

## WRITTEN SUBMISSION FROM NHS NATIONAL SERVICES SCOTLAND

Please find attached the response produced by Health Facilities Scotland in consultation with NHS Boards. This was agreed at the Scottish Engineering Technical Advisory Group at the meeting on the 26 Feb 2009.

This response is supported by all NHS Boards, apart from NHS Greater Glasgow and Clyde and NHS Dumfries and Galloway have provided their own response.

**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?**

If the starting point for NHSScotland's 80% reduction on direct building CO<sub>2</sub> emissions, i.e. energy usage, is the NHS actual usage in 1990, then the 50% and the 80% reduction are feasible. However, as much of the existing NHS buildings stock will still be in use in 2050 there will be a need for a substantial portion of the total NHSScotland energy requirement in 2050 to come from renewables, primarily grid electricity. Will there be sufficient green grid electricity to cover the demand from the NHS? Also, will the Scottish CO<sub>2</sub> figure for electricity generation, instead of the UK figure, be used to calculate an organisations emission, and to take advantage as more and more renewables come on line to accurately reflect the carbon emissions?

**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?**

NHSScotland have had an annual target for nearly 25 years and the current 2% of base year target ends in 2010. NHSScotland will probably continue with an annual target designed to achieve 80% reduction on the 1990 base by 2050. NHSScotland would welcome some milestones however, there needs to be recognition of an organisations past performance. It is likely that different organisation will be starting from different points on their 80% reduction of their respective 1990 emissions. Setting targets should be designed to help all organisations converge on the required 80% reduction and not penalise those that have demonstrated substantial reductions since the 1990 base year. Also organisations should be allowed to follow there own published plans if it can be demonstrated to achieve the 2050 target.

**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?**

Over the last 22 years the NHS in Scotland has reduced energy usage in Hospitals by over 40% which is slightly more than a 2% year on year saving. However this is NHSScotland as a whole, within this some Boards were better or worse and we would propose that any new target would give this flexibility, i.e. the target would be of the overall organisation and not on its individual components. NHSScotland also recognise that there is a need to achieve an average of 2.6% year on year to achieve its 80% reduction by 2050. However, the level of funding provided for new Hospital/HC etc will be crucial to achieve this. Also the reductions of emissions year on year will depend on the phasing of this capital funding, resulting in some years having an above average reduction and vice versa a below average reduction in other years.

**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?**

While the best outcome is for the target to be achieved from actual reductions of greenhouse gases there may be years when this is not possible, e.g. delay in commissioning renewables projects, installing new plant, etc; and being able to purchase carbon units from another country would keep Scotland on target for 2050. However this should only be a temporary measure, sooner or later there would still be a need to make the actual reductions rather than a continually purchasing carbon unit's year on year.

**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?**

Direct emission made in Scotland is fine; however there is not a clear calculation for indirect emissions. International aviation and international shipping can be viewed as both direct and indirect, however Scotland's share of aviation could be viewed as half of each flight that originates in Scotland i.e. aviation is two way traffic and each country could therefore be responsible for ½ the international aviation emission of all flights the land and take off from the airports. Alternatively a simpler method could be to count total aviation fuel supplied to airports within the country. Similarly for shipping it could be the amount of fuel supplied to ports within Scotland. If this is applied worldwide then the chance of double counting would be minimised.

**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?**

As it appears that the Scottish Government could be ahead of the rest of the UK in tackling climate change, this would be the natural progression to ensure Scotland can achieve its target. The recent change by the UK Government to set an 80% target following Scotland lead is just one area where Scotland is leading, therefore if there is a chance that Scotland could be held back, having the ability to form a separate group would provide the best of both worlds.

**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?**

The reporting arrangements are fine; however a fundamental must be to have a consistent method of collecting and reporting emissions. The Public sector could lead by example by using a common monitoring and reporting system to allow progress to the targets be tracked and reported to ensure consistency and accuracy.

**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?**

As mentioned in Q7 it is essential that the Public Bodies lead by example and achieve year on year reduction in emissions. Accurate and consistent reporting is essential to help identify early problems in achieving the target thereby identifying where guidance may be required.

**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?**

It is reasonable to expect SG to be looking at the various risks from increased risk of flooding and severe weather. Changes to building regulation to design to withstand severe weather etc. These need to be considered fairly urgently, amending where necessary planning regulations, building regulations to help manage these risks. Also to draw up a list of areas likely to regular flooding and produce plans and action to mitigate the risk to people and existing properties.

**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?**

The Scottish Government should have this enabling power.

**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?**

NHSScotland would support decisions aimed at increasing carbon capture through increasing the size of Scotland's forests thereby offsetting the amount of carbon dioxide emissions. NHSScotland would also support the increased production of wood chip to ensure economical supplies for Biomass plants for the carbon neutral process of providing local heating and electricity.

**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?**

This is essential; however the starting point is to recognise that a substantial part of the current building stock will still be in use in 2050. New buildings will soon need to be carbon neutral, but the current biggest waste of energy is from poorly insulated buildings. Research is needed to identify methods of raising the insulation level to today's regulations or even better. This needs to be done first before looking to change boilers or install renewables to avoid installing the wrong plant. However, the Public organisations would need financial support to ensure this is done.

**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?**

This is consistent with achieving a level playing field; it is required to ensure an organisation does not simply switch to use renewable energy without meeting a required minimum energy efficiency performance. NHSScotland has for almost 10 years monitored the Comparative Performance of Hospitals against a Best Practice base and this is now being rolled out to all the other small sites, i.e.; health centre, clinics etc. This provides a means to determine the best and worst performing sites enabling resources to be directed more effectively. Ultimately this could be done with EPCs if applied to all buildings and a central register was set up to monitor and report on the energy performance across all organisations.

**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?**

This would be acceptable to NHSScotland, however there must be conditions, all schemes should be vetted to ensure that the building/site that they are intended for meets a certain level of insulation performance, see Q12 comments, or will be brought up to at least today's standard prior to the installation. This will ensure that the size of any equipment installed is minimised and energy performance optimised. Grants or funds provided for renewable heat projects should be sufficient to ensure this is part of the overall project.

**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 recycle;  
Reduction of packaging;  
Deposit and return schemes;  
Charges for carrier bags.**

**What are your views on these proposals?**

Help in all these areas would be welcomed by NHSScotland. NHSScotland collects details from all Boards on the quantities of waste being recycled. Slow progress is being made but help is needed to simulate the whole recycling business. It can still be difficult to get companies to collect all the different types of recycled waste. Setting targets on organisations to gradually recycle a greater proportion of their waste would bring in more competition and more importantly innovation on how to manage a collection system through a products life from purchase to disposal.

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

Fairly comprehensive Bill, although it would have been helpful if there was more details on the carbon emissions of different sectors, and what would be expected of them. For instance, what was the 1990 level of emissions against each sector that the Bill will use as the baseline?

**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?**

There is much technical substance to the Bill and this may lead to discrimination with non-technically minded people. Also the provision of grants and subsidies need to be made available to those with limited financial means, or it might run the risk of supporting only those with the financial and technical know-how.

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

The Bill should be seen as another step on the route of continual improvement to achieve sustainable development.

**Q20 Do you have any other comments on the Bill?**

No.