Council could see an argument for this framework being further enhanced through secondary legislation or immediate guidance to provide local authorities with the appropriate powers and/or support to develop carbon neutral local transport systems.

At a strategic level, the development of the new local and regional transport strategies should include ambitious targets for modal shift with associated delivery plans. Capital investment from the Scottish Government and support to identify and leverage investment, including from the private sector, in transport infrastructure is critical to the City's capability to expand its transport networks sustainably and make progress in reducing the City's carbon emissions. The Council is particularly interested in exploring the following investment opportunities with the Scottish Government:

- Investment in new demand led mobility solutions which support active travel choices and deliver new incentives to manage travel demand.
- Investment to expand and accelerate measures to reduce pollution and improve air quality through projects identified in the Council's city centre transformation programme.
- Further investment to expand and accelerate provision of electric vehicle charging infrastructure throughout the city will be a helpful measure in encouraging and incentivising the use of electric vehicles

The aviation sector is the second most-polluting form of transport after the diesel car. The projected growth of aviation makes it a major concern for climate change and this is one such industry which should be thinking and acting long-term by working with the Public Sector to reduce indirect emissions. Airports in Aberdeen, Edinburgh and Glasgow should work with their respective local authorities to explore ways in which they can mitigate the harmful effects of air travel to and from these cities including through local offsetting schemes. This will require dynamic leadership and mutual collaboration that the Council is keen to explore.

### **Part 1: Information and collaboration**

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

### **Guidance**

Supportive expert guidance from the Government that sets clear political expectations for prioritisation of climate action and a radical approach to delivering ambitious carbon targets would be welcome. This needs to emphasise the 'whole system' approach needed to truly drive change.

Government guidance emphasising to all organisations spending public resources, the importance of embedding climate change and broader biodiversity and sustainability commitments across organisational structures is welcome. This should include the prioritisation and visibility of sustainability in governance structures in order to encourage transparent accountability and senior responsibility.

Pro-active expert support from the Government to identify 'low hanging fruit' and prioritise areas of change and investment across public bodies would be welcome.

Clearly, there will come a point when legislation in Planning, Transport and Housing will need to be reviewed to ensure that it keeps pace with the level of change required. However, in the meantime, advice from the Government on how current legislative parameters and duties within distinct policy remits can be flexed to drive change would be welcome.

Guidance – or support in another form - would also be welcome for identifying the ways in which public bodies can maximise the climate opportunity in major public sector investments and projects, including public events (sporting, cultural and civil events), and major national infrastructure developments. These 'significant events' and projects could act as key leverage opportunities to scale up action on climate change and widespread public engagement.

The Scottish Government should lead by example in mainstreaming and prioritising climate action across all its directorate activity.

### **Information**

Information is needed to promote the fundamentals of mitigation, adaptation and 'acting sustainably' to citizens, public sector workforces and its leaders. Within this is the need to emphasise the crucial importance of mainstreaming climate change action into strategic and corporate processes to ensure that climate action becomes a way of being and not a project that organisations do in addition to their core remit.

Information on developing organisational emissions inventory and access to better organisational information on emission sources is important. Data and performance reporting should primarily be focused on changing behaviours and driving improvement and further action. However, there is value at the highest level, in being able to benchmark progress against other key partners, sectors and cities. This is why Edinburgh is developing an emissions baseline consistent with other leading European and UK cities. Support to ensure that this is consistent within Scotland would also be welcome.

Better communication is also required around what funding and other opportunities exist for all public bodies to take forward innovative and radical change projects in collaboration with private and third sector partners.

The Scottish Government could play a key role in supporting the sharing the information it holds around the innovative pilot activity across Scotland (and beyond into the wider UK and EU) but also in sharing evaluated case studies of successful projects that have impacted on carbon emissions.

## **Training**

Support for the training and upskilling of all levels of public sector employees in respect of sustainability and climate action is needed. This should ideally be cross organisational and used as a means to support collaboration and shared understanding between these organisation. However, Councils, as with all public bodies, face a further challenge around capacity as budgets restrict that training alone cannot overcome.

The principles of introducing a “Climate Solutions qualification” are supported however the scope of this should to go beyond “middle and senior managers” to benefit all officers whose work will have an impact on climate change mitigation and adaptation.

Elected Members already undertake training for licensing committees and will do so for planning committees under measures that will be introduced in the Planning (Scotland) Act 2019. We propose that Elected Members should also have the opportunity to undergo this training to better understand the complexity of climate change and how it permeates through all portfolio areas. A good example of this is the recent training COSLA delivered to Elected Members on climate change adaptation. More of this type of training is needed.

Carbon management and reporting training is essential to help officers assess, measure and report on emissions. This will increase understanding and skills to both do project level assessments and also commission the right forms of professional support when this is needed. Professional project level carbon assessment and management is also a key aspect of helping to build business cases for investment and budget allocations. Training on building project level business cases will also be increasingly important. This is key area for investment in capacity and skill in public sector. The Scottish Government and the Improvement Service should focus their capacity in this area.

Other measures should include training to officers who are providing data for annual Public Bodies Duties reports which can perform an important function in terms of transparent accountability and performance improvement.

Training and skill development would also be welcome in respect of sustainable and innovative finance and investment opportunities. Specifically focused on understanding new models of financing and opportunities for blended investment models that use new models and experimentation with partnerships and on how to approach financial risk. Support from the likes of Audit Scotland around what reasonable levels of financial risk taking entails in this context would also be beneficial.

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

We agree with broad objectives for the High Ambition Climate Network. The City of Edinburgh Council would welcome the opportunity to contribute in any way possible to

make a success of this Network jointly led by Scottish and Local Government. However, while it is welcome that such a group would be led by a member of the Cabinet, the Council would seek reassurance that the corporate nature of the climate challenge would be recognised across the work of the Government and that ministers and the most senior officers responsible for transport, energy, housing, skills and economy should also commit to engage regularly and collaboratively with the group.

In addition, the Council would seek reassurance that this will be a group focused on collaboration and action as much as it is on sharing ideas and best practice. To do this, the group must be supported by sufficient and joint officer and expert resources to move the agenda on between meetings.

## **National Forum on Climate Change**

The proposal for a National Forum on Climate Change is very welcome. Public Sector Bodies alone cannot tackle the climate crisis. There needs to be a concerted effort where responsibilities are shared between organisations in the Public, Private and Voluntary Sectors and that the innovation and drive of civil society in particular is encouraged and supported.

## **SSN**

While the role and function of SSN may helpfully evolve, the Council has reservations about the proposal to end all financial support for the SSN Secretariat. SSN provide the vital support mechanisms, training and sharing of experience at officer level for those tasked with delivery of organisational climate change ambitions. There would be no mechanisms for officers who are at forefront of delivery to input their experience and expertise if SSN was no longer supported.

## **Part 2: Targets and reporting**

### **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?**

The City of Edinburgh Council has set an ambitious target to make the city carbon neutral by 2030 – fifteen years ahead of the Scottish Government's target. As a Public Body, the Council is committed to working with partners in the public, private and third sectors to realise this ambition. Our Short Window Improvement Plan [<https://democracy.edinburgh.gov.uk/documents/s9898/Item%204.3%20-%20Update%20on%20Short%20Window%20Improvement%20Plan.pdf>] illustrates the immediate steps that the Council is taking.

Targets and public reporting are important and can be a useful driver for policy and action. However, the technical work associated with the setting of targets, and the work required to monitor and report on progress can divert resources from action to improve or implement change. Target setting that requires and drives action and active collaboration towards a common goal would be welcome.

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

As stated in our response, the Council recognises the importance of reporting on targets to maintain and improve actions to reduce emissions. An annual report can be a useful tool for guiding Public Sector Bodies but should not be seen as an end in itself or it risks diverting scarce public sector capacity away from improvement and action. This is increasingly true as public sector resources retract.

Further discussion on what Public Bodies are asked to report on would therefore be welcome. For example, the mainstreaming of climate action and in particular, emissions reductions into everyday processes is extremely positive and likely to have a significant impact over time. Similarly, when setting mandatory data reporting the Scottish Government needs to be assured that data actually exists or again, a disproportionate amount of resources can be spent trying to retrofit data collation processes or find other, less meaningful ways, of complying with reporting duties.

The question in particular asks about reporting on resources. This is welcome in part because the focus is on how Public Bodies spend their budgets and the extent to which those decisions drive action and change. However, 'resources' come in many forms and there is a danger that these types of statements miss meaningful action or fail to call out a lack of action because of the complexity around the concept of resources.

Evidence of collaboration; evidence of supporting innovative action and behaviour change, and evidence of impact on carbon emissions may be better 'change levers' in terms of public accountability and reporting. Feedback from the Scottish Government on Council action that shares learning and innovation could add significant value to local activities.

**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.

This would make the process quicker and reduce the time and resources required to implement changes to reporting requirements. It is our view that secondary legislation can be overly prescriptive therefore statutory guidance provides flexibility to reflect the miscellaneous areas in which Public Sector Bodies work.

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

Yes

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

Yes – but with certain provisions, as follows.

- We agree with the removal of **1(d)** [Metrics used by the body] and **1(g)** [Context] of **Part 1: Profile of Reporting Body**.
- We believe that **Part 2: Governance, Management and Strategy** should be amended rather than removed. This helps ensure that these structures which are crucial to tackling climate change exist and in a form that delivers. It would also be useful to have feedback on whether these are robust enough and how they can be improved.
- In **Part 3: Emissions, Targets and Projects**, we propose the following:

- We agree to retaining **3(a)**, **3(b)** and **(3c)** [Emissions]
- **3(d)** [Targets] should be amended to show target net zero date, and reduction milestone targets including for indirect emissions.
- **3(e)** through to **3(i)** [Projects and changes] and **3(k)** [Further information] should be amended and shortened rather than removed to show direction of travel, what is proposed in the next year and whether this is achieved in the following year.
- We agree that **Part 4: Adaptation** should be updated to reflect the new Capacity Framework guidance however much more detail is needed on how this section will be dealt with.
- Similarly the proposal provides no detail on how the sections on Procurement or Wider Influence will be dealt with.
- We agree with the proposals as set out for **Part 6: Validation**.

As a supportive measure, it would be helpful for the Scottish Government to publish a summary of the progress being made by public bodies with a view to highlighting learning and areas of significant progress. The current process of a one way flow of information is unsatisfactory and doesn't capture the potential within this reporting process.

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

The opportunity exists for the Scottish Government to lay the foundation for a strong joined up approach to public sector reporting duties. This could also present an opportunity to drive more joined up reporting within organisations at the same time as reducing the combined reporting burden.

Climate action crosses almost every area of Council activity and similarly for many other public bodies. Using this review of reporting duties to drive a whole system cross sectoral evaluation of progress on climate action could yield many benefits including greater reporting efficiency. Reporting should be proportionate and recognise that the resources needed for indepth reporting is ultimately resource that cannot be spent supporting action.

Again, as a supportive measure, it would be helpful for the Scottish Government to publish a summary of the progress being made by public bodies with a view to highlighting learning and areas of significant progress. It would also be helpful to understand the impact of the reporting on Scottish Government action and decision making.

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

Yes.

Reporting and analysis should communicate insights, contribute commentary and statements on status, progress, implications/gaps, and actions required to meet targets and better deliver action, including on adaptation. A platform for voluntary participation in sharing reports and assessing peer progress and challenges is critical and should include the Scottish Government. This move towards an open public data approach would be welcome especially where it supports data analytics and data visualisation that can raise awareness, improve understanding and crucially, inform decisions and drive further change.

## Other Comments

None

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