Response ID ANON-YCUZ-ZWAX-N

Submitted to **The role of Public Sector Bodies in tackling climate change: A Consultation**
Submitted on **2019-12-04 20:04:42**

Part 1: Information and collaboration

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

What additional training, information or guidance do you think Public Sector Bodies need to help them increase their action on climate change?:
We will limit our comments to transport policy matters.

We are not persuaded that further materials need to be provided. In the area of transport, the critical action for Public Bodies to take is to develop, implement and monitor a comprehensive Travel Plan, and there has been ample advice available for Public Bodies to do so available for at least the past two decades. The failure has been not in information available to Public Bodies but rather in the commitment of Public Bodies to take action.

Research carried out for the Scottish Government by Atkins and The University of Aberdeen in 2009 found that “Widespread implementation of travel plans” would provide the single largest 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. It was very clear from this study — still the most comprehensive of its type carried out in Scotland — that a focus on travel planning would provide large emissions reduction at low cost.

Given the scale of the Scottish public sector, it is imperative that the Public Bodies take a leading role in implementing Travel Plans. However, in research we undertook in 2013, we found that at least 60% of Public Bodies had no Travel Plan in place, let alone one that was being actively implemented or monitored. [1] Unfortunately, we would be surprised if there has been much subsequent progress in this matter.

[1] http://transformscotland.org.uk/what-we-do/research/doing-their-duty/

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

What are your views on the proposed structure for the High Ambition Climate Network of Chief Executives and Elected Members?:
No views.

Part 2: Targets and reporting

3 Do you agree that Public Sector Bodies should be required to set targets for when they will achieve zero direct emissions, and for reduced indirect emissions?

Yes

Please explain your answer.:

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

Yes

Please explain your answer.:

5 Do you agree that the details of what Public Sector Bodies are required to report on should be set out in statutory guidance instead of on the face of secondary legislation (otherwise known as an Order)?

Yes

Please explain your answer.:

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

Yes

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

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

Yes

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

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

Is there anything else you think should be added to the reporting duties, or anything else you think should be removed?:
We find the general approach taken rather vague and intangible.

We would prefer an approach which set out rather more concrete items on which Public Bodies should report. In the area of transport, this would include:

* Travel Planning. Whether Public Bodies have adopted Travel Plans, and whether they have effective monitoring in place. Public Bodies should as part of their Travel Plans quantify business travel emissions and should estimate emissions generated by commuter travel.

* Low Emission Vehicles: Whether Public Bodies are making progress in decarbonising their vehicle fleets.

* Travel to London: Whether Public Bodies are using rail rather than air for travel from Scotland to London (in particular Edinburgh-London and Glasgow-London).

We recommend that these items be included in the Statutory Guidance.

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

Yes

Please explain your answer.:

Other comments

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

Please use this space to make any further comments on the role of the public sector in tackling climate change.:
The Scottish Public Bodies have a vast workforce and have a huge influence on society, lifestyles and transport impacts -- so they absolutely can make a big difference.

In her introduction, the Cabinet Secretary paints a picture of progress -- but this is not the case in the transport sector, the largest source of emissions, where there has been no reductions in emissions since 1990. This represents a gross failure, and requires urgent action.

We would make these further remarks:

* All Public Bodies can influence how their staff travel, the location of their facilities and how these are reached by visitors. However, many don't even feature basic sustainable transport information on their websites; this is simple incompetence on behalf of these organisations and merits Ministerial intervention.

* The health service should being play a leading role as it is in its pure self-interest. The health sector Public Bodies should be promoting healthy lifestyles as an alternative to treating the results of unhealthy ones and that very much includes how we all travel, including health service staff and the location of facilities such as hospitals. The costs of health care are soaring and this is a great concern to all -- so this should be self-evident, but at present it clearly isn't.

* Local Authorities are another major player: they have a key role in setting and implementing land use planning policies; that is, what is built and where. This has been one of the biggest failure of the last 50 years and has led to our present car-dominated society. There are many examples from mainland Europe of how to reverse this but we have yet to take these on board in any serious or concerted manner.

* The Education sector should be leading by example in all areas -- teaching a new generation of the mistakes of the past and how to now make and implement changes in the future.

* Visit Scotland. It is badly overdue for this organisation to stop promoting car-based tourism around Scotland, and instead prioritise communicating the benefits of the sustainable transport modes in tourism.

These are some of the big players -- but all can and must change their ways. There is no shortage of government guidance on the correct transport hierarchy but it simply isn't being implemented at either national or local government level.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Transform Scotland

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

Publish response with name

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

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:
Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Very satisfied

Please enter comments here.: