

Draft Climate Change Plan

The draft third report on policies and proposals 2017- 2032

Keep Scotland Beautiful – Response to call for evidence
February 2017

1. Introduction

The Scottish environmental charity, Keep Scotland Beautiful campaigns, acts and educates on a range of local, national and global environmental issues to change behaviour and improve the quality of people's lives and the places they care for.

We work with organisations, communities and individuals to help reduce carbon emissions, improve local areas and adapt to the impacts of climate change. We also provide advice and support to help create and maintain cleaner, safer and healthier local environments where people and communities can thrive. We are committed to making Scotland clean, green and more sustainable.

We welcome the opportunity to comment on the Scottish Government's draft Climate Change Plan and to contribute to the discussion and debate that will inform the final plan.

We have formulated our response around six areas which we believe are important to focus on if we are to achieve Scotland's national and international climate change commitments:

- Leadership
- Legislation
- Behaviour and culture change
- Support programmes
- Reporting, scrutiny and accountability
- Investment, innovation and resources

In seeking to provide an effective response to the call for evidence we have outlined a number of general comments on the draft plan, and highlighted a number of key points in relation to the six areas identified above.

2. General comments

Pathway to 2032

Keep Scotland Beautiful welcomes the publication of the draft Climate Change Plan. We are generally supportive of the ambition and direction of travel set out in it.

We recognise that the structure of the draft plan is a significant step forward from previous Reports on Policies and Proposals.

Although we welcome the publication of the draft plan and its ambition, it is important to be realistic regarding the deliverability of policies and proposals identified, the timescales within which they can be achieved and political and organisational commitment that will be required nationally and locally to turn the direction of travel outlined in the draft plan into practical action. We believe that more detail should be provided and included within the policies and proposals so that the ambition can be achieved within the timescales identified.

Delivering the draft Climate Change Plan and the policies and proposals it contains, will be a challenge not only for the Scottish Government but for all those engaged in tackling climate change. It is, therefore, important that there is clarity on how the plan is going to be delivered both at a strategic level and in individual sectors.

Delivering on the ambition

Keep Scotland Beautiful welcomes the commitment in the plan to actions aimed at generating tangible progress across sectors in the short to medium term, while seeking to create the right conditions for long term, sustainable change. However, we are concerned that those areas (agriculture and land use, transport and heating) flagged up by the UK Committee on Climate Change¹ in September 2016 as priorities for action appear to be the least developed sections of the plan.

¹ UK Committee on Climate Change, *Reducing emissions in Scotland – 2016 progress report*, September 2015

We support the views expressed in evidence by the Sustainable Scotland Network in relation to the development of the draft plan. We also broadly agree with the views expressed by Stop Climate Chaos Scotland (SCCS) in evidence submitted to various parliamentary committees regarding the individual sectors within the draft plan, and the coalition's suggestions on how to address some of the challenges the draft plan poses.

3. Areas for action

a. Leadership

Keep Scotland Beautiful recognises that the vision outlined in the draft Climate Change Plan is one that promotes Scotland as a strong and innovative climate leader, and one that takes its climate change responsibilities very seriously.

Embedding the plan will require clear, consistent and visible leadership across all sectors and organisations in Scotland. Leaders in private, public and voluntary sector organisations need to demonstrate commitment and action on climate change.

We believe there is a need for the Scottish Government to go further to provide strategic leadership and direction within and across sectors to ensure the Climate Change Plan is successfully implemented, in particular by further integrating climate change priorities within agency and departmental priorities.

Through the Sustainable Scotland Network, there is a key role for the Scottish Government to play in continuing to bring focus to the development and implementation of public sector leadership capacity building in line with the needs of the plan.

We welcome the commitment from the Scottish Government that it will, over the course of the plan and beyond, *“continue to work with local government to empower councils to meet local challenges so that they can continue to make a valued contribution to Scottish targets, policies and proposals”*².

Community Planning Partnerships and local authorities have a key role to play in helping to drive action on the plan at both a regional and local level, and in supporting community leadership and action on climate change. It would be helpful for the Scottish Government to further clarify the role of Community Planning Partnerships, and how the relevant policies and proposals identified in the draft plan should be reflected in Local Outcome Improvement Plans in the final version of the plan.

We believe that local action on climate change needs to go beyond currently funded programmes such as the Climate Challenge Fund. The provisions outlined in the Community Empowerment (Scotland) Act 2015 provide an excellent platform for broader action to be encouraged and supported.

The draft plan proposes a new governance body which will oversee the monitoring and evaluation framework of the plan, and its policies and proposals and resultant actions over time. However, very little information is given about this body and it is unclear whether it will supersede any other existing groups or structures that are already in place. It would be helpful for the Scottish Government to provide further details about this governance body, especially in relation to its authority and ability to request or compel action if there is a lack of progress.

Finally, in terms of timescales there needs to be increased recognition of the role that young people will have to play in facilitating a transition to a low carbon Scotland.

We would encourage the Scottish Government to continue to invest in young people as future climate leaders. Through the Eco-Schools Scotland programme we facilitate student led environmental management of schools, ensuing awareness of climate adaptation, mitigation, resilience and justice are all embedded in holistic learning. We look forward to continuing to work with the Scottish Government to ensure young people are inspired, engaged and empowered to help lead Scotland towards becoming a low carbon country.

b. Legislation

Keep Scotland Beautiful believes that climate change needs to be included as a strategic factor which frames and informs all new legislation agreed by the Scottish Parliament.

² Scottish Government, *Draft Climate Change Plan - the draft Third Report on Policies and Proposals 2017-2032*, 2017, p.14

The Scottish Parliament should ensure that all new legislation is assessed for its climate change impacts and vulnerabilities, and that all new legislation is designed to maximise its contribution to addressing climate change mitigation and adaptation, especially in the context of the emissions targets outlined in the Climate Change Plan.

We are aware that the draft plan is a result of cross-governmental collaboration. We urge the Scottish Government to continue this approach and ensure that strategic, coordinated and integrated action from all government departments and agencies in relation to the plan and, more broadly climate change, continues into the future.

With a new Climate Change Plan in place, work will be required to coordinate awareness and action across sectors in line with the plan. We would like clarity on how the new governance body will work with all stakeholders to align efforts across all sectors to ensure a consistent, well-coordinated and multi-stakeholder approach towards the implementation of the plan.

c. Behaviour and cultural change

Keep Scotland Beautiful recognises that for any nation to be effective in addressing climate change, climate-aware social, cultural and behavioural norms need to be fostered and embedded.

Community led action has a vital role to play in achieving behavioural and cultural change as well as the wider vision set out in the Climate Change Plan. Communities across Scotland are being supported via the climate Challenge Fund to take action on climate change. This creates an opportunity to align strategic activities by agencies to community action which will increase the impact of both the communities and agencies work.

We welcome the Scottish Government's focus on behaviour change and, in particular, the use of ISM in the draft Climate Change Plan. We use the ISM framework in our behaviours work with community groups, public sector organisations, and businesses, and we, would welcome the opportunity to continue to work with the Scottish Government and others to use ISM in our climate change policy and practice.

The Scottish Government and others should continue to invest in programmes and initiatives designed to help shift social and cultural norms within key parts of Scottish society. Culture and behavioural aspects of Scottish Government's climate change policy should be given higher prominence and be acknowledged as a mandatory factor when developing all policy initiatives.

d. Support programmes

To take action on climate change, people, communities and organisations need help making complex issues simple. The role of support programmes is essential to delivering the ambition outlined in the draft plan. We welcome the recognition in the draft plan that, although the primary focus of the policies and proposals developed are largely aimed at those who participate in activities in the relevant sectors, the choices of communities and individuals have a role to play in meeting emissions reduction targets.

The Scottish Government and others should continue to invest in support programmes for different sectors including:

- Climate Challenge Fund for communities
- Eco-Schools for primary and secondary schools
- Sustainable Scotland Network for public sector organisations

Keep Scotland Beautiful recognises that in the current financial climate resources are limited and there is a need to prioritise. Consideration needs to be given to broadening out action at a local level. This action needs to be driven by public sector (Community Planning Partnerships and local authorities) and by communities beyond currently funded activities.

There is also a need for the Scottish Government to continue to move climate change discussions beyond those stakeholders currently engaged, e.g. academics, industry, and practitioners, to promote wider understanding of the impacts and ensure there is effective engagement with the general public.

We recognise the importance of the Climate Conversations that took place during the development of the draft plan in engaging the public in the discussion, and welcome the Scottish Government's commitment to continuing these conversations through local groups across Scotland. Through the Climate Challenge Fund and our other community projects and initiatives, we look forward to providing a platform for community groups across Scotland to engage in these discussion. This will include encouraging those already engaged in and taking action on environmental quality issues to consider integrating climate change issues into their actions.

e. Reporting, scrutiny and accountability

Keep Scotland Beautiful recognises that legislation and policy must be supported by commensurate reporting, scrutiny and accountability methods and mechanisms. We, therefore, welcome the proposed monitoring and evaluation framework contained in the draft Climate Change Plan as an important step forward.

However, the draft plan does not clearly explain how each policy or policy outcome contributes towards the overall carbon emissions targets. The plan should be amended to ensure every policy outcome is measurable with clear expectations on outputs, milestones and outcomes.

It would also be useful to understand how plan sits in the context of wider discussions around the National Performance Framework, and the Scottish Government's commitment to the Sustainable Development Goals.

It is important that existing reporting arrangements do not become an end in themselves but are rather seen as an opportunity to: identify and share leading practice within and across sectors; encourage peer support; act as a catalyst to climate change; and to improve performance.

Through the Sustainable Scotland Network, we look forward to working with the Scottish Government to mature and align the Public Bodies Climate Change Duties reporting with the proposed monitoring framework contained in the draft plan.

f. Investment, innovation and resources

In order to deliver on the ambition and range of policies being proposed in the draft Climate Change Plan, it must be supported by commensurate investment of financial, human and material resources.

Keep Scotland Beautiful believes that climate change policy implementation will require the scaling up of specific funding streams that target climate change activity, as well as directing other investments to ensure they deliver what is needed for the plan.

We also believe that meeting the emissions targets set out in the plan requires divestment of resources from activities that are damaging to climate change mitigation and adaptation, and redirection of investment to pro-climate, low carbon and climate resilience activities.

It is important that any debate about resources does not become focused solely on the identification of new public funding but rather looks creatively at how resources (financial, human and material) can be shared across sectors. For example, consideration needs to also be given to how the resources of the private sector can be more effectively harnessed, for example through Corporate Social Responsibility (CSR), to support the delivery of the plan. We have strong evidence and experience of successfully working with private sector organisations to further their CSR objectives.

4. Conclusion

Keep Scotland Beautiful is supportive of the ambition and direction of travel set out in the draft Climate Change Plan. The draft plan is an important step in the right direction, however, given the scope and scale of the challenge of climate change, and the wide range of policies and proposals encompassed in the plan, we recognise that there are some areas that require further work.

We remain committed to playing our part in supporting international and national efforts to tackle climate change, and look forward to engaging further with the Scottish Government on the Climate Change Plan in light of both the parliamentary scrutiny and written evidence that it receives.

We can support the achievement of Scotland's ambition by translating this into community action and encouraging participation at a local level.