

WRITTEN SUBMISSION FROM NHS GREATER GLASGOW AND CLYDE

Introduction

We welcome the opportunity to contribute to this important proposed legislation and enclose the response from NHS Greater Glasgow and Clyde to the Climate Change (Scotland) Bill consultation.

Within NHSGGC there is recognition that the NHS has a duty to mitigate the impact of climate change by working to reduce our carbon footprint and to act as a truly sustainable organisation across energy use, transport, procurement, waste and building design areas. A recent paper published in the Public Health Journal (P. Cosford/Public Health 123 (2008)e1 – e5) provides a useful commentary on the potential role of the NHS in relation to sustainability and climate change and highlights the role played by the NHS Sustainable Development Unit in supporting change within the NHS in England.

NHS Greater Glasgow and Clyde's Sustainability Planning and Implementation Group seeks to provide leadership for the organisation in matters relating to the environment and sustainability. Comments on the Climate Change Bill have primarily been drawn from this group that comprises representation from Acute Services, Public Health, Procurement, CH(C)Ps and Corporate Policy. It is our view that future legislation should reflect some recognition of the increasing demands of technology growth and legislative demands on services that in themselves can be contrary to the management of a downward trend in commodity usage and energy uptake. Examples of this can be seen in meeting demands for new scanners and the recent zero tolerance requirements for hand washing. There also needs to be some recognition of the age of the NHS estate and its ability, or not in some cases, to be adapted to accommodate alternative energy technology. There should be a clearer linkage of the sustainability agenda to the wider issues of addressing health inequalities. It would be helpful if related policy areas could provide further support for a sustainability strategy in general terms such as addressing poverty and supporting health improvement efforts so as to impact on the demand for NHS services.

The remainder of our response is structured around the identified issues, recognising that not all areas are relevant for us at present e.g. forestry.

We look forward to the publication of the response to this Bill and to the progression of this legislation as a means of supporting change

Q1 The Bill creates a statutory framework for greenhouse gas emissions reductions in Scotland by setting a 50% reduction target for 2030 and an 80% reduction target for 2050.

What are your views on the 2050 target and a 2030 interim target proposed in the Bill?

We welcome the Scottish Government's proposals to aim for a significant reduction in greenhouse gas emissions in order to tackle the adverse effects associated with greenhouse gas emissions. The target of an 80% reduction by 2050 is ambitious – exceeding levels previously set, for example, by the Kyoto or the G8 targets – but achievable if there is support to implement and deliver on the necessary measures. We do recognise however that there is a view that more challenging targets in the future would reduce the risk of reaching the climate tipping points and clarity on whether the targets would include emissions arising from the manufacture of goods and services that are imported to Scotland would be helpful

Q2 The Bill requires that the Scottish Government sets annual targets, in secondary legislation, for Scottish emissions from 2010 to 2050. It is proposed that these annual targets will be set in batches, the first being for the years 2010 to 2022 inclusive.

What are your views on the setting of targets in batches from 2010 to 2022?

We support this proposal but would like to add the suggestion that these batches should match with political or funding cycles.

Q3 The Bill provides that from the year 2020, the annual emissions targets must be set so that each is at least 3% lower than the target for the previous year. Prior to 2020, the Scottish Government has indicated that it intends to set annual targets which build towards delivering emissions reductions of at least 3% each year.

What are your views on this approach or any possible alternative approaches?

Whilst we recognise that an early reduction in emissions is desirable, consideration should be given to the particular challenges relating to rebuild programmes that will affect the trajectory of the average annual reductions that can be achieved.

Q.4 The Bill introduces the concept of a “net Scottish emissions account” as a point of reference against which the target for reducing greenhouse gases can be measured. It is defined as the net Scottish emissions plus or minus any carbon units credited to or debited from the account. Any units purchased may be used to offset Scottish emissions. Any carbon units generated in Scotland and sold to customers outside Scotland, count as emissions made in Scotland.

What are your views on the proposals in the Bill relating to the net Scottish emissions account, and should there be a limit on the number of carbon units which Scotland can purchase?

In order to achieve the ambitious 80% target it will be necessary to be focused on delivering a range of measures that reduce energy consumption, improve energy efficiency, shift energy production to more renewable sources and reduce waste. In addition, efforts to offset emissions will also be required. As a part of this the concept of a net emissions account may be helpful. However, any scheme for crediting or debiting carbon units and offsetting Scottish emissions has to be operated in a transparent manner that ensures that the Scottish emissions cannot simply be exported without being counted against the Scottish emissions reduction targets. There is a need to reduce the risk of creating a system of double counting and to avoid mitigating against a sense of purpose for Scotland to deal with its own emissions problem. We would therefore welcome a limit on the number of units Scotland can purchase. An uncapped purchasing of carbon units could undermine efforts to achieve the 80% net reduction in Scottish emissions and divert resources and attention towards merely exporting Scotland’s emissions elsewhere.

Q5 The Bill defines “Scottish emissions”, in relation to a greenhouse gas, as being emissions of that gas which are attributable to Scotland. The policy memorandum states that “Scottish emissions” are defined as being those greenhouse gases which are emitted in Scotland or which represent the Scottish share of emissions of gases from international aviation and international shipping.

What are your views on this definition of Scottish emissions?

We broadly support this definition but we would welcome further clarity on how the Scottish share of emissions from international shipping and aviation is to be determined. If this excludes emissions embodied in imports of goods and services to Scotland (e.g. of steel or fertiliser) there is a risk that it could provide an incentive for deindustrialisation and could prevent a holistic approach to the emissions that Scotland is responsible for.

Q6 The Scottish Government has indicated that initially it intends to seek independent, expert advice on climate change from the UK Committee on Climate Change. The Scottish Government states in the policy memorandum that if it determines that the UK Committee on Climate Change does not meet all the advice needed for Scotland, the Bill contains provisions which will allow the Scottish Government to establish a Scottish Committee on Climate Change or to designate an existing body to exercise these advisory functions.

What are your views on the Scottish Government’s approach to obtaining independent, expert advice on climate change?

No comments.

Q7 The Bill places duties on the Scottish Government requiring that it reports regularly to the Scottish Parliament on Scotland’s emissions and on the progress being made towards the emissions reduction targets set in the Bill. The Bill sets out details of these reporting requirements.

What are your views on these proposed reporting arrangements?

Effective monitoring and reporting arrangements are crucial for achieving the reduction of greenhouse gases as proposed. We therefore welcome the arrangements set out in the Bill. Monitoring arrangements will have to utilise agreed international measurements to ensure they conform to existing standards and deliver comparable results. We would also like to note that any reporting arrangements will need to be operated in an efficient manner so as not to divert resources away from actual tasks of reducing greenhouse gas emissions and adapting to climate change.

Q8 The Bill contains powers to allow the Scottish Government, by regulations, to impose duties on public bodies in relation to climate change, to issue guidance to those bodies relating to their climate change duties and to require that they report upon the discharge of those duties.

What are your views on this proposal?

Public bodies are a significant part of the Scottish economy and contribute substantially to Scotland's greenhouse gas emissions. We also acknowledge that public bodies are in a position to play a lead role in Scotland with regards to reducing emissions and combating climate change. As such we broadly support the provisions made in Part 4 of the proposed Bill, however, we would welcome further information on the nature of the "climate change duties" the Scottish Government is considering.

Additionally, imposing any specific climate change duties on public bodies will in all likelihood bring with it cost implications for those organisations. It is unlikely that public bodies will be able to meet any substantial additional costs without further support from the Scottish Government. We therefore welcome the commitment expressed in 36 (6) for Scottish ministers to co-operate with relevant public bodies but we would like further clarity on how public bodies may be funded to deliver on any additional climate change duties.

Q9 The Bill places a duty on the Scottish Government to produce a report for Scotland, setting out its objectives in relation to adaptation to climate change, proposals and policies for meeting them and the timescales within which they will be introduced.

What are your views on this proposal?

Adaptation to climate change is an important element in the overall approach to climate change, alongside efforts to reduce emissions and avoid increases in greenhouse gases in the atmosphere. We therefore welcome that the Bill makes specific provisions for the Scottish Government to take action on adaptation to climate change.

Q10 Muirburn is the act of controlled burning of vegetation on open semi-natural habitats such as muir (Scottish word for moor) or moorland, and includes the burning of plants such as gorse, heather and grass. The Bill contains an enabling power to allow the Scottish Government to vary the permitted times during which muirburn may be made where they consider it necessary or expedient to do so in relation to climate change.

What are your views on this proposal?

No comment.

Q11 The Bill will allow modification by order of the functions of the Forestry Commissioners to enable the Forestry Commission in Scotland to play a greater role in tackling climate change. The immediate intent of the Scottish Government is to take forward proposals relating to renewable energy development on the National Forest Estate and the release of capital from the National Forest Estate for woodland creation.

What are your views on this proposal?

No comment.

Q12 The Bill requires the Scottish Government to produce an action plan setting out current and proposed measures to improve the energy efficiency of buildings in Scotland, as well as measures to encourage behavioural change.

What are your views on this proposal?

Energy efficiency is a key aspect of reducing greenhouse gas emissions and we support the proposal to produce an action plan drawing together existing and proposed measures to improve energy efficiency.

Q13 The Bill confers powers on the Scottish Ministers to make regulations providing for the assessment of (a) the energy performance of non-domestic buildings; and (b) emissions of greenhouse gases produced or associated with such buildings. The provisions are enabling in nature and the Policy Memorandum provides further information on the Scottish Government's thinking in this area.

What are your views on this approach?

We support any efforts to make buildings more efficient and reduce the emissions associated with inefficient building design and maintenance. Whilst we therefore welcome the proposals set out in the Bill they raise some questions over the actions that would follow if buildings are found to fall short of accepted standards for energy efficiency. These questions will need to be addressed. We would also like to point out that any assessment process will have to be carried out in a way that is efficient and does not divert resources away from delivering on the wider climate change agenda.

Q14 The Bill places a duty on the Scottish Government to take such steps as it consider appropriate to promote the use of heat from renewable sources. The Scottish Government has indicated this provision will enable it to introduce measures it deems appropriate to incentivise the production of heat from renewable sources.

What are your views on this proposal?

As heating accounts for a significant proportion of energy consumption associated with domestic and non-domestic buildings, supporting the generation of heat from renewable sources is an important step. We therefore welcome the proposals to lend further legislative support to efforts that promote and incentivise heat generation from renewable sources.

Q15 The Bill sets out measures aimed at improving waste and recycling. The Bill gives powers to the Scottish Government to make regulations in the following areas:

**Waste prevention and management plans;
Waste data;
Deposit of recyclable waste;
Procurement of recyclate;
Reduction of packaging;
Deposit and return schemes;
Charges for carrier bags.**

What are your views on these proposals?

We broadly support the proposal made in the Bill but offer some practical challenges in applying a sustainable approach to this area. The main issue is that whilst the Bill recognises the cost of achieving some of these aims it needs to be balanced against the cost of delivery. e.g. specifying a level of recyclates in products may be suitable for some industries and products but have a significant impact if we apply it broad brush. Within NHSGGC we have looked at changing basic products such as paper and pens.

Paper: Switching to a 100% recycled paper product would create a cost pressure of £288k. (extract from recent paper: "If option 2 (recycled paper) is used the cost would increase to £2.28 per ream (total cost £763,800 option 2, a cost pressure of £288,100 = 60.5%).").

Pens: A standard 'Bic' pen is £2.50 per box of 50, 5 pence each. The cheapest pen made from recycled materials (76% recycled) is £7.10 per box of 10, 71p each. This is an increase of 1420%.

These practical examples demonstrate the need to understand the other pressures which may become barriers to achieving climate change if they are not considered and built into the strategy.

Q16 What are your views on the adequacy of the Scottish Government's consultation in advance of publishing the Bill?

No comment.

Q17 Do you have any views on the Strategic Environmental Assessment which was carried out by the Scottish Government out on the consultation proposals?

No comment.

Q18 Does the Bill raise any equalities issues you would wish to highlight?

The measures and actions required to achieve the targets set out in the Bill may be more difficult to implement for those living in poverty, potentially resulting in a widening inequalities gap. This would have implications for a range of other policy areas to take action to address these inequalities.

Q19 Do you have any comments on the impact of the Bill on sustainable development?

We welcome the Bill as a significant step towards greater support for new technologies and behavioural changes in Scotland in relation to sustainable development, for example by encouraging changes in the public and private sector regarding energy use, efficiency and waste.

Q20 Do you have any other comments on the Bill?

See introduction.