



WWF *for a living planet*

Footprint, SOAs and Outcome Indicators SSN and WWF Scotland Briefing December 2009

This briefing has been prepared by the Sustainable Scotland Network and WWF Scotland. SSN and WWF Scotland are the partner organisations who manage the Local Footprints Project, a national support service for Scottish local authorities on ecological and carbon Footprinting. The Local Footprints Project has been operating since early 2007 and many Scottish local authorities are participating in the project.

Summary & Key Recommendations

On 20th November the Improvement Service published an updated Outcome Indicators menu for Single Outcome Agreements, along with a 'good practice note'. The updated menu sees the removal of "Council Area's Ecological Footprint" from the menu and the recommendation that "CO2 emissions per capita" be used instead. "CO2 emissions per capita" refers in the menu to the Department for Energy and Climate Change (DECC) Local Authority Area CO2 Emissions data.

Prior to the publication of the updated menu, SSN and WWF sent a joint letter to the Outcomes Indicator Project Board outlining a number of concerns about removing Footprint from the menu of outcome indicators. A copy of the letter is attached in Appendix 1.

While SSN and WWF Scotland are extremely disappointed to see Footprint removed from the menu of outcome indicators, we would like to stress the importance of using Footprint and Footprint analysis by local authorities and Community Planning Partnerships (CPPs). It is vital to remember that Footprint is more than an indicator, and commitments by local authorities and CPPs to achieving lower Footprint outcomes for communities should not be undermined by a shift to using the DECC Local Authority Area CO2 data.

SSN and WWF Scotland recommend:

- I. The continued use of Footprint for education/awareness raising, scenario planning and policy analysis by local authorities and CPPs.**
- II. Further investment of time and effort to understand and make use of the DECC data and Footprint analysis to inform activities that will contribute to the achievement of outcomes.**
- III. That local authorities and CPPs should work together with the Local Footprints Project to increase local and national investment in scenario planning and policy analysis, and broader awareness raising, through the combined use of Footprint and DECC GHG inventory data.**
- IV. The Scottish Government, CPPs and other key stakeholders should invest in the Footprint approach at national and local levels, to develop improved time series data, improved Scottish and local sources of data, and commitment to long-term production of results. This work should contribute to developing the Footprint and improving its use as an indicator.**

SSN and WWF Scotland continue to receive positive comments from key stakeholders that our work, and the work of local authorities and CPP, on Footprint is still regarded as valuable and desirable. Gavin Whitefield, Chief Executive of North Lanarkshire Council and John Mason, Director Climate Change, Energy and Water Industry at the Scottish Government addressed these issues at the Local Footprints launch of the Scottish Footprint Guide on 25th November. To download the full speeches visit

<http://www.localfootprints.org/index.asp?pg=2>

Mr. Whitefield stated, "I am conscious that the updated menu of indicators for the SOA which has recently been produced by the Improvement Service excludes the footprint indicator. However I would like to make two points in relation to this. The SOA menu of indicators is not prescriptive and CPPs can still include the footprint indicator if they wish to do so. Also, and I think more importantly, I believe the footprinting process remains a crucial part of the actions which can be taken to support sustainability outcomes that are included in the agreements."

John Mason, Scottish Government noted that, "...the ecological footprint will be a great aid to local authorities in progressing both climate change and the wider sustainability agenda. Ecological footprint is a powerful communication tool on over consumption, helping to raise awareness and aid public engagement. The ecological footprint tool's strength is in its ability to analyse the impact of different policy options. This will be valuable to local authorities and their partners as they look to understand the wider impacts of policy decisions on their key local indicators."

1. Background

Through the work of the Local Footprints Project and the efforts of sustainable development officers in many Scottish local authorities, excellent progress has been made in integrating the use of Footprint into many Single Outcome Agreements. This work was also supported by the focus of the Scottish Government's National Performance Framework, including the National Outcome to 'reduce the global and local impact of our production and consumption' and the National Indicator on 'Ecological Footprint'. Additionally, the Improvement Service included the use of Ecological Footprint in version 3.1 (and earlier versions) of the SOA menu of outcome indicators.

By the second round of SOAs, 18 local authorities were using Footprint as an indicator in their SOAs and a further five referenced Footprint within their area profiles.

2. Recent Developments – The Outcome Indicators Project

In mid-2009 the Improvement Service initiated a project on behalf of SOLACE Scotland to review the number of Outcome Indicators used in SOAs and to develop a revised menu of Outcome Indicators. The project's aim was to provide a more focused and strategic menu of Outcome Indicators, which included indicators which were judged to be: Relevant and unambiguous; Harmonised with other frameworks and concepts; Timely and accessible; Statistically Robust; Affordable.

SSN and WWF Scotland have been tracking progress of the Outcome Indicators Project. This has included profiling the project at the SSN Summer Quarterly Meeting in June 2009 and remaining in contact with the Improvement Service and Scottish Government on its development. SSN met with the Improvement Service on 5th October to review developments relating to outcome indicators on Footprint and climate change. At that stage it was clear that the recommendation being made to the Project Board was to drop the resource and consumption based approach of Ecological Footprint from the menu of outcome indicators and to recommend the use of the Local Authority Area CO2 Emissions data provided by DECC and aligned with the English National Indicator 186.

Following SSN's meeting with the Improvement Service on 5th October SSN and WWF sent a joint letter to the Project Board outlining a number of concerns about removing Footprint from the menu of outcome indicators and recommending that both the DECC data and the Footprint should be used to address the reality of territorial and consumption measures of greenhouse gas emissions and resource consumption. A copy of this letter is attached in Appendix 1.

3. Version 4 of the Menu of Local Outcome Indicators

On 26th October the Outcome Indicators Project Board met and agreed the revised menu of outcome indicators and on Friday 20th November the menu, along with a covering letter and a 'good practice note' was published. The new menu and guidance is available at <http://www.improvementservice.org.uk/local-outcome-indicators/>. The menu sees the removal of "Council Area's Ecological Footprint" from the menu and the recommendation that "CO2 emissions per capita" be used instead. "CO2 emissions per capita" refers to the DECC Local Authority Area CO2 Emissions data.

4. SSN and WWF Response to Version 4 of the Menu of Local Outcome Indicators

While SSN and WWF Scotland are extremely disappointed to see Footprint removed from the menu of outcome indicators, we would like to stress the importance of using footprint and footprint analysis by local authorities and Community Planning Partnerships. **It is vital to remember that footprint is more than an indicator, and**

commitments by local authorities and CPPs to achieving lower footprint outcomes for communities should not be undermined by a shift to using the DECC Local Authority Area CO2 data.

SSN and WWF Scotland continue to receive positive comments from key stakeholders that our work, and the work of local authorities and CPP, on footprint is still regarded as valuable and desirable. These views have been communicated by, amongst others, the Scottish Government and the Improvement Service, notably in relation to the usefulness of using Footprint to:

- Raise awareness about the resource use and emissions impacts of consumption and lifestyles.
- Engage with a range of audiences, from schools and communities, to councilors and council officers.
- Undertake scenario planning.
- Undertake policy analysis and to inform decision-making and policy development.

The Footprint methodology is aligned with the Scottish Government's requirement, as set out in the Climate Change (Scotland) Act, to provide an annual report on consumption emissions, and the consumption-based approach being taken in the carbon assessment of the Scottish Budget.

SSN and WWF Scotland would also stress that Footprinting, and the use of the Resources and Energy Analysis Programme (REAP) tool, allows local authorities and CPPs to look at ecological, CO2 and CO2e impacts, as well as distinct component parts of the footprint, including transport/travel, housing, food, services, consumables. This more detailed and informed use of Footprint analysis is still of great value to achieving SOA outcomes on 'reducing the local and global impact of consumption', and making a contribution to achieving Scotland's Greenhouse Gas emissions reduction targets. Indeed, use of footprint analysis to raise awareness and undertake policy analysis can lead to a positive impact of the emissions accounted for in the DECC data.

On the issue of using the DECC data in SOAs, we would highlight that SSN and WWF Scotland have supported this approach for some time, as noted in the SSN Briefing issued in February 2009 on 'consistent approaches of climate change' (see http://www.sustainable-scotland.net/documents/9006_Conistent%20Outcomes%20Paper%20-%20March%202009.pdf). The national greenhouse gas inventory is a critical data input to both the DECC local authority CO2 estimates and the consumption estimates of the Footprint and REAP tool. Territorial emissions form the basis of Scotland's climate change emissions targets, and the DECC data is now regarded as Official Statistics. We would recommend that all local authorities invest time in becoming familiar with the DECC data sets and to use these to inform policy and to monitor progress.

However, SSN and WWF have consistently argued that there is legitimacy and value in giving due regard to the impact of consumption, and that the Footprint analysis is in many ways more comprehensive and useful. Footprint is more comprehensive, in that it includes a wider scope of emission-related and resource use-related activities (including imports, aviation and shipping). Footprint is also more useful in that, by using REAP, local authorities and CPPs can develop emission and resource use scenarios, undertake policy analysis and track this through to decision-making. Footprint is also, arguably, a more useful approach for awareness raising, communications and public engagement work. These strengths are confirmed by the experience of local authorities in Scotland who have spent time developing a well-informed Footprint approach.

SSN and WWF Scotland would also highlight that practitioners need to be aware that the scope of the DECC 'Local Authority Area CO2 Emissions' data is limited, in that it excludes important areas such as motorways, international aviation and shipping, and diesel railways. We would also suggest that the DECC data is currently of limited use to local authorities and CPPs if they want to use it for forward planning and policy analysis. Ultimately, the DECC data, while legitimate and useful, only tells part of the emissions/resource use story, and does not provide any useful tools or methodologies to help inform local authority or CPP activities.

Finally, we would stress that the 'Good Practice Note on the Use of Outcome Indicators Within Single Outcome Agreements' issued by SOLACE and the Improvement Service to accompany Version 4 of the Menu of Local Outcome Indicators states that "The Menu of Local Outcome indicators is not prescriptive.... CPPs can also use indicators not included in the Menu if they are considered appropriate to local priorities". Additionally, with respect to indicators removed from the menu, the guidance states that "It is recognised that this means some important outcome areas are not adequately covered... (and that) this in no way implies that such areas are not important issues or that they should not be addressed in SOAs". Consequently, continued use of Footprint –

either as a practitioner methodology to support overall outcomes or as an indicator to complement the DECC data – should be seen as a legitimate and valuable option for all local authorities and CPPs in Scotland.

5. Recommendations

- **The continued use of Footprint for education/awareness raising, scenario planning and policy analysis by local authorities and CPPs.**

It is vital to remember that the SOA will not include everything that a local authority or CPP does to achieve agreed outcomes, and that even if Footprint does not appear as an outcome indicator the use of Footprint by local authorities, schools and CPPs does not need to be halted.

- **Further investment of time and effort to understand and make use of the DECC data and footprint analysis to inform activities that will contribute to the achievement of outcomes.**

SSN and WWF Scotland recognise that SOAs would be strengthened by the consistent reporting of the DECC Local Authority Area CO2 data, but that this could be complemented by the use of Footprint data without any disruption to the SOA process. Effective use of the DECC and Footprint data depends on local authorities and CPPs understanding the detail of what is measured and how data is manipulated, and understanding what can be done to influence the data in order to reflect overall impact on agreed local outcomes.

- **That local authorities and CPPs should work together with the Local Footprints Project to increase local and national investment in scenario planning and policy analysis, and broader awareness raising, through the combined use of footprint and DECC GHG inventory data.**

Local authorities and CPPs, as well as schools and communities, need to develop a more consistent and informed approach to understanding GHG emissions and resource-use impacts, and we would argue that investment in the footprint approach to date has been extremely valuable and can be part of the future work in this area. We look forward to working with the Scottish Government, the Improvement Service and others on this important development.

- **The Scottish Government, CPPs and other key stakeholders should invest in the footprint approach at national and local levels, to develop improved time series data, improved Scottish and local sources of data, and commitment to long-term production of results. This work should contribute to developing the footprint and improving its use as an indicator.**

6. Next Steps

SSN and WWF Scotland are committed to taking forward work on Footprinting into 2010 and beyond. This work has already secured financial support from the Scottish Government for 2010, and we are discussing with local authorities and other stakeholders how the service should be developed and supported into the future. This work will support Footprinting by local authorities, CPPs and schools.

To support work on Footprinting beyond 2009, the Local Footprints Project has developed a Footprint Guide for Local Authorities and Community Planning Partnerships, published on 25th November 2009. This is available online at www.localfootprints.org. SSN and WWF are also taking forward refreshed work on Footprinting in schools, working with key national stakeholders including Scottish Government, Learning and Teaching Scotland and Eco-Schools Scotland. This work will take forward the excellent work developed by the Schools Global Footprint Project (the schools aspect of SSN and WWF Scotland's work on Footprint).

SSN and WWF have already brought together some of the leading technical experts on the DECC and Footprint data to stimulate thinking on a more joined-up, transparent and collaborative way forward. We aim to do more on this in 2010, especially looking at the relationship between the DECC data sets and the CO2 Footprint provided by REAP. This work should contribute to developing capacity within local authorities and CPPs in using both DECC and Footprint data and analysis.

SSN, as part of our wider work on local authority performance improvement, will be seeking ways to develop local authority knowledge and understanding of the DECC data and how it can be used to help inform strategies, plans and programmes.

Appendix 1:

Letter sent by SSN and WWF Scotland to the Outcome Indicators Project Board

19th October 2009

Ecological and Carbon Footprinting in Single Outcome Agreements (SOAs) Outcome Indicators Project – Comments and Recommendations

The Sustainable Scotland Network (SSN) met with the Improvement Service on Monday 5th October to discuss the development of the Outcome Indicators Project and to provide comments on the 'environmental' aspects of this work. The use of Footprinting and the inclusion of climate change mitigation measures in SOAs were of particular focus.

SSN has provided support to local authorities on SOAs, notably through two briefing papers: one on using Footprint in SOAs¹; and one developed through the COSLA Climate Change Task Group process on 'consistent climate change approaches'². SSN and WWF Scotland have also supported local authority use of Footprinting via the Local Footprints Project³. In the 2009 SOAs there has been positive and widespread use of Footprint and climate change related language, outcomes and indicators consistent with the briefings issued, though often framed in ways that are relevant to the local interpretation of priorities.

At the meeting on 5th October it was clear that Ecological (or Greenhouse Gas or Carbon) Footprint was unlikely to be included in the revised menu of indicators, and that a preference has developed for the use of the UK Greenhouse Gas Inventory and the local authority estimates which inform the National Indicator 186 in England. While SSN and WWF Scotland have always recognised the value of the UK data produced by the Department for Energy and Climate Change (DECC, data previously produced by DEFRA) and have supported its use by Scottish local authorities in SOAs and in reporting on Scotland's Climate Change Declaration, we have serious concerns about the omission of Footprint as an indicator in the new menu of outcome indicators.

SSN and WWF Scotland are concerned about the omission of Footprint in the new menu of outcome indicators for the following reasons:

1. While we understand that the intension of the Project is not to undermine good work on scenario planning and policy analysis using the Resources and Energy Analysis Project (REAP) and the related 'Footprint approach', omitting Footprint as an outcome indicator is likely, in reality, to lead to this unintended result. It can be challenging to champion work on sustainable development, climate change and on 'reducing the global impact of production and consumption' within local government and Community Planning Partnerships at the best of times, and the omission of Footprint as an outcome indicator is likely to set back a lot of very important progress to date.

Our concerns about the practical consequences of omitting Footprint as an outcome indicator are heightened further at this particular time when services are being pared back due to the pressures on public finance. The experience of many SSN members is that having Footprint in an SOA offers a reason for local authorities and Community Planning Partnerships to engage in contributing to the National Outcome on 'production and consumption' and to seek efficiency savings in more environmentally sensitive ways. The risk is that without a clear SOA reference point, work on Footprinting will become something which is easier to cut. While it can be argued that this would be a short-sighted saving, as Footprint is only partially embedded at this stage in its application the value of maintaining work on reducing Footprint and consumption emissions is not always appreciated by those making decisions on spending cuts.

2. While we recognise that accounting for consumption impacts and emissions is complex, and that developments are needed in terms of local specificity, ensuring consistent time-series data and shortening time-lags, we feel that simply omitting this reasonably sound approach to addressing

¹ http://www.localfootprints.org/documents/7739_Local%20Footprints%20SOA%20briefing%2026%20Jan%202009.pdf

² http://www.sustainable-scotland.net/documents/9006_Consistent%20Outcomes%20Paper%20-%20March%202009.pdf

³ www.localfootprints.org

consumption impacts is not a constructive approach. As one recent climate change policy paper put it, when addressing the need to keep a focus on both production and consumption emissions, 'shutting one eye (by ignoring consumption emissions due to accounting complexities) does not make climate change half as serious'⁴.

There is a legitimate and on-going debate about carbon accounting which recognises the differential of production/territorial emissions and consumption emissions, as reflected not least in the recent statements by the new Scientific Advisor to DECC, Prof. David MacKay⁵. A number of SSN members, having made good progress integrating Footprint into SOAs and getting their local authorities to purchase a REAP license, perceive the reluctance to include Footprint in the outcome indicators menu as a step that will seriously hamper progress at this critical point.

3. Omitting Footprint will have significant implications for the Local Footprints Project. While we can develop this project flexibly, and we are keen to do more work using the DECC emissions data (indeed this will be vital to all work on area emissions), the lack of reference to Footprint in the menu of outcome indicators could severely limit the project's ability to get local authority and Community Planning Partnership (CPP) buy-in to do real projects that could lead to emissions reduction, both in relation to the DECC national emissions inventory as well as consumption/Footprint impacts. It is vital that we maintain an emphasis on what it is we are trying to achieve, and this is ultimately to 'reduce the local and global environmental impact of our consumption and production'. By potentially undermining work in this area, which has used the Footprint approach as a means to an end, the Outcome Indicators Project could result in a significant set back within local authorities and CPPs.
4. SSN is currently a well respected voice with local authorities, and it has had the ability to support and encourage work on climate change to date. Undermining work on Footprinting at this point is likely to have the effect of undermining our work across the board, with local authorities potentially becoming unwilling to take what will appear to them as a gamble on the validity of the approaches we propose. This also has the potential to undermine our ability to mainstream the Footprint approach across local authority and CPP functions, as is the plan for the next steps of the Local Footprints Project – and which many Footprint users in local authorities are aiming to do in the years ahead.

Recommendations:

- **Retaining Footprint as an Outcome Indicator, alongside the DECC Data**

Considering the issues outlined above, we would recommend the inclusion of Footprint (ecological and/or the more focused GHG/Carbon Footprint), alongside the production-based DECC statistics. We would argue that this would do justice to SOAs contributing to the national performance framework and the 'production and consumption' National Outcome in particular, and indeed the broad scope of the Climate Change (Scotland) Act (where reporting on consumption emissions is recognised). Including Footprint as an outcome indicator would also set a basis for the development of improved production and consumption reporting and emissions reduction work into the future. We would argue that climate change is a significant and complex enough issue to warrant inclusion of at least two valid and useful outcome indicators.

- **Ensure Clear and Effective Communication to Local Authority Practitioners**

It will be vital that the Outcome Indicators Project provides clear communication when the Outcome Indicators Menu is released. This matter was discussed at the meeting on 5th October, with unanimous agreement that communication about the content and use of the menu will be vital, especially in explaining how work on Footprinting can be maintained regardless of what is recommended as suitable outcome indicators. SSN and WWF Scotland welcome the Improvement Services plans to ensure good communication on the use of outcome indicators, and we welcome the opportunity to help support this.

- **Continue to Invest in Improving Footprint/Consumption Data**

We would recommend that Scotland should continue to improve work on consumption emissions and wider ecological impacts of consumption by investing further in the Footprint data and REAP analysis.

⁴ 10:10 Campaign – Draft Policy Briefing Paper, September 2009

⁵ <http://news.bbc.co.uk/1/hi/sci/tech/8283909.stm>

The Scottish Government has sought to place Scotland at the forefront of climate change policy and practice. The National Performance Framework seeks to reduce the global and local environmental impact of consumption and production, the suite of National Indicators includes an indicator on Ecological Footprint and the Climate Change (Scotland) Act includes a commitment to report on consumption emissions. Additionally, the Carbon Assessment Project looking at the carbon impact of government spend takes a consumption based approach, and projects supported by the Climate Challenge Fund consistently seek to engage people on the basis of their personal, household or community consumption impacts. Finally, work in Scotland on Footprinting, currently supported by the Local Footprints Project, is seen to be of leadership class by other countries, regions and localities interested in similar approaches. For all these reasons we would contend that it would be most appropriate to retain Footprint in the new menu of outcome indicators, and to continue to invest in improving the Footprint approach.

SSN and WWF Scotland would welcome the opportunity to continue working with national decision-makers and key stakeholders, including local authority practitioners, to improve the use of Footprint and Footprint analysis, and to link this more directly to the DECC emissions data sets. Improvement Service plans to develop 'logic modeling' and 'contribution analysis' on public health outcomes could offer useful approaches that could be similarly applied to Footprint Outcomes. Our intention is to support and improve local authority and CPP work on reducing the global environmental impact of consumption and production, most notably greenhouse gas emissions reduction and the promotion of sustainable development. We would again urge retaining Footprint in the menu of outcome indicators, supplemented with the DECC data, and to continue to improve the practical use of these data sets and methodologies at local level.

Finally, SSN members have raised concerns about the lack of any climate change adaptation indicator akin to National Indicator 188 in England. We would be interested in knowing how the SOA and Outcome Indicators Project will advise CPPs on the integration of climate change adaptation into SOAs, and to work with national stakeholders to progress work in this area in the future.

Yours,

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