

ANNEX A CONSULTATION QUESTIONNAIRE

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

The powers in the Act give the Scottish Government the ability to require reports to be prepared and to set out the format of those reports. It is agreed that adequate reporting should be undertaken by public bodies. To date, SCRA has prepared annual reports providing information on performance. However, the proposed amendments to the reporting format are expected to increase the organisational resources necessary to comply with the new requirements during a period where resources are being reduced. The proportionality of the information being gathered should be carefully considered in relation to public bodies' core functions.

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

In principle and over time it could be expected that standardised reporting will improve the quality and consistency of information. However, the current "major players" list covers a wide range of public bodies that are at various stages in relation to their climate change duties. Inevitably, more detailed and standardised reporting will highlight those bodies that do not have climate change at the core of their organisational role. To meet the reporting requirements it is anticipated that existing resources will require to be diverted to ensure compliance. At a time of increasingly constrained resources this is likely to be a challenge. The benefits for public sector bodies themselves could be more clearly set out, particularly in terms of how the information is intended to be used. For example if the standardised reporting is intended to identify barriers and carries with it the potential for increased Scottish Government resource to overcome these barriers, this should be made clear.

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)?

Yes

Comments

The policy subjects and questions are relevant and cover a good range of areas. For a number of organisations designated “major players” that do not have climate change and environmental matters firmly embedded in the organisational makeup (particularly organisations whose primary focus of work is not environment related) the additional reporting will require significant additional resources.

It would also seem desirable to ensure that public bodies could meet other reporting requirements through inclusion within a single report. For example the separate duty for reporting on Biodiversity could be included as part of a single report. It would be helpful for the Scottish Government to ensure that these requirements are joined up so far as is possible, both to minimise workload and to ensure that the maximum possible value is extracted from the reports themselves.

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

Comments

The draft order specifies a period of 6 months from the financial year end for submission of reports. Allowing for the resources and internal procedures necessary for compilation of reports, as well as time delays retrieving key data, we consider that a revised period of 9 months from the end of the financial year would be more practical.

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 new reporting requirements are expected to lead to an increased level of time and resources being dedicated by SCRA to meet our climate change/sustainability reporting duty. It is expected that new internal data gathering systems and processes will be required which will divert resources from supporting the delivery of core operational functions.

Question 6: For public sector respondents only:

- **Do you agree with the list of “major players” in Schedule 1 to the draft order?**

No

Comments:

The phrase may be misleading as use of the term “major players” suggests that these are organisations that have environment/climate change at the core of their organisational functions. This would indicate organisations such as SEPA and SNH. Whilst all public sector bodies have a role to play in contributing towards climate change reduction, in a number of cases organisations currently designated as “major players” are unlikely to have major influence or impact.

- **Would you voluntarily provide additional climate change information if recommended by the Scottish Government?**

Yes

Comments

SCRA would seek to respond positively to any such request. As we have noted above, the currently proposed reporting requirement and any additional voluntary information will have significant time and resourcing implications that will impact upon support provided to core operational functions.

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

Comments

For public bodies, like SCRA, that do not have climate change/environmental work at the core of their statutory functions, additional guidance and support will be essential.

In terms of specifics, guidance on how to extrapolate information where exact information isn't available, for example, water use where there is no water meter or electricity use in shared premises. For a diverse estate such as SCRA's, correctly calculating this is critical to providing accurate figures.

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

Comments

Any monitoring undertaken of the reports should be accompanied by extensive support and assistance to enable less experienced organisations to develop and improve over time. A monitoring approach based on encouragement, support and the sharing of good practice rather than penalisation would be welcomed.

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

Comments

Financial penalties for non-compliance are not considered appropriate, particularly for less developed organisations for whom meeting the reporting requirements will involve the commitment of significant resources. The use of any form of “league table” is also not considered appropriate and the focus should be on supporting organisations to fulfil the duties.

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

Yes, independent Yes, internal Yes, peer to peer Not Needed

Comments

Validation of reports prior to submission will reduce the time available for preparation of the report. SCRA has no experience of this process although it is anticipated that it will necessitate further commitment of time and resources.

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

N/A

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 consultation document suggests 20 hours per organisation to complete the report. Given the current level of development of SCRA’s climate change systems and processes, it is expected that the time commitment to produce the report will significantly exceed this estimate and involve contributions from various individuals and parts of the organisation to bring the information together in a meaningful and useable form.

Question 13: With reference to the draft BRIA, do you think that the policy proposal presented may impact on business, the third sector (voluntary) or any other relevant areas?

Comments

Unable to comment

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.

Comments

Unable to comment

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