

## Response ID ANON-VRHS-FWFP-P

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### Information about you

#### Contact details and publishing consent:

Organisation/Group

**Organisation/Group name\*:**

Transform Scotland

**Organisation/Group address\*\*:**

5 Rose Street  
Edinburgh

**Organisation/Group postcode\*\*:**

EH2 2PR

**Organisation/Group contact name\*:**

John Webster

**Organisation/Group contact email\*:**

john.webster@ytransformscotland.org.uk

Third sector / equality organisation

**Organisation/Group type 'other':**

**Title\*:**

N/A

**Forename or initials\*:**

N/A

**Surname\*:**

N/A

**Full postal address\*\*:**

**Postcode\*\*:**

N/A

**Email address\*:**

na@example.com

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**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

### PAGE ONE

**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:**

Reporting is an essential element in monitoring that emission reductions are being achieved.

**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:**

Experience from other statutory reporting (water quality etc.) demonstrates that it is essential that all bodies report against strictly defined criteria to ensure like-for-like comparison.

**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:**

Schedule 2 is a very detailed and comprehensive document and should ensure that all bodies are able to track performance over a wide range of issues.

However, Section 2(f) of Schedule 2 should be amended to include 'Staff Travel'.

**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 months after the end of the reporting period.

**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:**

Not applicable

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

Not Answered

**Comments:**

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

Not Answered

**Comments:**

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

**Comments:**

The technical nature of many of the reporting issues will probably require a number of the larger public bodies to appoint an appropriately qualified member of staff to collate and interpret the data correctly and accurately.

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

**Comments:**

Reports should be monitored and audited by an external organisation, such as an environmental consultancy, to ensure that data is correctly presented and reported and that the source of the data can be audited to ensure reliable reporting.

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

**Comments:**

In the end, repeated failure (more than twice in succession), to comply will most likely be due to lack of direction from the top so the Chief Executive should be held accountable and replaced if failing to perform against this very important area of environmental concern.

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

Yes, independent

**Comments:**

Reports should be monitored and audited by an external organisation, such as an environmental consultancy.

**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?**

Not Answered

**Comments:**

Not applicable.

**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:**

Not applicable.

**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:**

The policy proposal will allow third sector to obtain reliable information on organisational performance towards meeting the targets.

**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.:**

Cannot see how it should impact in this way.

**Consultation Response Please add any consultations views here.**

**Additional comments:**

Transform Scotland is very supportive of the introduction of statutory reporting and called for this some time ago in an earlier response. We think climate change is one of the most significant environmental issues in need of urgent international action and are pleased to see the Scottish Government taking the lead with this initiative as a way of making progress.