Transform Scotland
Draft Climate Change Plan: Evidence to the ECCLR Committee
Transport Emissions from the Public Sector
8 February 2017

1. Introduction
Transform Scotland welcomes the opportunity to give evidence to the ECCLR Committee on the draft third Climate Change Plan (CCP). The CCP marks an important point in Scotland's journey to a low carbon economy and sets ambitious targets for carbon reduction over the next 15 years. As the second largest emissions source, tackling transport emissions is vital to meeting our climate change targets. Making transport more sustainable in Scotland is vital to help meet our climate change targets, as well as helping to tackle inequalities and promote sustainable economic growth.

This evidence paper focuses specifically on transport emissions from the public sector. We have separately submitted evidence to the Rural Economy and Connectivity Committee, which focuses on all aspects of emissions from the transport sector.

With transport soon to become the largest source of emissions in Scotland, significant progress is unlikely to be made in reducing emissions from the Scottish public sector unless Public Bodies take serious efforts to reduce their transport emissions. Given that Scotland's Public Bodies can play an influential role in engaging across Scottish society on climate change issues, it is crucial that they adopt a position of leadership in the delivery of Scotland's climate change ambitions.

2. Historic carbon emissions from the transport sector
As acknowledged in the draft CCP, very little progress has been made in tackling emissions from transport.[1] Transport emissions in Scotland have fallen by only 2% since 1990,[2] which, along with agriculture, falls far short of the emission reductions made in other sectors. Transport now accounts for 28% of national emissions[3] and is on course to be the largest source emissions in the near future.

3. Background to transport and the public sector

3.1 The role of the public sector in Scottish society
Almost one quarter of Scotland's population works in the public sector (23.5% or 580,400 people). As such, a focus on Public Bodies represents a very large proportion of the Scottish population. Furthermore, given that the Scottish Government has substantial responsibility over the work of the Public Bodies, we believe that this represents a great opportunity for the Government to drive emissions reductions in this sector.

3.2 Public Bodies Climate Change Duties
Scotland's Public Bodies have a responsibility to reduce carbon emissions under the Public Bodies Climate Change Duties, as set out in the Climate Change (Scotland) Act 2009. All Public Bodies in Scotland are required to submit annual reports on their progress on reducing carbon emissions, with the first set of reports due to be published in spring 2017.

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[1] Scottish Government (2017) Draft Climate Change Plan, page 7. Available at http://www.gov.scot/Resource/0051/00513102.pdf
[2] Transport Scotland (2015). Scottish Transport Statistics. Available at http://www.transport.gov.scot/statistics/scottish-transport-statistics-all-editions
[3] Scottish Government (2017) Draft Climate Change Plan. Available at http://www.gov.scot/Resource/0051/00513102.pdf

4. Reducing transport emissions from the public sector

4.1 Progress to date in reducing Public Bodies' transport emissions

To date, no data has been published by the Scottish Government showing the progress that Public Bodies have made in reducing carbon emissions from transport. Transform Scotland's 2013 report '*Doing Their Duty*'[4] investigated the progress made by the public sector in reducing emissions by use of Freedom of Information requests. The report focused on three major sources of transport emissions in the public sector: Transport choices for commuting and business travel; Emissions standards of the vehicle fleet; And the use of aviation for business travel.

4.1.1 Workplace Travel Plans

A Travel Plan seeks to reduce the need to travel and combat over-dependence on cars by promoting alternatives to single occupancy vehicle use. It is a package of measures designed and aimed at encouraging and enabling sustainable travel through walking, cycling, public transport, car-sharing and the use of technology (e.g. conference calls). Research carried out in 2009 for the Scottish Government found that *single largest* widespread implementation of Travel Plans would provide the contribution in the transport sector to emissions reduction, and that it would come at the second-lowest cost of all of the measures that the study analysed.[5] Transform Scotland's 2013 report investigated the use of travel planning in Scotland's Public Bodies. Our research indicated that in 2013, at least 60% of Scotland's Public Bodies did not have a Travel Plan in place within their organisation. Of the bodies which did have Travel Plans in place, less than 25% of these were deemed to be adhering to 'good practice' in their implementation.

4.1.2 Ultra Low Emission Vehicles (ULEVs) and electric vehicles

Whilst reducing the need for travel should be prioritised before focusing on technological change, the use of vehicles for some Public Bodies will remain unavoidable. Reducing emissions from the vehicle fleet is therefore one of the most important means of tackling carbon emissions from the public sector. Transform Scotland's 2013 report surveyed Scotland's Public Bodies on the Vehicle Excise Duty (VED) classification of their vehicle fleets. The results showed that only 17% of the vehicle fleet in the public sector were classed as Band A (i.e. <100 g/km), with the most common vehicle type falling under Band I (i.e. 176-185 g/km). The report also showed that the most common Band of vehicle purchased was Band A and that 48% of new cars were either Band A or B. Whilst this is a positive step, it is difficult to attribute this change to Public Bodies' desire to reduce carbon emissions; rather, this reflects reduced emissions across the vehicle fleet due to EU vehicle emissions standards.

4.1.3 Public sector flights for business travel

Aviation is the most carbon-intensive form of transport and is the largest growing source of emissions in transport in Scotland.[6] Flights taken by public sector employees to other areas of the United Kingdom, particularly London, account for a large source of emissions from public sector transport. Transform Scotland's 2013 report found that 74% of journeys from the Central Belt to London in 2012 by Public Bodies were made by plane, with only 26% of journeys made by train. Rail services from Edinburgh/Glasgow offer a 68% reduction in carbon emissions in comparison to the same journey taken by plane. The use of aviation over rail is fundamentally incompatible with the Scottish Government's commitment to, and promotion of, sustainable transport.

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[4] Transform Scotland (2013). http://transformscotland.org.uk/wp/wp-content/uploads/2014/12/Doing-Their-Duty.pdf

[5] Scottish Government (2009). Mitigating Transport's Climate Change Impact in Scotland: Assessment of Policy Options.

[6] Scottish Transport Statistics (2015). Available at http://www.transport.gov.scot/statistics/scottish-transport-statistics-all-editions

5. Impact of the CCP in reducing public sector transport emissions

5.1 Reducing journeys made by car by Public Bodies

There are no Policies or Proposals which focus on the need to reduce journeys made by car by Public Bodies for commuting to work or for business travel. The continuation of the Smarter Choices Smarter Places (SCSP) programme[7] will help to provide people with Travel Plans and encourage the use of sustainable transport; however, SCSP is only targeted at the general public and is not used within Public Bodies.

5.2 Uptake of ULEVs and electric vehicles

The draft CCP focuses heavily on reducing emissions from vehicles in Scotland, but fails to commit to action to decarbonise the public sector vehicle fleet. A Proposal is put forward stating that the Scottish Government could work to with public sector stakeholders to "*encourages uptake of ULEVs*

".[8] However, as this is only included as a Proposal, rather than a Policy, there is no commitment to implementing a new procurement policy for public sector vehicles. Furthermore, the weak language used in describing this Proposal indicates a high degree of uncertainty as to whether this proposed procurement policy will actually be implemented.

5.3 Reducing flights made for business travel

There are no Policies or Proposals in the draft CCP which put responsibility on the Scottish Government or Public Bodies to reduce the number of journeys taken by plane or to limit emissions from aviation. Reducing the number of journeys made by plane is a highly effective means of reducing carbon emissions in the public sector as well as on a national scale. This represents a major shortcoming of the draft CCP.

6. Recommendations

6.1 Implement a Travel Plan in every Public Body by 2018 which incentivises walking, cycling and public transport

In order to reduce the emissions associated with commuting and business travel in the public sector, it is necessary for every Public Body to have in place a Travel Plan policy which incentivises the use of walking, cycling, public transport and shared transportation, and minimises use of single occupancy private car and aviation. All Public Bodies should also be required to monitor, evaluate and report their business travel emissions and the progress made on reducing these emissions.

6.2 Only ULEVs or electric vehicles in the public sector transport fleet by 2025

It is necessary to accelerate the procurement of ULEVs and electric vehicles in the public sector in the coming years. By 2025, all Public Bodies should aim to have their fleet comprised of only ULEVs or electric vehicles, with reasonable exceptions (e.g. emergency vehicles). This allows a period of time to phase out the use of high-emission petrol and diesel vehicles. To speed up decarbonisation in transport, a procurement policy should be put in place to ensure that only ULEVs or electric vehicles are purchased by Public Bodies from 2018.

[7] Scottish Government (2017). Draft Climate Change Plan - Transport, page 87. http://www.gov.scot/Resource/0051/00513102.pdf

[8] Scottish Government (2017). Draft Climate Change Plan - Transport, page 79. http://www.gov.scot/Resource/0051/00513102.pdf

6.4 Replace all journeys made by plane by Public Bodies within the UK with rail travel

In order to reduce emissions associated with business travel in the public sector, it is paramount that robust plans are put in place to rule out flights made by public sector employees to other regions of the UK, with journeys instead made by rail. In exceptional circumstances where flights are granted, permission should be signed off by the Director or Chief Executive of the Public Body.

7. Co-benefits of implementing recommendations

7.1 Public health

Implementing Travel Plans and supporting public sector employees to use sustainable transport could have huge benefits for public health. Encouraging travel on foot or by bike would help individuals stay fit and reduce the risk of ill health. Even using public transport has health benefits, as users of public transport typically walk to the start point of their journey.

7.2 Air quality

Vehicles are the leading cause of poor air quality in towns and cities,[9] which is thought to be responsible for over 2000 deaths a year in Scotland.[10] An increased uptake of ULEVs and electric vehicles would help to alleviate air pollution in built up areas, bringing benefits for public health.

7.3 Reduced public expenditure

Air travel remains a much more expensive means of travel than rail. An analysis of air ticket prices in 2012 found that for 81% of flights between Edinburgh and London, a cheaper ticket was available when travelling by train.[11] The Scottish Government's decision to replace one-third of flights with rail between 2009 and 2014 resulted in a saving of over £500,000 in public expenditure.[12]

7.4 Workplace productivity

Rail journeys also allow people to work whilst travelling, presenting a major productivity benefit for Public Bodies. WiFi is commonplace in first class services on trains and is becoming increasingly common on a wider range of services across the UK, yet is largely unavailable on planes. Rail passengers can enjoy collaborative work in a relaxed environment, which is simply not possible on planes. Our analysis indicates that an equivalent of around £217 is gained in work productivity when journeys are made by train rather than plane.[13]

8. About Transform Scotland

Transform Scotland is the national alliance for sustainable transport. Transform Scotland campaigns for a society where everyone can have their travel needs met within the limits of a transport system that is environmentally sustainable, socially inclusive and economically responsible. We are the only organisation in Scotland making the case for sustainable transport across all modes. We have a membership of sixty organisations across Scotland, including public transport operators, local authorities and sustainable transport voluntary organisations. Transform Scotland is a registered charity, politically independent, science-based and strictly not-for-profit.

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[9] Department of Environment, Food and Rural Affairs (DEFRA) (2017). Causes of air pollution. https://uk-air.defra.gov.uk/air-pollution/causes (accessed 12/1/17)

[10] Friends of the Earth Scotland (2016). Air Pollution in Scotland. www.foe-scotland.org.uk/sites/www.foe-scotland.org.uk/files/Air%20pollution%20in%20Scotlandrevised%20Jan%202016.pdf

[11] Transform Scotland/TRAC (2012). 'Why-Fly?' http://transformscotland.org.uk/what-we-do/campaigns/why-fly/

[12] WWF Scotland (2014). 'One in Five Challenge'. http://www.wwf.org.uk/updates/scottish-government-cuts-flights-carbon-and-costs?_io=6963

[13] Transform Scotland/TRAC (2012). 'Why-Fly?' http://transformscotland.org.uk/what-we-do/campaigns/why-fly/