

Sustainability Plan

Phase 1: 2022-2025

Our route to reducing carbon emissions, understanding our biodiversity impact, and building a sustainable organisation for the future

January 2023

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Version Control

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1.0	Alasdair Dewar	First Version	27/01/2023

1. Purpose and Overview

1.1 Environmental Standards Scotland's (ESS) Sustainability Plan sets out our approach, between now and 2025, to reduce our emissions and contribute to reaching net zero by 2045.

1.2 This Sustainability Plan supports ESS' Strategic Plan and focuses primarily on our guiding principles, in particular Principle 4 – 'We will be open and transparent', as well as contributing to our Strategic Outcome 5 – 'We are an effective and efficient organisation'. In addition, this Sustainability Plan will help ESS deliver its Strategic Plan outcomes of 'Engaging and Communicating Effectively' and 'Measuring Our Impact'.

2. Introduction

2.1 ESS ensures that Scotland's environmental laws are fit for purpose and complied with. As a standards organisation, our Sustainability Plan is intended to be exemplary and ambitious.

2.2 Our Plan is based on requirements to meet the duties for public bodies set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, and we will link our achievements and ambitions to these targets. We will also link sustainability and biodiversity into our ways of working and explore how we can influence and improve outcomes for biodiversity in Scotland.

2.3 The focus for our climate duties is on using the best science available to ensure that we meet net zero by 2045, and on sharing good practice both within the organisation and outside to demonstrate leadership and innovation.

2.4 The aims of this Phase 1 Plan from 2020 to 2025 are to:

- understand our emissions and define a baseline measure. This will support the production of annual reports as per our responsibilities under the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The first report was submitted in November 2022
- understand the sources of emissions so that we can collectively implement sustainable solutions to reduce our emissions
- incorporate sustainability into relevant policies for the organisation
- understand our impact on biodiversity and include practical solutions for improving biodiversity outcomes, where we have the influence to do so

2.5 A revised Plan will be developed and published in 2025 to review progress and set out next steps towards achieving net zero by 2045.

3. Context

Planning

3.1 ESS is an independent body comprising a Board of five members (increasing to seven in 2023) and a staff of 19 (at time of publishing). It formally came into existence on 1 October 2021. As a relatively new body, we are assessing the staffing complement necessary to ensure we are sufficiently resourced to perform our role. We subcontract some aspects of our corporate services management, including payroll and human resources (HR).

3.2 Our office is within shared space at Thistle House, Haymarket, Edinburgh, which is managed by the Scottish Legal Aid Board (SLAB).

3.3 ESS was formed during the COVID-19 pandemic. Since early 2022 our staff have been working to a hybrid working pattern from home or office to varying degrees.

3.4 As an independent public body with an environmental remit, we must take steps to improve our sustainability while ensuring equality and a just transition.

3.5 In shaping the Plan, we have considered how post-pandemic working arrangements can be described and accounted for in terms of sustainability goals. Due to how we work, our main emissions come from commuting, travel, and domestic heating. All our office electricity, gas, water, and waste consumption are calculated and reported by our landlord.

3.6 When calculating our baseline carbon emissions, we assumed: ESS was formed and fully functioning prior to the pandemic; on a full office-based operation within Thistle House; with a core staff of 10 to mirror the actual staffing level at vesting (1 October 2021). After consultation with staff, it seems unlikely we will return to a full office-based operation. However, this Plan will set out indicative targets to reduce our emissions and will be reviewed periodically as our ways of working evolve.

Reporting

3.7 We must report on the duties for public bodies set out in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 each year. This includes the

annual emissions calculations for ESS related to staff travel and commuting, home working energy use and actions to reach net zero by 2045.

3.8 We are also required to report on compliance with our biodiversity duty every three years but will report this every year along with our annual Climate Change reporting requirements as set out above. Using the guidance set out in the Scottish Government's biodiversity reporting duty, we have identified that our organisation does not have a direct impact or link to biodiversity. We are not involved in ownership or management of land, nor are we involved in healthcare, social services, education, or the promotion of sport, recreation, tourism or business development and regeneration.

3.9 Nevertheless, where we cannot have a direct impact, we will strive to be exemplar in how we are contributing, as an organisation and individuals, to benefit biodiversity within Scotland. We will also have an indirect impact on biodiversity, as it is part of the environmental law that ESS oversees. As detailed in our Strategic Plan, biodiversity has been identified as one of our eight environmental topic areas of concern, which ESS will focus on in the coming years.

3.10 We will undertake a proportionate set of activities, set out in the commitments section of this Plan ([Appendix 1](#) and [Appendix 2](#)), which is where we have focused our efforts.

3.11 Note that [Appendix 1](#) covers our commitments up to 2025, where the target is to reduce emissions by 75% by 2030. We will extend and update the commitments out to 2030, to show how we aim to achieve net zero at the end of the 2025 financial year in Phase 2 of our plan, including a forecast trajectory towards 2045.

4. Current Position

Baseline Emission Calculations for the Financial Year 2020/21

4.1 Our 2020/21 baseline assumed that ESS was formed and fully functioning 'pre-COVID' with the same staffing level as at the point of vesting, therefore:

- as per initial planning, a staff base of 10 full-time equivalent staff were required for the setup of ESS as it became established
- it was assumed that 100% office working based at Thistle House was being undertaken, with no hybrid options
- all energy consumption numbers were absorbed into SLAB's emission submissions to avoid duplication in reporting, and are not included within ESS's emissions
- it was estimated that for 225 working days:
 - 20% of staff commuted to work by car (average return journey = 40 miles)
 - 50% of staff commuted to work by bus [average return bus journey = 5 miles, 8 kilometres (km)]
 - 10% of staff commuted to work by train [average return train journey = 40 miles / 64 km (14400 km / annum) + Board travel 1,800 km per year]
 - 20% of staff commuted to work by walking or cycling
 - For business purposes, 10 return flights (1,510 km each) within Europe were taken

4.2 In addition, it should be noted:

- Board and Committee member travel was included in all travel calculations
- ESS floor space within Thistle House equates to 100 metres squared (m²)
- all emissions have been classified as Scope 3 (Other indirect - Emissions arising from the procurement of goods and services from a third party/contractor) as defined in the [Sustainable Scotland Network \(SSN\) Reporting Guidance](#)

Emission Calculations for the Financial Year 2021/22

4.3 Our first reporting year will be 2021/22. To calculate emissions in this reporting year we have made the following assumptions based on a combination of actual numbers (in the case of staff) and recommended SSN guidance on other areas of reporting:

- 10.4 Full Time Equivalent (FTE) staff between April 2021 and March 2022
- 100% homeworking calculations for the 10.4 FTEs
- limited days in the office, therefore estimated bus and car journeys despite applying 100% homeworking assumptions
- all energy consumption numbers will be absorbed into SLAB's emission submissions

Emission Calculations for the Financial Year 2022/23

4.4 Our **Projected Emissions** have been calculated based on the following:

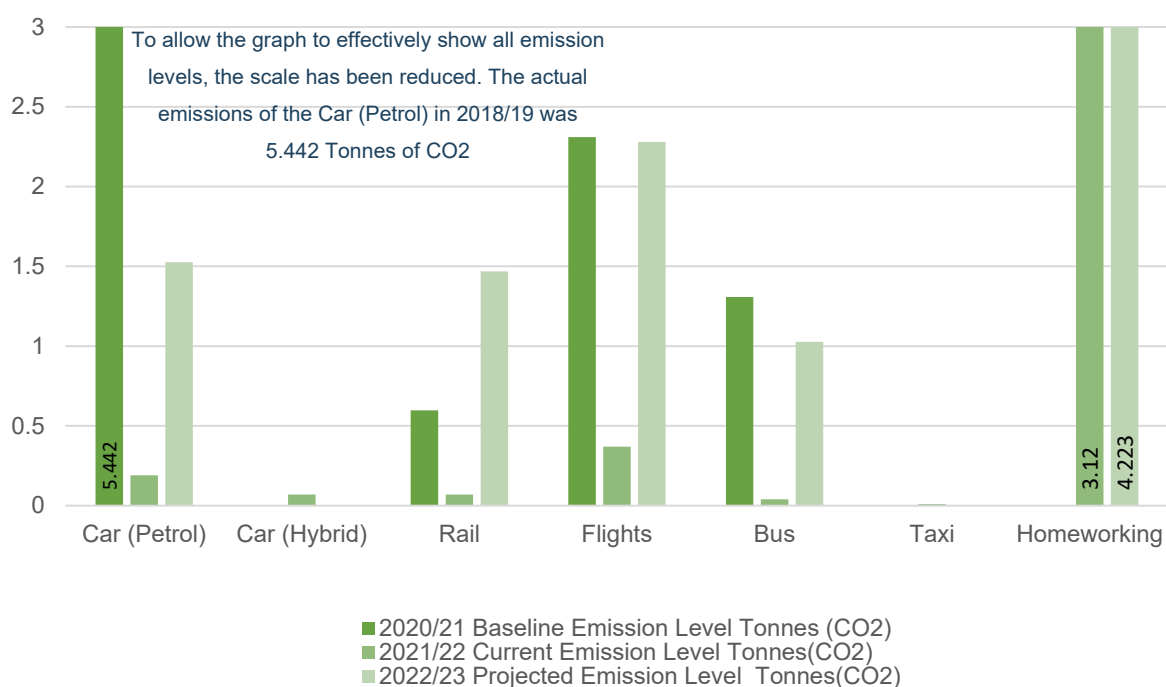
- 20.11 FTE staff between April 2022 and March 2023 based on current and projected staff levels and working patterns during this period
- hybrid and homeworking calculations based on actual staff forecasts
- travel method calculated using actual commute distance
- all energy consumption numbers absorbed into SLAB's emission submissions

4.5 The following table and graph show the key reportable transmission levels by category from our assumptions and calculations that ESS can directly impact. Note that 2021/22 is lower than the projection for 2022/23, due to less staff being in place and significantly less commuting due to Covid restrictions during that period.

Baseline, Current and Projected Emissions in Tonnes Carbon Dioxide (CO₂)

Category	Scope	2020/21 Baseline Emission Level <i>Tonnes (CO₂)</i>	2021/22 Current Emission Level <i>Tonnes (CO₂)</i>	2022/23 Projected Emission Level <i>Tonnes (CO₂)</i>
Car (Petrol)	3	5.442	0.188	1.526
Car (Hybrid)	3	0	0.066	0
Rail	3	0.598	0.072	1.468
Flights	3	2.310	0.375	2.280
Bus	3	1.076	0.044	1.027
Taxi	3	0	0.005	0
Homeworking	3	0	3.120	4.223
Total		9.426	3.870	10.524

Figure 1 - Emissions Details



5. Our Route to Net Zero

5.1 Long term, our target is to achieve net zero by 2045, with an understanding of how negative emissions can be achieved beyond this.

5.2 We are a small organisation with relatively low overall emissions and therefore are limited in what we can directly impact. However, as our ways of working transition from home to hybrid, we will continue to keep our emission targets under review as our working patterns evolve over time. We will also have an indirect impact through our influence and carrying out our statutory duties.

5.3 We have separated out the areas where we have a direct impact through our actions, and those where we have a more indirect impact. [Appendix 1](#) details those activities which are as a result of the influence and impact of our work, our indirect impact actions. [Appendix 2](#) covers those activities where we have a direct impact. The key activities for both these areas are detailed below.

Key Activities

5.4 Our steps to reduce emissions will concentrate on energy, transport, waste, and our supply chain. We will also consider how best to: measure our indirect emissions; impact these through our influence and impact of our work; and ensure our staff are fully engaged with our route to net zero. Our key activities to achieve net zero are set out below.

The Influence and Impact of Our Work

5.5 ESS will influence the wider public sector, and its route toward net zero, through our work by:

- monitoring information about the quality of the environment in Scotland and the effectiveness of environmental law, including representations brought forward by individuals, groups and organisations
- seeking information from public authorities, including the Scottish Government, and working with public authorities to understand the background to regulatory policies and practices
- selecting a small number of cases for detailed investigation, prioritising cases where there is the greatest risk to the environment

- working with public authorities, where necessary, to seek to agree changes in practice to reflect environmental law, or develop advice on recommended changes to the law to improve its effectiveness
- publishing all completed investigation reports on our website
- publishing relevant completed analytical work on our website
- considering ways to proactively share information on our investigations, hot topics, horizon scanning, etc.
- contributing to open consultations on relevant environmental issues

Our Travel and Transport

5.6 ESS will work towards achieving our targets by:

- encouraging staff to use greener modes of transport when commuting to and from the office, for business meetings and in their daily life
- exploring avenues to assist staff in making sustainable transport choices when travelling for work
- setting targets aimed at reducing the overall amount of work-related travel carried out by 2025
- creating a Travel Policy for the financial year 2023/24
- exploring methods with the building landlord to maximise carbon emission reduction opportunities across all building users

5.7 While hybrid working will continue to be how we work, we recognise there is real value in face-to-face meetings for wellbeing and focused collaboration. Wherever possible, consideration will be given to meetings being held virtually using the best technology available.

Office-Based Emissions

5.8 Although ESS will not report on office emissions directly, it hopes to influence and support reductions as set out below:

- influence reductions in electricity consumption through best practice use of control for heating, lighting, and IT
- explore opportunities to maximise office capacity across a reduced number of available days by 2025
- work with SLAB and other Thistle House tenants on

- aligning net zero targets
- influencing implementation of sustainable practices for energy supply by moving to a 100% renewable energy source
- improving recycling opportunities and minimise waste within Thistle House by 2025

Working Practices and Staff Engagement

5.9 Through our ongoing commitment to learning and development, and to achieve our net zero ambitions, ESS plans to:

- designate individuals within the organisation to be ‘net zero leaders’ and/or ‘sustainability managers’ by 2025
- implement sustainability and carbon reduction awareness training as part of staff induction as well as incorporating this into full team activity days
- include at least one mandatory sustainability objective into individual annual performance reviews by 2023
- introduce a sustainability section into our ongoing internal communications by 2023
- share emission findings with the team on an annual basis to keep everyone involved in ensuring we are linear with our goals to meet net zero
- identify ways to measure and reduce emissions associated with homeworking
- explore impact of digital carbon footprint and how to reduce by 2024

Corporate Reporting and Governance

5.10 In order to demonstrate and report on the work we are doing to achieve our ambitions, ESS will:

- ensure carbon reduction and sustainability is embedded in all annual reports and fully compliant with the latest Climate Change legislation
- work with the Carbon Trust to look at calculating the carbon footprint of all published Corporate Reports, ESS Events and overall Organisational footprint by 2025
- carry out a review of our Sustainability Plan every 6 months

Indirect Emissions

5.11 In order to influence and meet our ambitions through our work with third parties, ESS will:

- identify ways to measure and reduce emissions associated with our supply chain
- ensure potential contractors demonstrate their commitment to achieving net zero before considering procurement

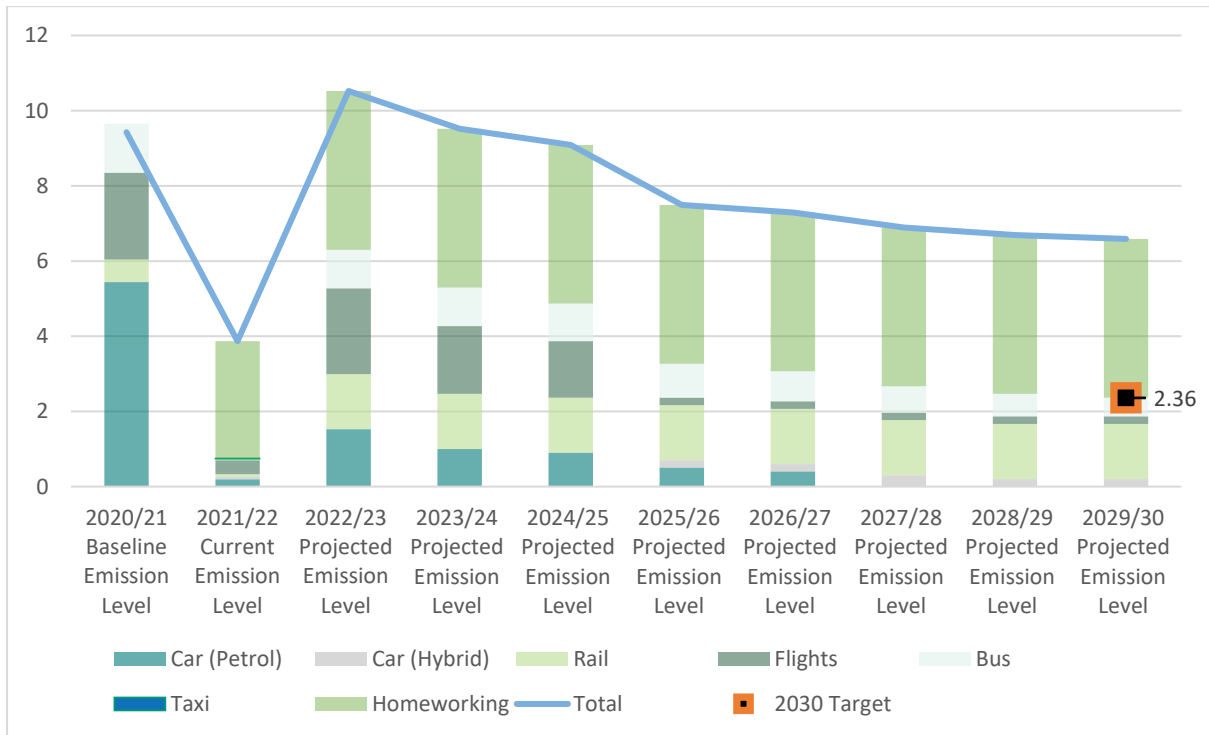
Next Steps

5.12 ESS has made the decision to set our baseline staffing level data at the same level as the actual time of vesting. This will mean some of the reported emission levels will actually increase as our staffing levels reach capacity. The actions identified in this report are aimed at reducing our transport impacts and creating action plans and targets for this going forward.

5.13 By the end of 2023, the organisation will have two full years of carbon emission data which will be used to set specific measurable targets for Phase 2 (2025 – 2030). We have not set any specific targets at this point other than reducing carbon emissions by 75% by 2030 to 2.36 tonnes CO₂.

5.14 The projected trajectory will not achieve this without further actions being identified and implemented in phase 2 of the plan, as the homeworking emissions alone are 4.2 tonnes CO₂. A diagram of the projected impacts of the current actions is shown below.

Figure 2 - Projected emissions in Tonnes CO2 based on current actions



5.15 Additional areas which will be considered in Phase 2 are:

- understand the indirect emissions related to our procurement choices and build this into our sustainable procurement plans
- review the options for independent verification of our carbon emission claims, ways of working and sustainability plan by an accredited third party
- the use of Carbon Offsetting to help deliver Net Zero

5.16 Appendix 1 and 2 detail the actions we will take over the next three years in Phase 1 of the Sustainability Plan.

6. Appendix 1

Commitments to Reduce our Indirect Emissions by Year

Category	2022/23	2023/24	2024/25
Influence and Impact of Our Work	<ul style="list-style-type: none"> • Monitor information about the quality of the environment in Scotland and the effectiveness of environmental law, including representations brought forward by citizens and interested groups • Seek information from public authorities, including the Scottish Government, and working with the public authorities to understand the background to regulatory policies and practices • Select a small number of cases for detailed investigation, prioritising cases where there is the greatest risk to the environment 	<ul style="list-style-type: none"> • Continue activities commencing between 2022-2023 	<ul style="list-style-type: none"> • Continue activities commencing between 2022-2025

Category	2022/23	2023/24	2024/25
Influence and Impact of Our Work	<ul style="list-style-type: none"> • Work with public authorities, where necessary, to seek to agree changes in practice to reflect environmental law or develop advice on recommended changes to the law to improve its effectiveness • Publish all completed investigation reports on our website • Consider a stakeholder newsletter, or event, that includes investigation, hot topics, horizon scanning, etc. • Contribute to open consultation on relevant environmental issues 		
Indirect Emissions	<ul style="list-style-type: none"> • Identify ways to measure and reduce emissions associated with our supply chain 	<ul style="list-style-type: none"> • Ensure potential contractors demonstrate their commitments to achieving net zero before considering procurement 	

7. Appendix 2

Commitments to Reduce our Direct Emissions by Year

Category	2022/23	2023/24	2024/25
Travel and Transport	<ul style="list-style-type: none"> Encourage staff to use lower carbon modes of transport when commuting to and from the office, for business meetings and in their daily life Explore avenues to assist staff in making sustainable transport choices Explore methods with the building landlord to maximise carbon reduction opportunities across all building users 	<ul style="list-style-type: none"> Set targets aimed at reducing the overall amount of travel carried out Create a 'Travel for Work' Policy 	<ul style="list-style-type: none"> Monitor and evaluate targets set out between 2022-2024 and update as needed

Category	2022/23	2023/24	2024/25
Office-Based Emissions	<ul style="list-style-type: none"> • Collaborate net zero targets with property owners and other tenants of Thistle House • Influence implementation of sustainable practices for energy supply by moving to a 100% renewable energy source • Influence reduction in electricity consumption through best practice use of control for heating, lighting and IT 	<ul style="list-style-type: none"> • Improve recycling opportunities and minimise waste within Thistle House • Explore opportunities to maximise office capacity across a reduced number of available days 	<ul style="list-style-type: none"> • Implement office use to a reduced number of days • Monitor and evaluate sustainability influence within Thistle House
Working Practices and Staff Engagement	<ul style="list-style-type: none"> • Implement sustainability and carbon reduction awareness training as part of staff induction as well as incorporating this into full team activity days 	<ul style="list-style-type: none"> • Designate individuals within the organisation to be 'net zero Leaders' or Sustainability Managers' 	<ul style="list-style-type: none"> • Monitor and review activities set out between 2022 – 2024 and update as needed

Category	2022/23	2023/24	2024/25
Working Practices and Staff Engagement	<ul style="list-style-type: none"> • Include at least one mandatory sustainability objective into individual annual performance reviews • Introduce a sustainability section into our monthly newsletter • Share emission findings with the team on an annual basis to keep everyone involved in ensuring we are linear with our goals to meet net zero • Identify ways to measure and reduce emissions associated with homeworking 	<ul style="list-style-type: none"> • Explore impact of digital carbon footprint and how to reduce by 2024 	<ul style="list-style-type: none"> • Review and update carbon and sustainability training

Category	2022/23	2023/24	2024/25
Corporate Reporting and Governance	<ul style="list-style-type: none"> • Ensure carbon reduction and sustainability is embedded in all annual reports and fully compliant with the latest Climate Change legislation 	<ul style="list-style-type: none"> • Record the carbon footprint for all reports published. • Carry out annual sustainability audit of ESS practices and procedures. • Carbon reduction and sustainability as a regular agenda item for Board / executive team meetings 	<ul style="list-style-type: none"> • Continue to monitor Climate Change legislation

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