



Citizens Advice Scotland
Broadside
2 Powderhall Road
Edinburgh, EH7 4GB

0131 550 1000
CFUenergy@cas.org.uk
www.cas.org.uk

CAS Response to the Scottish Government's Consultation on the Role of Public Sector Bodies in Tackling Climate Change

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Who we are

The policy teams at Citizens Advice Scotland use research and evidence to put people at the heart of policy and regulation in the energy, post and water sectors in Scotland. We work with government, regulators and business to put consumers first, designing policy and practice around their needs and aspirations. We aim to represent the views of different consumer groups using evidence of consumer views and supporting research wherever possible.

Citizens Advice Network in Scotland

Citizens Advice Scotland (CAS), our 59 member Citizen Advice Bureaux (CAB) and the Extra Help Unit, form Scotland's largest independent advice network. Advice provided by our service is free, independent, confidential, impartial and available to everyone. Our self-help website Advice for Scotland provides information on rights and helps people solve their problems.

In 2017-18 the Citizens Advice Service network helped over 295,100 clients and dealt with almost 800,000 advice issues for clients living in Scotland. With support from the network clients had financial gains of almost £142.2 million and our self-help website Advice in Scotland received approximately 3.2 million page views. On energy consumers' issues in particular, we advised on over 41,000 energy-related issues in 2017-18, generating over £1.8m in client financial gain.

Our extensive footprint is important in helping us understand how issues impact locally and nationally across the country and the different impacts that policies can have in different areas.

Overview

Citizens Advice Scotland welcomes the opportunity to respond to this consultation. It is important that we recognise the role that all bodies and sectors have to play in achieving the new and ambitious climate change targets that were passed in the Climate Change Bill in September 2019.

It is, however, imperative that the Scottish Government properly supports public bodies to meet any new duties or roles. It is important that public bodies are able to continue to provide the same (or higher) standard of service to citizens without inadvertently or intentionally passing on the cost of achieving emissions reductions to the very citizens they are trying to support. Several public bodies have a direct link to alleviating fuel poverty, such as health services and local authorities. Local authorities in particular have other regulatory pressures to contend with – such as planning for the new Local Heat and Energy Efficiency Strategies (LHEES) if they become statutory and upgrading their housing stock under EESSH regulations. It is therefore important to ensure that efforts to address climate change do not undermine or run contrary to actions to alleviate fuel poverty. In the same vein, it must be ensured that the net-zero carbon agenda doesn't compromise any of the seven consumer principles of:

- access,
- choice,
- safety,
- information,
- fairness,
- representation,
- redress

Q1. What additional training, information or guidance do you think Public Sector Bodies need to help them increase their action on climate change?

Public Sector Bodies have had a duty to act in a way that helps the Scottish Government achieve its targets since the passing of the Climate Change (Scotland) Act 2009. The difference now is that the Scottish Government has accelerated its targets and made them more ambitious, and this will impact how public bodies have planned to reduce their emissions.

As outlined in the consultation, there are already a good number of toolkits, information sources and fora for public bodies to share knowledge and good practice. There appears however, to be a strong emphasis in the future on supporting those who are "most ambitious". In practice it is likely to be those public bodies who are less engaged who will require more support to get them to the point they need to be. An exercise to assess how all public bodies currently report their carbon emissions and how they experience this in terms of the resources that go into it may be helpful in understanding gaps in support, and filling these gaps efficiently. Furthermore, to ensure accurate reporting and parity across public bodies it is

important that there is consistency in the metrics and protocols used for reporting carbon emissions and activities. One of the conclusions from our 2017 report 'Taking the Temperature',¹ which reviewed the effectiveness of all energy efficiency schemes across Scotland, was that better monitoring and evaluation of impacts was required.

We also anticipate that the Scottish Government will increasingly need to take on the role of facilitator, and centrally fund tasks such as consultancy services and tools for carbon mapping and modelling. Sustainable Scotland Network (SSN) currently hosts a wealth of information which helps bodies with their reporting duties. Given that this proposal is considering ending funding for SSN secretariat there is the risk that this work could be lost, then unnecessarily duplicated in another format when a new support contract is procured. It is imperative that this function is retained.

Key to achieving the net zero target by 2045 is public engagement about climate change and the behavioural changes required at the individual level to reduce emissions. Based on the findings of research into the implications of climate change policy and the Energy Strategy on consumers,² CAS called for a need for a sustained, national education campaign and a decarbonisation routemap that clearly articulates to citizens what changes they will be required to make and how new policies will affect them. These include policies like the target to phase out of diesel cars by 2032 and the introduction of mandatory energy performance standards for all homes by 2040 as currently proposed. The research also identified seven key determinants of behavioural change, and highlighted the need for behavioural change modelling to be incorporated within policy planning. The Scottish Government will therefore need to engage early with the public, and public sector bodies will be central in disseminating the Scottish Government's messages around the climate emergency.

Q2. What are your views on the proposed structure for the High Ambition Climate Network of Chief Executives and Elected Members?

CAS believes that structures such as this can be helpful in driving change, and the members' positions will allow them to consider issues across portfolios, rather than being siloed by department. This should allow them to marry up the priorities, strengths and challenges across portfolios, and make for a more coordinated approach.

However, as previously raised, the proposed model of the High Ambition Climate Network only allows for the most ambitious 15 public bodies in Scotland to take part, and this limit risks excluding the public bodies which may require more support to contribute towards the target. Additionally, Chief Executives will not have the necessary technical knowledge to participate fully, and it is therefore concerning that the funding for the Sustainable Scotland Network

¹ <https://www.cas.org.uk/publications/taking-temperature>

² <https://www.cas.org.uk/publications/changing-behaviour-changing-climate>

secretariat will cease, meaning that one of the key networks for officers working on the ground is likely to stop.

It is unclear from the consultation paper whether the intention alongside ending support for the Sustainable Scotland Network is also to end the Scottish Leaders Forum, the Public Bodies Delivery Group and the Scottish Energy Officers Network. It is imperative that support for all levels of the delivery chain is continued; any changes should seek to clarify the remit and membership of each group; and any changes should improve coordination between these groups. The groups should not seek to be exclusive as the emissions reductions targets are such that all public bodies must be fully involved.

Q3. 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.

CAS believe that targets which are developed by the public bodies themselves may increase the likelihood of the targets being met, as they are more likely to reflect the true environment and capacity within which these bodies work. Nationally imposed targets risk missing out local and organisational nuances, and may also not attract the buy-in of public bodies if the targets are felt to be out of step, or too big a divergence from business as usual. It is likely that a significant number of public bodies will seek to reduce their emissions through decarbonising the heat of its building assets, and so target setting in this area should complement the emerging Local Heat and Energy Efficiency Strategies (LHEES) which are currently being piloted.

We have found through working with public bodies such as Scottish Water, that strong leadership, as well as buy-in across the organisation is key to achieving ambitious targets. It is also important to begin to treat climate-friendly actions and behaviour as business as usual, rather than a "bolt-on". Scottish Water is one public body which appears to be leading the way towards emissions reduction, and indeed it has set itself the target of being net-zero carbon by 2040, five years sooner than the Scottish Government's target of 2045. We believe that commitment to change from senior management and prioritising climate action in their long term strategy are key to Scottish Water being in a position where they are more able to set themselves ambitious targets around emissions and deliver on these.

However, this transition has not been without problems – Scottish Water is bound by legislation to provide the highest quality of service at the lowest reasonable cost, and taking action on climate change inevitably increases operating costs. Unless the Scottish Government takes action to fund these additional actions, the cost is likely to be passed on to the consumer

through water charges. Therefore, we reiterate that action on climate change should not come at an unreasonable cost to consumers, through their bills for example. We believe that the Scottish Government and public bodies must find ways of mitigating this cost to consumers or at least finding fairer, more progressive ways of spreading and socialising the cost so that the least able to pay and vulnerable in society aren't hit the hardest.

Q4. 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.

CAS believes that public bodies should report annually on how they use their resources to contribute to reducing emissions, as these are important to demonstrate the cost of reducing emissions, increasing public transparency and also serve to share best practice. As before, it is important that there is consistency in the metrics and protocols used for reporting carbon emissions and activities to ensure parity. However, there is a balance to be struck as reporting requirements should not be allowed to become so onerous on public bodies so as to constrain them from delivering their usual services. Annual reporting should also be a way of public bodies being able to highlight the barriers they are facing in reducing emissions, and the Scottish Government should have a duty to act on these concerns.

The SSN provided an array of tools to assist public bodies with their reporting duty and it is important that if this is to cease, the new contract must seek to lower the burden on public bodies as much as possible as well as create consistency in reporting.

Q5. 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 / no / don't know

Please explain your answer.

CAS does not take a view on whether the details of what Public Sector Bodies will be required to report on should be set out in primary or secondary legislation.

Q6. 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.

CAS generally agrees with the changes proposed to the list of public sector bodies, as they all seem proportionate. We note the addition of Social Security Scotland to the list and highlight that this body is particularly central for the alleviation of fuel poverty, via the provision of Winter Fuel Payments and Cold Weather Payments.

Q7. Do you agree with our proposals for amending the reporting requirements as set out above?

Yes / no / don't know

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

CAS does not take a view on the proposals for amending the reporting requirements.

Q8. Is there anything else you think should be added to the reporting duties, or anything else you think should be removed?

n/a

Q9. Do you agree that Public Sector Bodies should each make their own report on emissions reductions publicly available?

CAS does not take a view on whether Public Sector Bodies should each make their own report on emissions reductions publicly available.

Please explain your answer.

n/a

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Other comments

None.

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info@cas.org.uk

www.cas.org.uk

Patron: The Princess Royal

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