



Preparing for a changing climate

**The UNISON Scotland Submission to the
Scottish Government Second Consultation to
inform Scotland's climate change adaptation
framework.**

July 2009

Executive Summary

- UNISON is Scotland's largest public service trade union representing more than 162,000 members working largely in the public sector.
- UNISON is a member of Stop Climate Chaos Scotland, and welcomes the world-leading Climate Change (Scotland) Act, and in particular, the statutory climate change duty on all public bodies, which will drive forward mitigation and adaptation action.
- Adaptation to prepare for the impact of climate change is essential, alongside a commitment to drastically reduce Scotland's carbon footprint. A strategic approach to adaptation planning is the correct way forward.
- We believe that Scotland's Climate Change Adaptation Framework should include a specific commitment to social justice - through the five sustainable development principles - and to protection of the most vulnerable.
- The Framework should build on the Social Vulnerability to Climate Change Adaptation Framework, developed in the SNIFFER report on the Differential Social Impacts of Climate Change in the UK.
- The Framework should highlight the importance of 'inward' adaptation - the impacts on workers of adaptation measures. Organisations in both the public and private sectors should include 'inward' as well as 'outward' looking adaptation in how they respond to the challenge of climate change.
- In both mitigation and adaptation, there are opportunities in the change to a low carbon economy, but it is important that this 'Just Transition' is planned, with full and wide consultation and negotiated agreements with workers.
- The global financial crisis must not be used as an excuse not to invest now in proper mitigation and adaptation measures. As the Stern Review said, the costs of not acting are far greater than acting now.

Introduction

This paper constitutes UNISON Scotland's response to the Scottish Government's second consultation to inform Scotland's climate change adaptation framework, *'Preparing for a Changing Climate.'* We also submitted a response to the Scottish Government's first consultation: *'Adapting our ways: Managing Scotland's climate risk.'*ⁱ

UNISON Scotland welcomes the opportunity to respond to this consultation. UNISON is Scotland's largest public service trade union, representing more than 162,000 members working largely in the public sector in Scotland. Many of our members are at the forefront of planning for adaptation, protecting the environment and the quality of life for everyone in Scotland.

As we highlighted in our earlier response, UNISON has long supported sustainable development and green workplace policies as key trade union issues that also link with our international outlook on social justice. At UK level, the Trade Union Sustainable Development Advisory Committee, a joint TUC/DEFRA body, has pointed out that:

'Sustainability' is not something we put in a separate box marked 'green'. It is a core trade union and workplace issue. It directly impacts on jobs, in numbers, types, skills and locations. The employment and training implications of the transition to a low carbon economy are profound, as is the need to manage the changes fairly - through the so-called 'just transition'.

The 'Just Transition' concept is recognised in mitigation planning and trade unions internationally are campaigning for it to be part of the final UN global deal on climate change due to be agreed in Copenhagen in December 2009.ⁱⁱ It can and should be applied equally to adaptation.

The May 2009 STUC/Scottish Government joint Communiqué on Climate Changeⁱⁱⁱ agrees that "the transition to a sustainable economy needs to be socially just", and it states that: "Addressing the economic, employment and social impacts of the transition to the low-carbon economy and adapting to climate change will be vital to building stakeholder support and delivering the necessary programmes of action."

In April 2009 the TUC published new research on the implications for employment of adaptation to climate change. The TUC report *'Changing Work in a Changing Climate'*^{iv} highlighted that to date very few employers have looked at 'inward-facing adaptation' - the impacts on workers of adaptation measures and how they are designed, planned and implemented. Many employers have started, or are starting, to assess the impacts of climate change on their business planning, markets or services - 'outward-facing adaptation'. However, much more must be done on 'inward' adaptation.

UNISON believes that its importance should be recognised in the Framework, along with the principles of sustainable development. Inward adaptation is interdependent with 'outward' adaptation. Indeed, as the TUC argues: "... inward-looking adaptation is likely to strengthen and underpin any efforts in outward-facing adaptation."

In both mitigation and adaptation, we believe there are opportunities in the change to a low carbon economy, but it is important that this 'Just Transition' is planned, with full and wide consultation and negotiated agreements with workers.

The Climate Change (Scotland) Act

UNISON Scotland is a member of the Stop Climate Chaos Scotland coalition and has worked closely with other members in lobbying for the strongest possible climate change legislation. UNISON is particularly pleased that the Climate Change (Scotland) Act sets a **statutory climate change duty** on all public bodies in Scotland.

The new duty says that public bodies, in carrying out their functions, must:

Act in the way best calculated to contribute to the delivery of the greenhouse gas emissions reduction targets in the Act

Act in the way best calculated to help deliver any adaptation programme laid before the Scottish Parliament under the Act

Act in the way they consider is most sustainable.

Climate change adaptation programmes responding to the risks of the impact of climate change must set out objectives on adaptation, proposals and policies for meeting those objectives and the arrangements for involving employers, trade unions and other stakeholders in meeting those objectives. They must also set out the mechanisms for ensuring public engagement in meeting the objectives and the period within which the policies and proposals will be introduced, as well as otherwise addressing the risks identified in a report by the Secretary of State to the UK Parliament, presented to the Scottish Government.

It is clear that Scotland's public services have a vital role to play in how our nation responds to the challenge of tackling climate change. We believe that the duty on public bodies will ensure the public sector leads by example and will help drive the early action and the awareness-raising that is necessary to both cutting greenhouse gas emissions and adapting to climate change.

Involving workers is vital to success and UNISON is keen to encourage all employers in the public and private sectors to negotiate green workplace agreements with their recognised trade unions. UNISON itself has strong internal green policies and is working to build its network of environment representatives.

Professional bodies, such as the Royal Town Planning Institute (RTPI), (which many UNISON members are members of) are making strong policy commitments on climate change.^v The RTPI is developing a toolkit of tests enabling the "climate-change proofing" of regional and local, plans and policies and it is to compile a compendium of world class best planning practice and research. Crucially, it will also work to ensure climate change is given necessary prominence in all professional education and training and in professional development programmes. In its response to the first consultation, the RTPI highlighted the need to address skills development across professional groups.

UNISON supports the STUC's call for interlinked strategies to deal with the transition to a low carbon economy. These strategies would cover: green workplaces, transitional skills, Just Transition, and a low-carbon industrial strategy. These strategies should also take adaptation measures into account.

Climate Change Adaptation Framework - principles

The consultation document sets out a strategic aim and three supporting objectives for the Framework (2.2), along with six principles for a sustainable approach to climate change adaptation (Box 8).

The document states that the strategic aim is:

To increase Scotland's resilience to the impacts of climate change through its people, and the natural and economic systems on which they depend.

This has the following supporting objectives:

(focusing ongoing action on three areas: **Exposure**; the degree to which Scotland is exposed to change such as increases in annual temperature; **Adaptive Capacity**; the ability of organisations and stakeholders to identify risks and take appropriate action; and **Competing Pressures**; the degree to which organisations are restricted in how much they can do to adapt to a changing climate by other, competing pressures and constraints)

Improving the understanding of the consequences of a changing climate, both the challenges and opportunities it presents;

Equip stakeholders with the skills and tools needed to adapt to a changing climate; and

Integrate climate change adaptation into public policy and regulation.

The six principles "for a sustainable approach to climate change adaptation" are:

Adaptation must be addressed alongside actions to reduce emissions

Adaptation should be through actions that build long-term resilience

Adaptation should be informed by an appropriate cycle of review and action

Adaptation should be integrated into existing development and implementation

Adaptation should be integrated at an appropriate scale and involve relevant levels of decision-making

Adaptation should seek to avoid limiting future adaptation or restrict others from adapting.

UNISON Scotland argued in our response to the first consultation that its proposed principle on resilience should be amended to state that:

Adaptation should be through actions, based on sustainable development principles, that build resilience and protect the vulnerable.

We would reiterate that there should be a specific commitment to sustainable development principles* and to protection of the vulnerable. This could be in one of the principles, as above, or, the third objective could be amended to:

Integrate climate change adaptation, based on sustainable development principles, into public policy and regulation.

**The sustainable development principles are: Living Within Environmental Limits; Ensuring a Strong, Healthy and Just Society; Achieving a Sustainable Economy; Using Sound Science Responsibly and Promoting Good Governance.*

COSLA, in its response to the first consultation, noted that its members had stressed “the importance of sustainable development as a supporting framework through which to tackle climate change and secure successful adaptation. Without a suitable over-arching framework, which secures linkages across all relevant social, economic and environmental policy agendas, adaptation principles may only emerge, late in the day, as reactions to environmental events rather than be progressed pro-actively in anticipation of future risks and opportunities.”

The UK Government’s ‘Adapting to Climate Change’ Programme is guided by core principles including the five sustainable development principles above.^{vi}

There are some important comments in the consultation document supporting a sustainable and fair approach, including Climate Change Minister Stewart Stevenson’s comments in the Foreword where he states: “If the present economic climate teaches us one thing, it is that Scotland needs to build and plan on the basis of long-term, sustainable ideas – not just short-term gain.” And on inequalities there is, for example, the commitment on page 34, that in the light of the Stern Review raising the issue of the influence of climate change on equity and social justice, “the Government will continue to consider how social impacts may be most effectively addressed in adaptation measures to ensure existing inequalities do not widen with climate change”.

However, we believe that the Framework must state these commitments explicitly and urge that the final document finds a way to include them as part of the principles. Adaptation planning should be inclusive of all groups in society.

The 2009 Scotland and Northern Ireland Forum For Environmental Research (SNIFFER) report, referred to in the consultation document, on the ‘Differential Social Impacts of Climate Change in the UK’,^{vii} developed a Social Vulnerability to Climate Change Adaptation Framework. We would suggest that this is used to inform all adaptation work across the public and private sectors and that Scotland’s Climate Change Adaptation Framework builds on this, including in the Action Programme for Government and any further research.

We note that the SNIFFER report states emphatically (p.iii) that: “socially responsive climate change adaptation policy needs to be delivered within the context of sustainable development”, while “action should be proportionate, and integrated with climate change mitigation; and involve collaboration with the people who are most vulnerable to climate change.”

We believe it is essential that the people who are most vulnerable are involved, just as we argue that workers should be involved in both ‘inward’ and ‘outward’ adaptation planning.

The TUC report Changing Work in a Changing Climate highlights examples of the ways in which workers can be affected and why it is so important to address inward adaptation. These include, in health and safety and climate hazards at

work; “issues around statutory responsibilities and funding for dealing with extreme events such as floods: and about indoor and outdoor working conditions including workplace temperatures and equipment, clothing and shift patterns to deal with more gradual changes”. UNISON believes that it is essential for adaptation work to address these employment issues and to do so as part of an overall ‘Just Transition’.

The TUC report has recommended that the Health & Safety Executive, in partnership with DEFRA, develop new guidance on adapting workplaces to climate change and that the issue of establishing statutory limits on upper workplace temperatures should be revisited as an urgent priority. It also suggests that dress codes, equipment and shift patterns may need to be renegotiated by employers and trade unions at local level.

UNISON and other trade unions want to see environment representatives have the same legal facility time and training rights as other union reps. This will be important in negotiating green workplace agreements across the public and private sectors. (The June 2009 Labour Research Department booklet on Unions and Climate Change makes the case for union environment reps. ^{viii})

Local authorities and other public bodies in Scotland, alongside the private sector, rely on skilled staff in their work on flood risk, areas at risk from landslide and protecting transport, energy and water infrastructure. Building adaptive capacity within organisations is essential and quality employment conditions and proper training are extremely important in delivering this.

The importance of public engagement is recognised in the consultation document. The importance of trade union involvement is recognised in the Climate Change (Scotland) Act. We suggest that both should be a key part of the Adaptation Framework.

UNISON Scotland's Response to the Consultation Questions

The Government wishes to improve understanding of the consequences of a changing climate.

1(a) Do you think the six actions identified in section 2.6 are the most appropriate actions to achieve this? Yes/In part/No

In part. We believe that the Framework should be designed to ensure that all this important work around climate models, risks and opportunities of a changing climate and the costs of the risks and opportunities should consider ‘inward’ adaptation, as detailed above, and should look at the differential impacts of climate change, with a view to protecting the most vulnerable and considering how to deliver a fair distribution of the costs of adaptation. We propose that the Social Vulnerability to Adaptation Framework in the SNIFFER report should be referred to in the Action Programme for Government so that it can be incorporated into a range of policy and planning work. To give just a couple of examples, this identifies issues around the social impact of climate change on food, with a range of proposed responses including addressing cost issues for low income households through the benefits systems and school meals, changes in

institutional procurement of food and menus and work with farmers and food producers. This work is clearly cross-cutting and, for example, should link in with action on Scotland's National Food and Drink Policy (which is emphasising sustainability, links with health and the role of public sector procurement, issues we highlight too in UNISON's Food for Good Charter^{ix}), obesity, and the Good Places, Better Health environment and health implementation plan (which needs to have a greater focus on the impact of climate change). On flood risk management, it is important for this work to take on board research into social justice and flood risk management.

UNISON also believes that the UK Cost-Benefit Analysis must look at inward adaptation and link in with work on mitigation and the 'Just Transition'. This would be in line with the STUC/Scottish Government Communiqué on Climate Change.

1(b) Are there additional actions that you think are necessary and if so, what are they? (Please identify up to three)

In the STUC/Scottish Government Communiqué on Climate Change, the Government agreed to undertake a scoping exercise of what research there is on the impact of climate change on employment at national and regional level and report back to the STUC with the results. Once the scoping exercise has been done, there should be an agreement on what further research is needed in Scotland, focusing on employment and both mitigation and adaptation.

The Government wishes to improve the capacity of individuals and organisations to adapt well to a changing climate.

2(a) Do you think the two actions identified in section 2.7 are the most appropriate actions to achieve this? Yes/In part/No

Yes. Raising awareness within organisations and providing decision support tools and training are key to successful adaptation work. Public engagement is also extremely important and the public sector has a major role in both awareness-raising and disseminating relevant information, including full details of all the work it is doing.

2(b) Are there additional actions that you think are necessary and if so, what are they? (Please identify up to three)

The Action Programme for Government actions under this heading should specifically include reference to ensuring that skills strategies consider adaptation issues.

While we recognise that the Climate Change Adaptation Framework focuses on domestic adaptation, we would reiterate here our point from our first consultation response that the Scottish Government should make a financial commitment to support adaptation work in developing countries. Any funding must be additional, and must not come out of existing aid budgets. This seems to us to be not only fair, given the historic contribution of developed countries to high greenhouse gas emissions, but

it is useful, as part of raising awareness, to highlight the fact that climate change is a global problem and each country must have an international, as well as domestic outlook.

The Scottish Climate Change Impact Partnership (SCCIP) website provides a number of tools to help increase the resilience of organisations and infrastructure in Scotland to the impacts of a changing climate.

3(a) Have you used the website or contacted SCCIP directly for advice or help? Yes/No

Yes

3(b) If yes, which of the following four services did you use and how do you think the service might be improved:

i. Data on climate trends and impacts in Scotland. Yes/No

No

How do you think this service might be improved?

N/A

ii. Latest research and project information including sharing best practice. Yes/No

Yes, although not an in depth look yet, so not sufficient enough to comment in detail.

How do you think this service might be improved?

Kept up to date and comprehensive. Most useful to have documents accessible from the site, rather than referred to other sites. Also, problems with search engine.

iii. Tools and resources to support action in adapting to and mitigating climate change. Yes/No

Yes, although not an in depth look yet, so not sufficient enough to comment in detail.

How do you think this service might be improved?

Kept up to date and comprehensive. Perhaps with options for discussion/feedback on how particular tools have been used and advantages/disadvantages. The directory of expertise is useful and a good idea, but could be expanded.

iv. Training and support events. Yes/No

Yes - Tried to but no information on the site, and search engine was not working.

How do you think this service might be improved?

Kept up to date. A dedicated part of the site. If no training/events currently planned, state this somewhere. Keep an archive where possible of documents/presentations etc from previous events, or links to where these can be accessed off site.

4. What are the equalities implications of the proposed Framework?

As noted above, the SNIFFER report and other research shows clearly that the poorest in society will be disproportionately affected, around the world and in the UK, with women, children and the elderly being most vulnerable. This framework must make a very specific commitment to protecting the vulnerable and should make use of the Social Vulnerability to Adaptation Framework in the SNIFFER report, bringing specific reference to it into the Action Programme for Government so that it can be incorporated into a range of policy and planning work, not just in adaptation work, but, as the report argues for, in work building the capacity of vulnerable people.

5. The Government wishes to identify barriers to effective climate change adaptation and to address these barriers, where possible. Are you aware of particular rules, regulations or government actions that pose a barrier to you in effectively adapting to climate change? If so, please identify up to three which you would like the Government to address.

It seems to us that a key barrier is likely to be the financial crisis and an attitude that perhaps this work should wait until an organisation/business/local authority has less financial pressures on it before acting on adaptation. Government action has a major role here.

Citing cost concerns is a short sighted attitude, because, as the Stern Review said, the costs of acting now are far less than the costs of not acting or acting too late. However, it might in some situations be a realistic attitude where there are genuine funding problems that could be tackled by government action, whether in ensuring local authorities are properly funded for adaptation action, or in providing information, resources and incentives for the public sector, businesses and individuals to plan for the changing climate.

Genuine funding problems of course affect the most vulnerable in society and government needs to take action such as ensuring that low-cost housing is available outside high-risk flooding zones and that insurance is available for low-income households.

Another barrier will be the fact that few employers to date have been engaging with inward adaptation, as referred to earlier. We would repeat that the final Framework must include a reference to this and it should be incorporated into the Action Programme for Government so that all sectors take it on board.

We noted earlier Stewart Stevenson's reference to the importance of long-term sustainable ideas. As we said in our first consultation response, when planning new public infrastructure, we should take into account the uncertainties about the coming impact of climate change. That would add to the strong case that lengthy, inflexible and costly PFI/PPP type contracts, which limit public bodies' control over schools, hospitals and, with the hub concept, many other public buildings, do not make sense. Similarly, ideas such as the potential mutualisation/privatisation of Scottish Water would be rejected, if examined with sustainability and the need for good governance in mind.

In Chapter 3, we set out the roles for the public sector, local government, the voluntary and business sectors which, if enacted, we believe will build resilience to a changing climate.

6(a) If you are responding from an organisation or institution (as you have identified in your Respondent Information Form), please offer your views on the roles set out for the sector which best represents your organisation.

UNISON works largely, but not entirely, within the public sector and we welcome the new climate change duty which will encourage early action by all public bodies. Of course many have already been doing good work, but it is important to have a level playing field and to share best practice ideas as early as possible, as well as to have the sector leading by example. The Scottish Climate Change Declaration has shown the commitment by local authorities and we look forward to various examples of best practice informing the forthcoming guidance to public bodies on the climate change duty.

It will be important for the sector to move quickly in complying with the duty. Our recommendation is that the guidance includes plans for negotiated green workplace agreements that will incorporate adaptation planning along with emissions reduction. As the STUC/Scottish Government Communiqué says: "Worker involvement is the key to culture change in the workplace. And good practice in the workplace will also have a positive influence in the home and community."

6(b) If you are responding from an organisation or institution, please offer your views on the roles set out for other sectors you work with.

UNISON has members in the Third Sector and in private companies and we are equally keen to see negotiated green workplace agreements in these sectors. Worker involvement, as noted above, is key to progressing climate change policies at work.

Obviously the Just Transition strategy that we wish to see will involve these sectors too and it is extremely important that the opportunities in the switch to a low carbon economy are maximised and that Scotland does benefit from a green jobs revolution. We note that the Climate Change Business Delivery Group has been keen for Scotland to lead the world in climate change action. It also recognised the argument for having the climate change duty on public bodies in the primary legislation, with business set to benefit from setting expectations as early as possible. We

hope the CCBDG will actively promote adaptation work also, as it has acknowledged that this has been overlooked until now.

The Third Sector, as noted in the consultation document, is often well placed to connect with the most vulnerable. The SNIFFER report on the Differential Social Impacts of Climate Change has a series of recommendations for the UK Adaptation Programme, which should be incorporated into the Framework, where appropriate. In particular, it recommends strong support for community-led adaptation, integrating this into all planning and decision-making processes relating to climate change and using the experiences of community engagement techniques from the regeneration and health sectors to improve community resilience. It also calls for support for the climate change work of non-governmental organisations and community and voluntary sector organisations working directly with vulnerable groups. In terms of “joined up government”, we would call for this to be taken into account in funding the voluntary sector, which needs more secure and longer term funding for proper planning, as highlighted in the call from the STUC, SCVO, Unite, UNISON and Community Care Providers Scotland for a National Framework for Public Service Contracts.^x

6(c) If you are responding as an individual not affiliated to an organisation (as you have identified in your Respondent Information Form), please offer your views on the roles set out for any sectors you interact with.

N/A

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Please provide any additional comments you have on any aspect of the consultation

No further comment.

Conclusion

UNISON Scotland believes the Climate Change (Scotland) Act is one of the most important pieces of legislation ever passed by the Scottish Parliament. It will help Scotland be one of the world leaders in reducing greenhouse gas emissions and we must ensure that there are equally world-leading ambitions in adapting to our changing climate in a sustainable way.

The Adaptation Framework must be based on sustainable development principles and include protection for the most vulnerable, as well as incorporating proper

regard for the effects of adaptation on employment and the related health and safety, skills and social justice issues.

There must be no use of the financial crisis as a reason not to act on adaptation. The Stern report made clear that the benefits of strong, early action considerably outweigh the costs. Leadership is required to make this happen and communicate clearly to the public the ways in which everyone can contribute. With the measures in the Climate Change (Scotland) Act, the public sector is well placed to provide that leadership. To do so, it deserves a clear lead from the Scottish Government with an Adaptation Framework that is fit for purpose.

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ⁱ <http://www.unison-scotland.org.uk/response/climateriskresponse.html>

ⁱⁱ <http://www.ituc-csi.org/spip.php?article3696> Also, see Scottish Parliament Motion 04435 at: <http://www.scottish.parliament.uk/Apps2/business/motions/Default.aspx?motionid=16896> and UK Parliament Early Day Motion 1654

<http://edmi.parliament.uk/EDMi/EDMDetails.aspx?EDMID=38839&Session=899>

ⁱⁱⁱ <http://www.stuc.org.uk/news/643/stuc-and-scottish-government-issue-joint-communicue-on-climate-change>

^{iv} Changing Work in a Changing Climate at www.tuc.org.uk/extras/adaptation.pdf

^v <http://www.rtpi.org.uk/download/6440/Sevencommitments.pdf>

^{vi} <http://www.defra.gov.uk/environment/climatechange/adapt/programme/principles.htm>

^{vii}

http://www.sniffer.org.uk/Webcontrol/Secure/ClientSpecific/ResourceManagement/UploadedFiles/UKCC22%20FinalReport_web.pdf

^{viii} <http://www.lrdpublications.org.uk/publications.php?pub=BK&iss=1464>

^{ix} <http://www.unison-scotland.org.uk/foodforgood/>

^x <http://www.stuc.org.uk/campaigns/fair-funding-for-voluntary-sector-public-service-contracts>