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Information about you

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Publish this response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

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

Yes

Comments:

Improving the consistency and quality of climate change data recorded and reported by public bodies in Scotland should help raise organisational awareness of their carbon emissions, and could encourage organisations take steps to reduce emissions. However, care needs to be taken that public bodies are not discriminated against for the action they may or may not be able to take in response to this information, given the current budget pressures and service constraints facing many public sector organisations.

The Highland Council has consistently sought out additional scrutiny for the monitoring it conducts on carbon emissions relating to its own estate, and held the

Carbon Trust Standard until April 2015. Using the powers outlined in the Climate Change (Scotland) Act 2009 to improve climate change reporting could provide public bodies with a consistent framework and reporting structure that provides individual organisations and the Scottish Government with increased confidence in the data they are providing. This may lead to increased organisational support for tackling carbon emissions and engaging with climate change issues, provided there are sufficient resources to do so.

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

Yes

Comments:

Although answering yes to this question, there are a number of caveats necessary. Standardised reporting has the potential to improve the consistency of climate change information reported by the public sector. However, without comprehensive additional guidance on the specific methodologies needed to collect the different types of data required, and a strong internal (and possibly external) verification or auditing process there are still likely to be inconsistencies, even with the use of a standardised template.

The variation in resources allocated to monitoring and acting on climate change information by the public sector major players will inevitably cause variation in the type, quantity and quality of information provided by different organisations. In order to minimise this variation, a set of minimum acceptable quality standards needs to be developed, and organisations need to be supported in meeting and exceeding these.

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

No

Comments:

The proposed climate change reporting form is similar to those used when reporting voluntarily to Scotland's Climate Change Declaration, and as such, much of the information requested is currently being reported on.

However, the move to project-based carbon accounting in section 3f is of particular concern as it would require a significant change in how carbon emissions are monitored and reported by The Highland Council, and potentially significant increases in staff time (especially in the first year) to develop systems for recording this information. In many cases, it is difficult to quantify the effect of a particular project on carbon emissions, even though the combined impacts of projects aimed at reducing carbon emissions are shown to be working through reductions in estate emissions. In particular, behaviour change projects, for example addressing energy consumption or staff travel choices are particularly difficult to address on a project basis.

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

Comments:

Six to nine months after the end of the financial year would be an appropriate deadline, provided there is some flexibility to allow for different Council schedules. The timeline listed on SSN's draft guidance document, which suggests committee/Council sign off in September, does not fit our committee schedule (the relevant committee sits in August and November). To meet the October deadline, reports would need to be presented to committee in August, which does not leave enough time to gather all the necessary data. Alternatively the reports could be submitted in October, prior to committee approval in November.

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

Comments:

The Highland Council has been reporting and monitoring its carbon emissions for approximately 10 years, and has allocated resources towards supporting this goal, including a dedicated Climate Change team. However, the current draft of the required reporting template would require a per-project breakdown of carbon emissions reductions projects. Breaking down carbon emissions on a per-project basis may not be feasible, or may require so much additional staff time that it becomes a hindrance. The Highland Council currently records carbon emissions across its estate in accordance with current best practice standards, but does not collect information on a project-specific basis. While there are some projects that would be relatively straight forward to quantify, for example installing energy efficiency measures in a building, other initiatives may be more difficult to assess. Given how projects may impact carbon emissions in multiple ways, it can be difficult to quantify specific impacts. For example initiatives to promote video conferencing may indirectly reduce staff travel, but this may not have been the primary motivation for the activity, and carbon emissions reductions may not be directly attributed to a specific action.

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

Yes

Comments:

The list covers those organisations currently reporting to the various voluntary declarations and it makes sense that either all or none of these organisations be included under the required reporting order.

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

Yes

Comments:

The Highland Council has provided voluntary reports to Scotland's Climate Change Declaration for the past seven years. Given the Council's commitment to climate change issues, if the voluntary information recommended was relatively easy for the Council to collect, and did not strain existing staff resources, it would be provided.

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

In many ways the guidance provided alongside the reporting template will determine whether the main goals for required reporting (improved consistency of data presented to Scottish Government from public bodies) will be achieved. Key areas where detailed guidance is required are on how data quality is assured, outlining specific data requirements, with clear descriptions of what data is preferred and how it should be collected. Guidance is also needed on what data needs to be held for auditing (if any), and on the requirements for internal or external validation to ensure that all data being provided meets the required quality standards.

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

Given the time and effort taken to produce the reports, it would be useful to extract as much information from them as possible, without creating a situation where public bodies are ranked or penalised for action/inaction on certain issues, as these reports do not necessarily capture the full circumstances present in an organisation and their capacity to take action on climate change issues.

As noted by COSLA, public sector emissions account for only 1.5% of Scotland's total emissions, and while it is important for the public sector to embrace its leadership role it is important to keep this action in perspective.

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

It needs to be made clear that the climate change public bodies duties outlined in the Climate Change (Scotland) Act 2009 only require major players to provide information on the carbon emissions arising from their estate, and they are under no obligation to take action on any of the information arising from these reports.

Action to penalise public bodies for not complying with mandatory reporting could create a negative culture around climate change issues and harm engagement. It would be better to focus on the positive steps that can be taken from a solid understanding of organisations carbon emissions, and to support organisations in developing sufficient capacity to ensure that all major players are able to comply with the required reporting duties.

Reporting from a Local Authority requires the co-ordination of data and information from many different Council Services, with each Service having varying priorities. Introducing consequences for non-compliance could damage inter-department relationships, and hamper future efforts to reduce carbon emissions and to report effectively.

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

Yes, peer to peer

Comments:

Independent verification is considered the 'gold standard', however there are significant cost implications for this kind of verification. The Highland Council welcomes, and has always sought external scrutiny of its carbon emissions, but does not have the resources to fund external independent verification. Internally, carbon emissions are verified by officers and by elected Members when reports are presented to the Council. Peer to peer verification has great potential, given the growing network of skilled professionals at public bodies across Scotland. However, there may be significant time commitments that would need to be factored in for staff, and organisations would need to agree to staff time being used in this way.

The majority of the Council's carbon emissions are audited under the Carbon Reduction Commitment Energy Efficiency Scheme (CRC scheme). This includes a stringent internal auditing process, as well as external auditing from SEPA. Given that 70-80% of the Council's carbon emissions are audited under this process, it is important that we do not duplicate effort for a comparatively small increase in the areas under scrutiny.

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

Yes

Comments:

The Highland Council has submitted yearly reports to SSN and has always been happy for these to be available online.

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

The Council has its own internal requirements for reporting on annual carbon emissions, which cover similar areas to those covered in the draft order. This means the time spent explicitly on producing a report in accordance with the draft order would be reduced, assuming these internal reporting requirements remain in place. The required reporting report would not replace the existing internal reports, and both would continue to need to be produced.

If the Council was to produce all the data exclusively for this report, the time taken would equate to 15-20 hours of staff time for collection, collation and analysis

of the data, and additional information required in the report. SSN estimate that the entire report can be completed and finalised in approximately 20 hours (as detailed in the draft guidance document), but experience has shown this to be an underestimate, as while data collection and the bulk of the report writing can be done in that time, there is additional staff time taken up with internal co-ordination, review and verification processes, as well as presenting the final reports to Council committees. This easily takes an additional 20+ hours of staff time, and possible 40+ hours if staff time taken for preparing and presenting committee papers is included.

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

Comments:

There could be indirect impacts on business or the third sector if public bodies choose to partner with external organisations to reduce their carbon emissions as a result of the information provided by required reporting. Additional impacts could come from the use of consultants to prepare or validate reports being produced, which could cause problems with consultant availability, given that all 150 organisations will be working to the same reporting timescales.

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

If so, please comment.:

The policy proposals in the draft Order are unlikely to have a negative impact on these equalities issues. However, it should be noted that improved action by the public sector on climate change should have positive effects, and there will be a need for public sector climate change policy initiatives to be checked for equalities impacts on a case-by-case basis.

Consultation Response Please add any consultations views here.

Additional comments: