

Business and Public Sector Engagement Team, 3F South  
Scottish Government  
Victoria Quay  
Edinburgh  
EH6 6QQ

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To whom it may concern,

### **Role of Public Sector Bodies in Tackling Climate Change: Consultation Response**

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy transition. We represent around 260 organisations across the full range of renewable energy technologies in Scotland and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers and community groups, as well as companies throughout the supply chain.

With the Scottish Government having already set world-leading climate change targets, there is an urgent need for co-ordination of activities across the public sector and consistency in the approach to tackling climate change. Given that the public sector is currently responsible for a sizable proportion of Scotland's energy demand and procurement, Public Sector Bodies must take a more active role in paving the way to our net-zero target. We welcome the positive steps already taken by some Public Sector Bodies to enable the use of renewables on their land. Most notably Scottish Water whose use of onsite renewables generate and facilitate over 900GWh of electricity<sup>1</sup> and Forestry and Land Scotland who have enabled the development of over 1GW of wind and hydro power on the land that they manage.<sup>2</sup> Whilst this is encouraging, there is still some distance to travel.

We broadly support the proposals set out in this consultation in relation to Public Sector Bodies' reporting requirements. We are supportive of Public Sector Bodies setting targets for when they will achieve net-zero direct emissions and for reduced indirect emissions, as well as reporting annually on how the use of their resources impacts decarbonisation. Any targets set

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<sup>1</sup> <https://www.scottishwater.co.uk/About-Us/News-and-Views/020518-SW-Energy-Milestone>

<sup>2</sup> <https://forestryandland.gov.scot/what-we-do/renewables>

by Public Sector Bodies should be ambitious and consistent with Scottish Government's own emission reduction targets. Targets should also be reviewed and amended, where appropriate, on a regular basis. This will ensure that each organisation's targets continue to be ambitious and in line with Scottish Government's climate change policies as they inevitably evolve.

Renewable energy is critical to meeting climate change targets, and we believe that every Public Sector Body should be aware of the implications their policy decisions have on the renewables sector, as well as the Scottish Government's Energy Strategy and Climate Change Plan. In addition to the proposed reporting requirements set out in this consultation, we believe that the inputs given by Public Sector Bodies to decision-making processes which have an impact on decarbonisation should also be reported on. For example, local authorities should be obligated to report on the extent to which their decisions in planning either support or block new renewable energy deployment, and bodies such as Scottish Natural Heritage (SNH) and Scottish Environment Protection Agency (SEPA) should report on whether their advice was opposed to or supportive of renewable energy schemes. It is also important that local authorities are required to report on the emission reduction that will result from the delivery of Local Heat and Energy Efficiency Strategies programmes.

We believe that the proposals put forward within this consultation should be further supported by a wider review of Public Sector Bodies' policies in order to assess their alignment with delivering the Scottish Government's climate change targets. For example, it may be more appropriate in a climate emergency that subjective matters which can delay the deployment of renewable energy, such as landscape impact, are made by decision-makers instead of advisory bodies. This would mean that organisations such as SNH would only comment on the effects of development, and not on whether the impact is acceptable or not.

We are also supportive that Public Sector Bodies' individual reports are made publicly available each year. Given the increased public awareness of climate change, this will not only be of interest to stakeholders but also to members of the public and will ensure that organisations can be held accountable. With this in mind, any reports that are made public should be as transparent as possible and easily accessible to all.

If the net-zero target is to be achieved, it is crucial that there are dedicated staff within every Public Sector Body working on tackling climate change. This would mirror the similar successful approach taken through work on zero waste.

It is equally important that these staff are fully supported and have the ability to collaborate with other public sector professionals to ensure there is consistency across all organisations. This function is currently undertaken by the Sustainable Scotland Network (SSN) who have

members from every Public Sector Body in Scotland. Given the scale and urgency of action required to tackle climate change, we are supportive of this function continuing and evolving to support the achievement of the net-zero target.

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,

A handwritten signature in black ink that reads "CDalziel". The signature is written in a cursive, slightly slanted style.

**Cara Dalziel**

**Policy Manager**

**Scottish Renewables**