

## Response ID ANON-VRHS-FW93-C

Submitted on 2015-03-25 13:51:06.914639

### Information about you

#### Contact details and publishing consent:

Organisation/Group

**Organisation/Group name\*:**

Nourish Scotland

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

54 Manor Place  
EDINBURGH

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

EH3 7EH

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

Tracey Reilly

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

tracey@nourishscotland.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

Publish this response

**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:**

Yes, Nourish agrees with this proposal.

**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:**

Making reporting compulsory, and in an agreed format, should ensure that information is returned in a reliable, readily comparable format, enabling year on year tracking of organisational performance and trends. It also sends out a useful signal regarding the importance of compliance with climate change duties, both in terms of implementation and reporting.

**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)?**

No

**Comments:**

Nourish is in general agreement with the topics covered and questions asked in the form. However, we are disappointed to see no real recognition of the role that food plays in climate change. Our food system is responsible for producing significant volumes of methane and nitrous oxide emissions as well as Co2. It is generally recognised that around 30% of our emissions come from food-related activities. Emissions arise at every stage of the food chain, from production to harvest, packaging, transport, storage and distribution, cooking and disposal of waste. Many public bodies procure and consume significant volumes of food, especially local authorities (school meals), universities (who have significant staff, student and visitor dining and conference facilities) or for example Historic Scotland or the National Galleries who manage (or contract out) large conference, meeting and cafe operations. Public bodies could be required to report on these aspects under the Procurement heading - especially in the light of the new sustainable procurement duty. Much of the food procured will also have an embedded water footprint. If bodies can be asked to report on emissions and resource use for consumables such as paper, timber and aggregates, then why not food?

**Question 4: What would you consider to be an appropriate deadline date for the annual submission of climate change public bodies duties reports?****Comments:****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:****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:**

As above, guidance could usefully break down elements of public sector spend and consumption relating to food and provide advice on how to calculate emissions, or what information should be required from contractors and suppliers. Guidance under this area will need to mesh with guidance under the sustainable procurement duty, climate change duty and biodiversity targets. In terms of biodiversity it would be useful if the guidance also flagged up the potential for public sector bodies to use their land for nature conservation or food growing purposes.

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

They should be monitored centrally by the Climate Change unit who should report to Ministers/Cabinet on both individual organisation progress and overall trends each year. There may be an argument for making a sample of returns subject to internal audit procedures each year to check that they are being compiled accurately.

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

Failure to comply should be raised with the relevant accountable officer by the responsible Scottish Minister.

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

Yes, internal

**Comments:**

Validation should be internal in the first instance. As above, there may be an argument for applying internal public sector audit principles.

**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:**

**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:**

**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:**

It may impact on the business and third sector where they perform services on behalf of or under contract to the public sector. Public sector will need to provide clear guidance on what information is to be provided by suppliers and contractors.

**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.:**

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

**Additional comments:**