

## Role of Public Sector Bodies in Tackling Climate Change

### Overview

#### General Comments

Scottish Water is supportive of the proposals set out in the consultation. They provide an opportunity to streamline the range of reporting required of public bodies across carbon and climate change. This should enable more consistent reporting, and a better sense of how the public sector is contributing to goals on greenhouse gas emissions and climate change adaptation.

### Detailed Response

#### Specific Comments

1	<b>What additional training, information or guidance do you think Public Sector Bodies need to help them increase their action on climate change?</b>
	<p>Public bodies are at various levels of maturity in understanding the implications of climate change, emissions across their activities, and their role in mitigation. This is evident from a review of existing public body reports, and suggests further guidance would be helpful across 2 key areas:</p> <p><b>1 – Boundaries</b> A clearer definition of boundaries for emission reporting of public bodies is required. Defining scope 1, 2 and 3, and direct/indirect emissions for public services is important to enable the Scottish Government to have a clear view of the emissions arising from the delivery of public services.</p> <p>This will enable a public body to identify the extent of its influence across which it can seek to take action. Even if it is not in direct control of the emissions, this is important in helping ensure the public sector appropriately influences emissions across the Scottish economy.</p> <p>Some public bodies will be further ahead than others, and a review of the public sector emission boundaries set out in existing reports could help shape further guidance.</p> <p><b>2 – Tools and approaches</b> Emissions accounting is relatively precise for some aspects (direct emissions from fuel use; indirect emissions from electricity use). It is less precise for embodied emissions and can be extremely difficult for scope 3 and capital investment.</p> <p>The public sector invests significantly in Scotland’s infrastructure. There is a</p>

common supply chain across Scotland for many materials (concrete, steel etc), and a greater focus on this may help us to stimulate the market to deliver reduced emissions. Scottish Water has developed some approaches to accounting for this and would be keen to work with others to understand how we could collectively account for and drive emissions reduction across the concrete, steel, aggregates and other materials we use throughout the public sector.

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

We welcome the creation of the High Ambition Climate Network (HACN). Given the scale of the challenge, executive leadership is needed to respond effectively to the strategic direction set by the Government, and to mobilise the public sector to collective action.

The need for partnership working in the public sector also goes deeper, to develop the plans and approaches to the climate emergency, identify shared working opportunities; and to support practical delivery.

We note that the creation of the HACN is matched by withdrawal of support from the Sustainable Scotland Network (SSN). Delivering net zero requires that we adopt sustainability thinking (biodiversity, circular economy, carbon, resource efficiency etc) across public bodies. The SSN provides useful practical support to public bodies, and local authorities in particular, on the sustainability agenda.

Scottish Water joined the steering group of SSN during 2019. The role of the SSN may need to be replicated in due course to support collective action and deliver actions arising from the HACN. The SSN may still continue as an informal network, and we would be interested to discuss further how the Scottish Government might retain a level of involvement.

**3 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 / no / don't know Please explain your answer.**

Yes – we agree in principle, but seek an important clarification of ‘direct emissions’.

We strongly support the ambitions and expectations set by the Scottish Government to achieve net zero by 2045. However, the language “achieve zero direct emissions” illustrates the need for clarity on emission boundaries and the services provided by public bodies (see answer to Q1 above).

Wastewater services include: the collection, treatment and recycling of waste water; including the organic elements of sewage. Biological processes are used to deliver effective treatment, and this liberates greenhouse gases such as methane and nitrous oxide from the breakdown of organic matter and ammonia.

In line with the rest of the water sector in the UK we account for this as “Scope 1 – direct emissions” – i.e. they arise directly from our activities (similar to direct emissions from cattle farming). Such process emissions currently account for around 17% of our emissions, some 40,000 tonnes carbon dioxide equivalents per annum.

Whilst we commit to ceasing direct emissions such as those arising from fuel use, we cannot commit to eliminating direct emissions from the biological breakdown of waste water. We are exploring technologies to reduce and capture these emissions across our asset base, but the fundamental nature of the material we manage means it is extremely unlikely it can be eliminated.

Instead, we commit to delivering “net zero” emissions across all our services, recognising that we will need to do everything possible to eliminate or reduce emissions, but that we may need to explore sequestration (e.g. through investing in natural capital) to balance continuing process emissions.

We expect this issue to be a similar concern for other parts of the public sector, for example municipal biodegradable waste management. Therefore, although the definition of direct and indirect emissions (i.e. Scope 1, 2 & 3) is provided in the consultation, we seek clarity on what is included in the target for ‘zero direct emissions’.

**4 Do you agree that Public Sector Bodies should report annually on how they use their resources to contribute to reducing emissions?**

Yes

Public bodies setting out how they deploy resources to contribute to net zero will provide insight into the challenges and actions across the public sector. For organisations such as Scottish Water, with multi-year business/investment plans, annual reporting will focus on actions within our strategic plan and the annual delivery plan updates presented to Scottish Government.

This is in line with how we presently report under the public body reporting duty.

**5 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

Reporting in this area is a relatively new discipline. As evidenced by our comments above, there are details that require clarification, and more issues may arise as we progress reporting across the public sector. We therefore agree that a more flexible and adaptive approach, rather than legislation, is required.

**6 Do you agree to the proposed changes to the list of Public Sector Bodies that are required to annually report their emissions?**

Yes, Scottish Water agrees with the proposed changes.

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

Yes, Scottish Water generally agrees with the proposed changes, but we seek further information on the Scottish Government’s proposals on section 5 (procurement).

We note the intent to remove this section from the public bodies report on the basis

that the SG will explore how best to align mandatory reporting with the Programme for Government. Procurement across the public sector offers a significant opportunity to stimulate and influence the supply chain in Scotland to innovate and develop low carbon products and technologies. Low carbon building materials would be a key area we would wish to work across the public sector, and we would ask that early consideration is given to how reporting could be amended to support this.

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

Scottish Water has no comment

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

Yes

Whilst we fully support the requirement for public sector bodies to make their reports publicly available, they must also be easily accessible. The current hosting on the SSN website allows easy access to all reports. If these were to be published only on individual organisations' websites, visibility would be reduced and reviewing reports from a number of organisations would become far more time-consuming and difficult.

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**Other Comments**

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