Public Sector Report on Compliance with Climate Change Duties 2020 Template (excel format) - 2019-2020 Factors

PART 1 Profile of Reporting Body

1a Name of reporting body

Provide the name of the listed body (the "body") which prepared this report.

Moray Council

1b Type of body

Select from the options below

Local Government

1c Highest number of full-time equivalent staff in the body during the report year

3492

1d Metrics used by the body

Specify the metrics that the body uses to assess its performance in relation to climate change and sustainability.

Metric	Units	Value	Comments
	#N/A		None
	#N/A		
	#N/A		
Other (specify in comments)			

1e Overall budget of the body

Specify approximate £/annum for the report year.

Budget	Budget Comments
£203,900,000.00	

1f Report year

Specify the report year.

Report year	Report year comments
2019/20 (Financial year)	

1g Context

Provide a summary of the body's nature and functions that are relevant to climate change reporting.

Moray Council has an extensive remit and is responsible for the following functions related to climate change. Development Planning, Buildings Standards and Development Management. Waste Management, flood alleviation, fleet services, biodiversity and countryside management. The Council has a significant portfolio of buildings and assets and has responsibilities in relation to fuel poverty, Council house building, design services, energy management and asset & estate management.

PART 2 Governance, Management and Strategy

Governance and management

2a How is climate change governed in the body?

Provide a summary of the roles performed by the body's governance bodies and members in relation to climate change. If any of the body's activities in relation to climate change sit outside its own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify these activities and the governance arrangements. Provide a diagram / chart to outline the governance structure within the body.

The Moray Sustainable Energy Action Plan (SEAP) sets outs the Council's priorities for climate change and is reported to the Council's Policy and Resources Committee.

A Climate Change Strategy is currently in preparation with an expected implementation date of March 2021. It is proposed that the strategy will report bi-annually to committee. The draft strategy defines key governance roles as follows
Am Elected Member (currently the Chair of the Strategy Working Group) will be the organisation's Climate Change Champion.
The Chief Executive will be the corporate champion and have responsibility to promote the Climate Change Strategy at Corporate and Community Planning level.
The Depute Chief Executive (Economic Development, Planning and Infrastructure) will be the lead officer for co-ordination and management of the Strategy internally within the Council supported by the Head of Housing and Property Services.

Applicable to the 2019-20 reporting year, services such as procurement, fleet, energy and waste etc. report to the respective committees on progress.

<Insert Diagram Here or Attach File>

2b **How is climate change action managed and embedded in the body?**

Provide a summary of how decision-making in relation to climate change action by the body is managed and how responsibility is allocated to the body's senior staff, departmental heads etc. If any such decision-making sits outside the body's own governance arrangements (in relation to, for example, land use, adaptation, transport, business travel, waste, information and communication technology, procurement or behaviour change), identify how this is managed and how responsibility is allocated outside the body. Provide a diagram to show how responsibility is allocated to the body's senior staff, departmental heads etc.

A Climate Change Strategy is currently in preparation with an expected implementation date of March 2021. The draft strategy defines key management duties as follows
Heads of Service will have responsibility and accountability for climate change actions and targets within their service area, although they may delegate their responsibility to third tier managers to ensure that day to day management responsibilities are clear and that delegated decision making is undertaken at the appropriate level.
Each key service area will have a lead officer with defined areas of responsibility, e.g. with respect to reporting performance, embedding in processes and procedures etc.

Applicable to the 2019-20 reporting year, services such as procurement, fleet, energy and waste etc. are managed as part of overall service delivery.

<Insert Diagram Here or Attach File>

Strategy

2c **Does the body have specific climate change mitigation and adaptation objectives in its corporate plan or similar document?**

Provide a brief summary of objectives if they exist.

Wording of objective	Name of document	Document Link
Reduce the Council's energy consumption by 2% per annum on a year to year basis.	Moray Council Energy Strategy and Policy	http://www.moray.gov.uk/downloads/file85115.pdf
In June 2019, the Council's Climate Emergency declaration included a requirement for a Climate Change Strategy with a net zero carbon target for 2030.		
The Council's Corporate Plan 2019 – 2024 identifies the environment as a key principle in the delivery of the Council's priorities. "Environment – look after the world we live in to protect it for the future" and for Moray Council to be "A resource efficient, carbon neutral council that works with partners to mitigate the worst effects of Climate Change, to create a resilient, fair and more sustainable future for everyone within Moray".	Moray Council Corporate Plan 2019 -24	http://www.moray.gov.uk/downloads/file119976.pdf

2d **Does the body have a climate change plan or strategy?**

If yes, provide the name of any such document and details of where a copy of the document may be obtained or accessed.

Not during 2019-20. A Climate Change Strategy is currently being prepared with a targeted adoption date of March 2021.
http://www.moray.gov.uk/downloads/file133902.pdf

2e **Does the body have any plans or strategies covering the following areas that include climate change?**
Provide the name of any such document and the timeframe covered.

Topic area	Name of document	Link	Time period covered	Comments
Adaptation				
Business travel				
Staff Travel				
Energy efficiency	Moray Council Energy Strategy	http://www.moray.gov.uk/downloads/file85115.pdf		
Fleet transport				
ICT				
Renewable energy				
Sustainable/renewable heat				
Waste management				
Water and sewerage				
Land Use	Moray Local Development Plan 2015 Climate Change Supplementary Guidance	http://www.moray.gov.uk/downloads/file108743.pdf http://www.moray.gov.uk/downloads/file101064.pdf	2015-2020	
Other				

2f **What are the body's top 5 priorities for climate change governance, management and strategy for the year ahead?**
Provide a brief summary of the body's areas and activities of focus for the year ahead.

Key priority is the on-going development, adoption and implementation of the draft Climate Change Strategy, which will in trun define the organisation response to this issue. Determination of both short and long term priorities are a key element of the Climate Change Strategy

2g **Has the body used the Climate Change Assessment Tool (a) or equivalent tool to self-assess its capability / performance?**
If yes, please provide details of the key findings and resultant action taken.

(a) This refers to the tool developed by Resource Efficient Scotland for self-assessing an organisation's capability / performance in relation to climate change.

Yes, completed during reporting year 2017
The results are as follows
Organisation Score
Governance 35.7
Emissions 26.7
Adaptation 7.1
Behaviour 10.0
Procurement 6.3
Overall 18.9

Further information

2h **Supporting information and best practice**
Provide any other relevant supporting information and any examples of best practice by the body in relation to governance, management and strategy.

PART 3 Corporate Emissions, Targets and Project Data

Emissions

3a **Emissions from the start of the year which the body uses as a baseline (for its carbon footprint) to the end of the report year**
Complete the following table using the greenhouse gas emissions total for the body calculated on the same basis as for its annual carbon footprint / management reporting or, where applicable, its sustainability reporting. Include greenhouse gas emissions from the body's estate and operations (a) (measured and reported in accordance with Scopes 1 & 2 and, to the extent applicable, selected Scope 3 of the Greenhouse Gas Protocol (b). If data is not available for any year from the start of the baseline year to the end of the report year, provide an explanation in the comments column.

(a) No information is required on the effect of the body on emissions which are not from its estate and operations.

(b) This refers to the document entitled "The greenhouse gas protocol. A corporate accounting and reporting standard (revised edition)", World Business Council for Sustainable Development, Geneva, Switzerland / World Resources Institute, Washington DC, USA (2004), ISBN: 1-56973-568-9.

Reference year	Year	Year type	Scope 1	Scope 2	Scope 3	Total	Units	Comments
Baseline Year						-	tCO_2e	For the reporting year 2019/20 Moray did not calculate a carbon footprint
Year 1 carbon footprint	#N/A					-	tCO_2e	
Year 2 carbon footprint	#N/A					-	tCO_2e	
Year 3 carbon footprint	#N/A					-	tCO_2e	
Year 4 carbon footprint	#N/A					-	tCO_2e	
Year 5 carbon footprint	#N/A					-	tCO_2e	
Year 6 carbon footprint	#N/A					-	tCO_2e	
Year 7 carbon footprint	#N/A					-	tCO_2e	
Year 8 carbon footprint	#N/A					-	tCO_2e	
Year 9 carbon footprint	#N/A					-	tCO_2e	
Year 10 carbon footprint	#N/A					-	tCO_2e	
Year 11 carbon footprint	#N/A					-	tCO_2e	
Year 12 carbon footprint	#N/A					-	tCO_2e	
Year 13 carbon footprint	#N/A					-	tCO_2e	
Year 14 carbon footprint	#N/A					-	tCO_2e	
Year 15 carbon footprint	#N/A					-	tCO_2e	

3b Breakdown of emissions sources

Complete the following table with the breakdown of emission sources from the body's most recent carbon footprint (greenhouse gas inventory); this should correspond to the last entry in the table in 3(a) above. Use the 'Comments' column to explain what is included within each category of emission source entered in the first column. If, for any such category of emission source, it is not possible to provide a simple emission factor(a) leave the field for the
emission factor blank and provide the total emissions for that category of emission source in the 'Emissions' column.

(a) Emissions factors are published annually by the UK Government Department for Environment, Food and Rural Affairs (Defra)

Please select - Emission Factor Year: 2019

Emission source	Scope	Consumption data	Units	Emission factor	Units	Emissions (tCO_2e)	Comments
Diesel (average biofuel blend)	Scope 1	1,339,141	litres	2.59411	kg CO2e/litre	3,473.9	
Gas oil litre	Scope 1	196,177	litres	2.75821	kg CO2e/litre	541.1	
Petrol (average biofuel blend)	Scope 1	12,903	litres	2.20904	kg CO2e/litre	28.5	
Batteries Recycling	Scope 3	1	tonnes	64.63650	kg CO2e/tonne	0.1	
Refuse Municipal to Landfill	Scope 3	19,887	tonnes	586.51380	kgCO2e/tonne	11,664.0	
Refuse Commercial & Industrial to Landfill	Scope 3	2,827	tonnes	99.75920	kgCO2e/tonne	282.0	
Organic Food & Drink Composting	Scope 3	8,260	tonnes	10.20390	kgCO2e/tonne	84.3	
Organic Garden Waste Composting	Scope 3	2,605	tonnes	10.20390	kgCO2e/tonne	26.6	
Paper & Board (Mixed) Recycling	Scope 3	2,152	tonnes	21.35380	kgCO2e/tonne	46.0	
WEEE (Mixed) Recycling	Scope 3	884	tonnes	21.35380	kgCO2e/tonne	18.9	
Glass Recycling	Scope 3	1,483	tonnes	21.35380	kgCO2e/tonne	31.7	
Plastics (Average) Recycling	Scope 3	881	tonnes	21.35380	kgCO2e/tonne	18.8	
Metal Cans (Mixed) & Metal Scrap Recycling	Scope 3	1,059	tonnes	21.35380	kgCO2e/tonne	22.6	
Mixed recycling	Scope 3	349	tonnes	21.35400	kg CO2e/tonne	7.5	
Grid Electricity (generation)	Scope 2	14,194,878	kWh	0.25560	kg CO2e/kWh	3,628.2	
Grid Electricity (transmission & distribution losses)	Scope 3	14,194,878	kWh	0.02170	kg CO2e/kWh	308.0	
Natural Gas	Scope 1	23,562,259	kWh	0.18385	kg CO2e/kWh	4,331.9	
Gas oil kWh	Scope 1	2,867,503	kWh	0.25676	kg CO2e/kWh	736.3	
Water - Supply	Scope 3	135,563	m3	0.34400	kg CO2e/m3	46.6	
Water - Treatment	Scope 3	128,785	m3	0.70800	kg CO2e/m3	91.2	
Biomass (Wood Chips)kWh	Scope 1	1,656,260	kWh	0.01563	kg CO2e/kWh	25.9	
Biomass (Wood Pellets) kWh	Scope 1	1,046,010	kWh	0.01563	kg CO2e/kWh	16.3	
Purchased Heat and Steam	Scope 2	54,990	kWh	0.17606	kg CO2e/kWh	9.7	
			#N/A	#N/A	#N/A	#N/A	

			#N/A	#N/A	#N/A	#N/A	
			#N/A	#N/A	#N/A	#N/A	
					#N/A	25,440.0	

3c Generation, consumption and export of renewable energy

Provide a summary of the body's annual renewable generation (if any), and whether it is used or exported by the body.

	Renewable Electricty		Renewable Heat		
Technology	**Total consumed by the body (kWh)**	**Total exported (kWh)**	**Total consumed by the body (kWh)**	**Total exported (kWh)**	**Comments**
Biomass			2,129,380	0	4 schools including supply by 3rd parties
Solar thermal			17,175	0	Forres Pool
Solar PV	34,911	-		0	Elgin HS

Targets

3d Organisational targets

List all of the body's targets of relevance to its climate change duties. Where applicable, overall carbon targets and any separate land use, energy efficiency, waste, water, information and communication technology, transport, travel and heat targets should be included.

Name of target	Type of target	Target	Units	Boundary/scope of target	Year used as baseline	Baseline figure	Units of baseline	Target completion year	Progress against target	Comments
Energy Policy & Strategy	percentage	2	KWh reduction	Energy use in buildings	2012/13	51,235,033	kWh		ahead of target	annual rolling target for non-domestic buildings

Projects and changes

3e Estimated total annual carbon savings from all projects implemented by the body in the report year

If no projects were implemented against an emissions source, enter "0".
If the body does not have any information for an emissions source, enter "Unknown".
If the body does not include the emissions source in its carbon footprint, enter "N/A".

Emissions source	Total estimated annual carbon savings (tCO_2e)	Comments
Electricity		
Natural gas	47	
Other heating fuels		
Waste		
Water and sewerage		
Travel	339	New more fuel efficient vehicles and expansion of electric vehicle fleet
Fleet transport		
Other 1 (specify in comments)		
Other 2 (specify in comments)		
Other 3 (specify in comments)		
Total	**386**	

3f Detail the top 10 carbon reduction projects to be carried out by the body in the report year

Provide details of the 10 projects which are estimated to achieve the highest carbon savings during report year.

Project name	Funding source	First full year of CO_2e savings	Are these savings figures estimated or actual?	Capital cost (£)	Operational cost (£/annum)	Project lifetime (years)	Primary fuel/emission source saved	Estimated carbon savings per year (tCO_2e/annum)	Estimated costs savings (£/annum)	Behaviour Change	Comments
Misc Insulation Projects	Corporate	2020/21	Estimated	2,500		20	Natural Gas	5	900		
LED lighting replacement	Corporate	2020/21	Estimated	6,265		20	Natural Gas	17	2820		
Misc Housekeeping measure	Corporate	2020/21	Estimated			20	Natural Gas	25	3800	Good housekeeping	
Misc Housekeeping measure	Corporate	2020/21	Estimated			20	Grid Electricity (gen	22	5000	Good housekeeping	
Misc Housekeeping measure	Corporate	2020/21	Estimated			20	Grid Electricity (tra	2	0	Good housekeeping	

3g **Estimated decrease or increase in the body's emissions attributed to factors (not reported elsewhere in this form) in the report year**
If the emissions increased or decreased due to any such factor in the report year, provide an estimate of the amount and direction

Emissions source	Total estimated annual emissions (tCO_2e)	Increase or decrease in emissions	Comments
Estate changes			
Service provision			
Staff numbers			
Other 1 (specify in comments)			
Other 2 (specify in comments)			
Other 3 (specify in comments)			
Total		-	

3h **Anticipated annual carbon savings from all projects implemented by the body in the year ahead**
If no projects are expected to be implemented against an emissions source, enter "0".
If the organisation does not have any information for an emissions source, enter "Unknown".
If the organisation does not include the emissions source in its carbon footprint, enter "N/A".

Emissions source	Total estimated annual carbon savings (tCO_2e)	Comments
Electricity		
Natural gas		
Other heating fuels		
Waste		
Water and sewerage		
Travel		
Fleet Transport	300	
Other 1 (specify in comments)		
Other 2 (specify in comments)		
Other 3 (specify in comments)		
Total	**300**	

3i **Estimated decrease or increase in emissions from other sources in the year ahead**
If the body's corporate emissions are likely to increase or decrease for any other reason in the year ahead, provide an estimate of the amount and direction.

Emissions source	Total estimated annual emissions (tCO_2e)	Increase or decrease in emissions	Comments
Estate changes			
Service provision			
Staff numbers			
Other 1 (specify in comments)			
Other 2 (specify in comments)			
Other 3 (specify in comments)			
Total		-	

3j **Total carbon reduction project savings since the start of the year which the body used as a baseline for its carbon footprint**

If the body has data available, estimate the total emissions savings made from projects since the start of that year ("the baseline year").

Total savings	Total estimated emissions savings (tCO_2e)	Comments
Total project savings since baseline year		

Further information

3k **Supporting information and best practice**
Provide any other relevant supporting information and any examples of best practice by the body in relation to corporate emissions, targets and projects.

PART 4 Adaptation

Assessing and managing risk

4a **Has the body assessed current and future climate-related risks?**
If yes, provide a reference or link to any such risk assessment(s).

Climate change adaptation risks are identified and assessed as part of the SEA process required for plans and policies. The Council participates in the local flood management districts working in partnership with neighbouring local authorities, Scottish Water and SEPA. The Findhorn, Nairn and Speyside Local Flood Risk Management Plan was published in June 2016 and is currently in the implementation phase. The plans for cycle 2 are currently being prepared and these will be implemented between 2022 and 2028.

4b **What arrangements does the body have in place to manage climate-related risks?**
Provide details of any climate change adaptation strategies, action plans and risk management procedures, and any climate change adaptation policies which apply across the body.

Through surface water management plans the Council will aim to reduce the amount of surface water and infiltration entering the combined sewers, promote sustainable drainage solutions in development proposals aimed at maximising the ecological and amenity benefit. This approach is embedded within the Moray Local Development Plan 2020. Flood protection schemes are currently designed with a 20% allowance for climate change, however this allowance is currently under review and is likely to increase in future. The Council develops catchment based flood risk management plans, which identify flood risk and proposed mitigation factoring in climate change. These plans adopt an integrated catchment based approach to flood risk management including links to River Basin Management Plans.

The Moray Local Development Plan 2020 provides the policy framework for promoting climate change adaption and it is taken into consideration when determining development proposals. There is a specific policy on coastal erosion and requirements for biodiversity enhancement and compensatory tree planting in Moray.

Taking action

4c **What action has the body taken to adapt to climate change?**
Include details of work to increase awareness of the need to adapt to climate change and build the capacity of staff and stakeholders to assess risk and implement action.

Local Development Plan policies require development to avoid areas at risk of flooding, coastal erosion and landslip. Flood risk assessments and drainage impact assessments are required for new developments. The Council check that climate change is taken into account in developers flood risk assessments and sustainable drainage (SUDS) designs. Ensuring new development is planned to minimise future vulnerability in a changing climate. Specifically a 20% increase in peak river flow volume or peak rainfall intensity must be applied to all designs including soakaways.

The Moray Local Development Plan 2020 promotes a masterplan approach to the development of large scale sites and work in partnership with key agencies such as NatureScot and SEPA to embed climate change adaption into development through blue and green networks, biodiversity and habitat connectivity. A specific biodiversity policy requires all new development to enhance biodiversity with developments of 10 or more houses required to submit a biodiversity plan.

4d **Where applicable, what progress has the body made in delivering the policies and proposals referenced N1, N2, N3, B1, B2, B3, S1, S2 and S3 in the Scottish Climate Change Adaptation Programme(a) ("the Programme")?**
If the body is listed in the Programme as an body responsible for the delivery of one or more policies and proposals under the objectives N1, N2, N3, B1, B2, B3, S1, S2 and S3, provide details of the progress made by the body in delivering each policy or proposal in the report year. If it is not responsible for delivering any policy or proposal under a particular objective enter "N/A" in the 'Delivery progress' column for that objective.

(a) This refers to the programme for adaptation to climate change laid before the Scottish Parliament under section 53(2) of the Climate Change (Scotland) Act 2009 (asp 12) which currently has effect. The most recent one is entitled “Climate Ready Scotland: Scottish Climate Change Adaptation Programme” dated May 2014

Objective	Objective reference	Theme	Policy / Proposal reference	Delivery progress made	Comments
Understand the effects of climate change and their impacts on the natural environment.	N1	Natural Environment		The Council has prepared and is responsible for the implementation of flood risk management plans and surface water management plans	
Support a healthy and diverse natural environment with capacity to adapt.	N2	Natural Environment		The Local Development Plan promotes the enhancement and protection of biodiversity and the role the natural environment has in increasing resilience to climate change and its impacts.	
Sustain and enhance the benefits, goods and services that the natural environment provides.	N3	Natural Environment		As N2	
Understand the effects of climate change and their impacts on buildings and infrastructure networks.	B1	Buildings and infrastructure networks		As N1	
Provide the knowledge, skills and tools to manage climate change impacts on buildings and infrastructure.	B2	Buildings and infrastructure networks			
Increase the resilience of buildings and infrastructure networks to sustain and enhance the benefits and services provided.	B3	Buildings and infrastructure networks			
Understand the effects of climate change and their impacts on people, homes and communities.	S1	Society			
Increase the awareness of the impacts of climate change to enable people to adapt to future extreme weather events.	S2	Society		Extensive public consultation was undertaken during preparation of Moray Local Development Plan 2020 (where biodiversity and climate change were identified as key issues) including numerous public exhibitions and a short film on the environment and biodiversity with contributions from SEPA, Scottish Forestry and NatureScot.	
Support our health services and emergency responders to enable them to respond effectively to the increased pressures associated with a changing climate.	S3	Society			

Review, monitoring and evaluation

4e **What arrangements does the body have in place to review current and future climate risks?**
Provide details of arrangements to review current and future climate risks, for example, what timescales are in place to review the climate change risk assessments referred to in Question 4(a) and adaptation strategies, action plans, procedures and policies in Question 4(b).

Continued work on flood risk management and surface water management plans and application of SEA and EIA process to plans and policies and development proposals.

4f **What arrangements does the body have in place to monitor and evaluate the impact of the adaptation actions?**
Please provide details of monitoring and evaluation criteria and adaptation indicators used to assess the effectiveness of actions detailed under Question 4(c) and Question 4(d).

Flood protection schemes are managed and maintained to ensure steady state performance through the life cycle of the scheme.

Future priorities for adaptation

4g **What are the body's top 5 climate change adaptation priorities for the year ahead?**
Provide a summary of the areas and activities of focus for the year ahead.

Implementation of Moray Local Development Plan policies to control woodland removal and secure compensatory planting where necessary. Deliver appropriate biodiversity enhancement on all new development sites including wildflower meadows, bat and bird boxes, hedgehog highways, landscaping schemes for varying weather. Promote innovative blue and green networks, habitat connectivity and habitat creation in new developments. Prepare and adopt additional guidance to support Moray LDP to support planting for pollinators.

Further information

4h **Supporting information and best practice**
Provide any other relevant supporting information and any examples of best practice by the body in relation to adaption.

PART 5 Procurement

5a **How have procurement policies contributed to compliance with climate change duties?**

Provide information relating to how the procurement policies of the body have contributed to its compliance with climate changes duties.

The Council's Procurement Strategy 2019 – 2020 states: The Council commits to improve our management practices to reduce our impact on the environment. Our procurement objectives in this area link to the Councils ten year strategic plan and include:
• Increase the areas recycling rates
• Reduce the biodegradable waste to landfill
• Reduce greenhouse gases by considering delivery and transportation issues, utilising zero or low carbon technologies
• Support the development of sustainable construction
• Encourage our contractors to care for the environment by minimising environmental impacts
• Reduce energy use
• Promote the use of renewable energy sources.

Sustainability is a key strategic objective in ensuring Moray achieves "Best Value" whilst delivering on procurement duties and responsibilities under the Procurement Reform (Scotland) Act 2014. Activities around sustainability include:
• Procurement team challenging each project to consider sustainability issues at stage one of the development of the requirement
• Performance reported annually based on Moray categorisation of benefits
• The Council will use the Scottish Government Flexible Framework tool to measure our progress against organisational procurement strategies and help build an action plan for future developments in this area
• Make use of the Scottish Government prioritisation tool to establish the sustainable priorities for each Council service (annually)

5b **How has procurement activity contributed to compliance with climate change duties?**

Provide information relating to how procurement activity by the body has contributed to its compliance with climate changes duties.

During the past year, 15 of our tendered contracts have included specific terms in respect of sustainable construction, greenhouse gases, energy efficiency, waste disposal that contribute to climate change duties.

Further information

5c **Supporting information and best practice**
Provide any other relevant supporting information and any examples of best practice by the body in relation to procurement.

Each individual Procurement project includes development of a Procurement Strategy which forces the consideration of including sustainability clauses / terms in the specification and at the evaluation stages. A standard weighted question on sustainability at tender evaluation stage has been introduced which requires that an organisation must provide a statement detailing their organisations' corporate approach to sustainability (including how they promote recycling, reducing and re-using initiatives to minimise the impact of their supply chain on the environment).

PART 6 Validation and Declaration

6a Internal validation process

Briefly describe the body's internal validation process, if any, of the data or information contained within this report.

None

6b Peer validation process

Briefly describe the body's peer validation process, if any, of the data or information contained within this report.

None

6c External validation process

Briefly describe the body's external validation process, if any, of the data or information contained within this report.

None

6d No Validation Process

If any information provided in this report has not been validated, identify the information in question and explain why it has not been validated.

6e Declaration

I confirm that the information in this report is accurate and provides a fair representation of the body's performance in relation to climate change.

Name:	Moray Macleod
Role in the body:	Acting Head of Housing and Property Services
Date:	30/11/2020