Keep Scotland Beautiful is the charity that campaigns, acts and educates on a range of local, national and global issues to change behaviour and improve the quality of people’s lives and the places they care for. We are committed to making Scotland clean, green and sustainable.

We work with organisations, schools, communities and individuals to help reduce carbon emissions, improve the quality of local environments and adapt to the impacts of climate change.

We support the ambitions of the United Nations Sustainable Development Goals, or Global Goals. Having recognised the strategic importance of the Global Goals to our work, in particular with young people, we seek to play an active role in supporting the targets of all 17 Global Goals. We are an active member of the Sustainable Development Goals Scotland Network and the UKSSD.

We were pleased to have our opinions heard as part of a Phase One workshop, and during Phase Two: Expert Engagement, of the consultation undertaken by the National Performance Framework Team of the Scottish Government.

We acknowledge that the following proposed National Objectives link most closely to our work:

- We have a globally competitive, entrepreneurial, inclusive and sustainable economy.
- We live in communities that are inclusive, empowered, resilient and safe.
- We are well educated, skilled and able to contribute to society.
- We value, enjoy, protect and enhance our environment.

Our response

Keep Scotland Beautiful welcomes the opportunity to respond to the Environment, Climate Change and Land Reform (ECCLR) Committee which is seeking views on the National Outcomes and Indicators most closely linked to its remit, under Section 2 of the Community Empowerment (Scotland) Act 2015.

We understand that the ECCLR Committee will in turn feedback a collated response to the Local Government and Communities Committee which has been designated as the Lead Committee for this review.

Following the brief analysis that we have been able to complete in the short timeframe given for the National Outcomes Review, we would like to make the following comments and recommendations.
General observations

We generally welcome the reviewed National Outcomes, the alignment to the Global Goals and the simplified framework and language.

We are pleased to see the refresh of the Purpose and a new Values Statement, and welcome the addition of the important word ‘sustainable’ to the Purpose.

While we recognise and approve of the creation of a new Outcome for the environment, we believe that the environment should sit clearly across all Outcomes. We may have lost the opportunity to show how the quality of our environment underpins all aspects of life, and links across all other Outcomes.

We generally support the reduction from 16 to 11 Outcomes and the increase from 55 to 79 Indicators. However, we believe that more work needs to be done to ensure the Indicators are more specific and measurable.

We look forward to seeing the development of the National Outcomes and Indicators. And, we would welcome further information highlighting clear links with policy areas, particularly with regards to areas which are less clear to identify within indicators, for example the Climate Change Bill, Litter Strategy, Good Food Nation policy, Circular Economy Strategy for Scotland, Extended Producer Responsibility and Transport Bill.

Response to questions from ECCLR Committee

- How the National Outcomes and National Indicators have changed.

We believe that there is a lack of interlinkage between the Indicators primarily associated with ‘We value, enjoy protect and enhance our environment’ with other Indicators. We would expect to see environmental Indicators embedded across all Outcomes.

It would be helpful if the outcomes were numbered or given concise descriptors similar to the Global Goals to aid identification and discussion.

Clear measurables have been removed from Indicators and they are less quantifiable and specific. We would question if there is a layer below these still to be developed and call for more work to be done to develop the Indicators.

Given the decline in local environmental quality across Scotland we are disappointed there is no specific indicator that addresses this either under the Outcome for the Environment or Communities.

We are surprised to see that there is no Indicator for circular economy, however we recognise this may be covered by the ‘waste generated’ Indicator that sits below ‘we value, enjoy, protect and enhance our environment’. In addition to this, we note the lack of inclusion of Climate Change in any Outcomes or Indicators. Furthermore, Adaptation and Mitigation do not feature, both of these are significant features of the Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015.
Based on the four Outcomes we have identified which we most strongly support through our charitable activity, we believe that there is more to be done to make connections between the Outcomes and the Indicators.

While there is an acknowledgement that “…some National Indicators would not necessarily just sit under one National Outcome…” we do not feel that the second table in Annex 8 includes all the Indicators that relate to each of the relevant Outcomes.

Particularly related to our work, for the Outcome ‘We live in communities that are inclusive, empowered, resilient and safe” we feel there should be links to carbon footprint, confidence of children and young people, young people’s participation, biodiversity, waste generated and visits to the outdoors.

We would recommend that the Indicator ‘Access to green and blue space’ should have the word ‘quality’ inserted in it, as we know that quality green and blue space is important to communities, in particular local environmental quality (litter, dog fouling, etc).

With regards to the Outcome ‘we are well educated, skilled and able to contribute to society’, we have some concern about the lack of linkage between this outcome and ‘we grow up loved, safe and respected so that we can realise our full potential’ as there are no Indicators from this linked to the ‘we are well educated, skilled and able to contribute to society’ Outcome.

With reference to ‘we value, enjoy, protect and enhance our environment’ we feel that there should be an acknowledgement of young people’s participation as a significant indicator due to the central role that young people have in driving change, something that is closely linked to our work on Sustainable Development Education.

In addition to this, there is a lack of acknowledgement of where the Indicators from the ‘we value, enjoy, protect and enhance our environment’ Outcome link in to the other Outcomes. We feel in particular, that waste generated, energy from renewable sources and biodiversity should be acknowledged as touching a wide range of other Outcomes, particularly:

- we have a globally competitive, entrepreneurial, inclusive and sustainable economy;
- we are open, connected and make a positive contribution internationally;
- we live in communities that are inclusive, empowered, resilient and safe;
- we have thriving and innovative businesses, with quality jobs and fair work for everyone; and
- we are healthy and active.

We welcome the refocussed Outcome for children as we believe that particularly in this, the Year of Young People, and as a legacy from this, our young people must be supported to develop the skills to help them use their voices effectively. This is of vital importance to us as a charity because we provide a range of education
initiatives for children, young people and educators. As we work to realise the vision of our world in 2030, young people, who will mature in the next 15 years, will play an absolutely crucial part. This is why our Eco-Schools Scotland programme has been refreshed and aligned to the Global Goals.

Overall, we feel that there is more to be done to clarify the Outcomes and Indicators and to ensure that the interlinkage between the different Outcomes, particularly related to the environment, is much clearer, highlighting the central role that quality of environment plays.

- **Whether these changes are appropriate particularly in relation to the marine environment.**

The current Indicator (51) for the marine environment specifically focusses on fishing and is measurable. The proposed National Outcomes now includes two Indicators, one for the marine environment and another for sustainability of fish stocks, neither have a descriptor so it is not clear what is covered. However, if protection of the marine environment includes Marine Protected Areas, preventing and significantly reducing coastal and marine litter pollution of all kinds, particularly from land, as outlined in the Global Goals, then this is a step in the right direction and to be welcomed.

- **Was the wider consultation exercise sufficient?**

Despite being involved in the Open Government Network, and involved in both phases of the early consultation undertaken to date, we don’t not feel this final stage of the process has been as transparent and inclusive as it could have been. Committees do not appear to have consulted widely and a very limited time over a key holiday period was given for responses to be made.

We understand there is to be no further consultation on this process, and feel strongly that there should be, particularly given the opportunities to strengthen the descriptors and further align the Indicators across Outcomes.

- **Have the Sustainable Development Goals been incorporated into the NPF in such a way as to ensure that they are fully implemented.**

We are fully supportive of the Outcomes being aligned with the Global Goals and welcome the more accessible and streamlined presentation of the information in graphical format. We would be keen to see the links to the Global Goals in a tabular format too.

The Global Goals are generally mapped better than the Indicators, however there are some examples where Global Goals highlighted in Annex 6 against Outcomes do not link directly to Indicators. A significant example of this is the fact that the Global Goal for Climate Action sits under the environment Outcome, but there is no
Indicator related to climate change. We would call for more work to be done to ensure all links between Outcome and Indicators are made to the Global Goals.

With reference to measurement, we acknowledge that there is a legal obligation to report progress against the National Indicators, and that this will continue to be met through the Scotland Performs website, which is to be redeveloped. We would like to see the data disaggregated by geographic location, and in a Scottish context broken down in such a way that it correspond to the Scottish Index of Multiple Deprivation.

In addition, we would urge that any developed reporting system to evidence outcomes against the Global Goals clearly links to the reporting mechanism proposed for the UK through the Office for National Statistics (ONS) in order to report to The United Nations.

We understand that dual reporting against both sets of indicators may be necessary for up to a year, and that reporting of other frameworks, policies and strategies will continue separately. However, while this may not be easy to achieve, we feel that these should ultimately all be integrated into the new Framework as soon as possible.

Conclusion

In summary, we welcome the review of the National Outcomes. There is a great opportunity here to ensure that the Indicators for each Outcome strengthen each other and are not seen in isolation.

We commend the Scottish Government on its leadership within the UK and internationally to integrate the Global Goals into their performance framework.

We are keen to see further integration of the Global Goals across Scottish Government policy and legislation in the coming months and years.

We are committed to playing our part, and would welcome the development of a Scotland wide Implementation Plan so that the National Indicators are communicated effectively to the people of Scotland, making them understandable and relevant to support them to engage and take ownership.