

Scottish Government Draft Environment Strategy – EAUC/LFSS Full Draft Response

Vision and outcomes

Question 1: Do you agree with the vision of the Environment Strategy?

We broadly agree with the vision of the draft Environment Strategy. However, we believe the vision could be strengthened by explicitly recognising Scotland's historical contribution to both climate change and nature loss, and by acknowledging the responsibility that comes with this legacy. Scotland has benefited from industrialisation and high historic emissions ([Carbon Brief, 2023](#)), so a credible vision must reflect the need to go further and faster than 'net zero' alone in order to play our fair share in tackling the global emergency.

In addition, paragraph 3 of the vision context currently frames biodiversity decline as a global issue. While this is true, Scotland's own biodiversity intactness is particularly poor. The vision should clearly state the extent of biodiversity loss here, as this level of ecological degradation is not only an emergency, but a national catastrophe that requires urgent domestic action.

Finally, paragraph 5 of the vision narrows outdoor, nature-based education benefits to children alone. This should be expanded to include all learners, from early years through to colleges, universities, and lifelong learning, as connecting with nature is vital for learners of all ages and will be central to embedding sustainability across society.

It is also worth noting that while this paragraph focuses specifically on nature connection, the wider vision should also recognise the broader role of education in equipping people with the knowledge, skills and values to address climate change, biodiversity loss and pollution. This is an opportunity to broaden the understanding of, need for, and action required to enable 'nature connection' as part of a wider and more holistic approach to 'Learning for Sustainability' (LfS) as outlined in the Scottish Government's own [Target 2030 Action Plan](#) for all learners.

Question 2: Are there any outcomes that you feel should be removed, added or changed in the Environment Strategy?

We feel that several outcomes could be further enhanced:

Outcome 1 refers to 'restored' nature, but it is not clear to what baseline this restoration relates. Clarification is needed on whether this means restoring to pre-industrial, pre-intensive agriculture, or another agreed benchmark. The strategy also uses the terms 'restored' and 'regenerated' interchangeably, but these have different meanings and should be clearly defined.

Outcome 2 should be expanded to include the phrase 'and are going beyond net zero' to reflect Scotland's historical contribution to climate change. The current wording, 'ended Scotland's contribution to climate change', is snappy but misleading, as greenhouse gases emitted even in 2040 will continue contributing to climate change for decades (IPCC, 2023). The outcome would benefit from greater nuance, recognising both the ongoing legacy of past and present emissions and the wider ways in which our activities contribute to climate change beyond carbon alone. For example, continuing activity linked to deforestation in relation to agricultural practices does not always result directly in carbon emissions, but it actively reduces the ability of our environment to sequester and absorb greenhouse gases (FAO, 2020). A more accurate framing would acknowledge this complexity and highlight Scotland's responsibility not just to reach net zero, but to go beyond it by addressing land use, nature restoration and other drivers that affect the climate system.

Across all outcomes, the place of learning - in particular Learning for Sustainability (LfS) - needs to be strengthened to ensure people are supported to develop the knowledge, skills and values to contribute to achieving these outcomes.

Unfortunately, while this is embedded in various policies and frameworks across the 3-18 learning continuum, it is not mandatory across all sectors. This is despite practitioners and young people alike calling for a clearer steer to ensure LfS is embedded meaningfully and consistently. As one participant from our members workshop stated, "LfS isn't mandatory and it needs to be consistent," while another stressed the importance of "consider[ing] LfS from a holistic perspective as something that is for everyone, irrespective of sector, discipline, or level/stage". The strategy should therefore emphasise the role of qualifications agencies, policymakers and other key strategic bodies in embedding LfS consistently and meaningfully from across formal and non-formal learning. When integrated as a core part of the learner journey, this learning supports all outcomes of the strategy by developing cognitive, emotional, and behavioral skills, while also enhancing attainment (ScotGov, 2024). More explicit references to equality and poverty reduction, as covered by LfS, would also strengthen the outcomes, ensuring sustainability is not seen as solely environmental but as interconnected with social and economic justice.

Similarly, the draft outcomes currently risk 'siloing' education's contribution into either curriculum or biodiversity. In reality, good practice across education is a

whole-institution approach, embedding sustainability across governance, estates, curriculum, research and community partnerships. This should be more clearly reflected in the strategy as an essential way to achieve transformation for both institutions and their communities. The strategy could, for example, include commitments to:

- recognise sustainability leadership in governance structures (such as local authorities, boards and senior management)
- require consistent integration of sustainability across curriculum and qualifications frameworks
- highlight the role of estates and procurement in achieving net zero and circular economy goals
- and value the impact of community engagement projects as part of national delivery

Different institutions (urban/rural, large/small, research/teaching) also face different opportunities and barriers. For example, smaller or rural institutions may have limited access to funding, specialist expertise, or partnerships, while larger or research-intensive universities may have more capacity but face greater complexity in coordinating sustainability across multiple campuses and departments. The outcomes should allow for flexibility while still enabling like-for-like monitoring across the sector.

Furthermore, the potential of public estates, including the education estate and NHS estate, must be realised. These can act as exemplars of sustainable land management and net zero transition. For example, Scottish colleges and universities alone manage thousands of hectares of land, offering significant opportunities for sustainable land management, biodiversity restoration, and carbon sequestration. Existing schemes, such as SOS-UK's Green Impact programme, demonstrate how estates can be leveraged to deliver practical sustainability outcomes while engaging students and staff in hands-on projects. By acting as exemplars of net zero transition, public estates can showcase best practice, support behaviour change, and contribute directly to Scotland's environmental targets, thus underscoring the need for the outcomes to capture this role effectively.

Finally, the outcomes could be expanded to recognise the emotional and cultural dimension of connecting with nature (Mannion et al., 2025), which is currently missing from the draft strategy. Work such as the University of Derby's Five Pathways to Nature Connectedness demonstrates that fostering an emotional connection to the natural world, through contact, beauty, meaning, compassion and

emotion, is central to tackling the indirect drivers of biodiversity loss. These drivers are often overlooked, but they include the cultural norms, values and attitudes that shape how people view and treat the environment. Without addressing these, policy risks focusing only on technical fixes rather than lasting behaviour change.

Embedding this perspective in the strategy would mean recognising the role of arts, heritage, cultural expression and outdoor experiences in shaping people's relationship with the environment. For example, arts projects on campus, community festivals centred on sustainability, or outdoor learning can help people not only understand ecological issues but also feel the relevance to their lives. This sense of connection is what encourages long-term stewardship and motivates people to adopt more sustainable lifestyles (Climate Outreach, 2025). By explicitly acknowledging the emotional and cultural dimension, the strategy could help broaden the vision of transformation, ensuring that Scotland's response to the environmental emergency is not only technical and economic, but also deeply rooted in people's values, wellbeing and sense of place.

Outcome pathways

Question 3: There now follow questions about the individual outcome pathways. Do you think that the outcome pathways considered together include the important policies, actions and future priorities to achieve the Vision? If not, what changes would you suggest?

While the pathways bring together many important existing policies, they are incomplete. Crucially, there is no reference to the [Public Bodies Climate Change Duties \(PBCCD\)](#). These duties already provide a strong framework for reporting and accountability, and could be a powerful vehicle to help deliver the outcomes if integrated into the strategy. Public bodies such as local authorities, colleges, and universities have significant reach; both through their own operations and through their influence on learners, staff, supply chains and communities. Supporting them to deliver these duties is likely to accelerate progress, as well as decrease further reporting loads.

Similarly, the pathway for building Scotland's resilience to climate change should make explicit reference to the [National Adaptation Plan \(NAP\)](#). While the NAP is noted elsewhere in the draft strategy, it is not clearly connected to the resilience pathway itself. This risks creating a disconnect between high-level ambitions and the practical mechanisms already in place to deliver adaptation. The NAP sets out specific priorities such as managing flood risk, coastal erosion, heat stress and threats to health and infrastructure, with regular monitoring and reporting already in place. Linking the resilience pathway to the NAP would ensure coherence across

strategies and give education institutions, local authorities and other public bodies a clearer sense of how their own climate risk planning aligns with national priorities. For example, in some sectors such as universities and colleges, flood and overheating risks in their estates are already assessed; and aligning these assessments with the NAP would ensure their work contributes directly to Scotland's national resilience goals.

Outcomes on biodiversity, climate change and pollution

Question 4: The pathways for the outcomes on biodiversity, climate change and pollution signpost to existing policies – how can we best address potential synergies and trade-offs across these outcomes? For example, how can we reduce greenhouse gas emissions in a way that also helps to restore biodiversity and minimise pollution?

The current framing underplays the severity of Scotland's biodiversity crisis. While globally it is described as an emergency, in Scotland the situation is more equal to a catastrophe, as shown in the [Biodiversity Intactness Index \(BII\)](#). Scotland's position in the bottom 12% of nations for biodiversity intactness must be explicitly stated, as shown by [SPICE](#), rather than the less precise 'bottom 25%' currently used. Accurately framing this will help set the urgency for action and ensure synergies with climate and pollution outcomes are pursued at pace.

The pathways should also reference the [Public Bodies Climate Change Duties \(PBCCD\)](#); with a commitment from Scottish Government to support delivery of these duties. This could include clearer alignment of PBCCD reporting with the Strategy's outcomes, guidance for public bodies on embedding sustainability across core functions, and stronger accountability mechanisms to ensure leadership follow-through. As trusted organisations with immense reach, both in terms of staff employed and service users, public bodies can directly support Scotland's net zero and other sustainability-related targets by reducing their own emissions and effecting nature-friendly practices, whilst simultaneously facilitating education, behaviour change and supply chain buy-in. Recognising this would strengthen the synergy between biodiversity, climate and pollution outcomes. Specific examples include the procurement of services such as transportation, catering and vending, campus maintenance and energy; and consumables such as software and educational materials, in learning settings. Adopting a circular economy approach to all procurement; particularly with regard to disposal practices, is also key.

Finally, the strategy makes reference to the role of education in changing behaviour, which is commendable. However, a lack of time and capacity has been cited as the main barrier to embedding LfS in across all recent reports on sustainability in further and higher education known to us ([EAUC, 2024](#); [ETF, 2021](#)), and the same has been reported anecdotally in other educational sectors. Any strategy and pathway must acknowledge this and ensure that adequate funding and capacity building among educators allows for visions to become reality. Policy and strategy must be accompanied by support for practice to be effective. The Strategy should also demonstrate greater urgency and set out clear, practical steps, possibly supported by a high-level summary brief for time-pressured educational practitioners. Outcomes should not only articulate ambition but also map clear routes to delivery that are accessible and realistic for institutions already under significant financial and staffing pressures.

Scotland's global environmental impact is sustainable

Question 5: What are the top priorities the Scottish Government should focus on to improve the environmental impact of Scotland's activities on other countries? – For example, this could include the impacts of producing the goods and services we import into Scotland, our exports of waste and our approach to international engagement.

We agree with the strategy's focus on food, textiles and transition minerals such as those used in digital software/hardware, batteries and solar PV. These are high-impact sectors where Scotland's imports and consumption patterns significantly affect other countries ([Scottish Government, 2025](#)). Prioritising these areas will therefore help reduce Scotland's global ecological footprint.

We also suggest that Scotland could show leadership by ensuring its public procurement policies are aligned with Fair Trade principles and certified sustainability standards, setting a clear example for supply chain responsibility. This would also ensure clearer alignment with the PBCCD reporting requirements.

Again, the role of education here is pivotal in terms of enabling educators and learners of all ages to understand the impact of their choices – socially, economically, culturally and ecologically – on the wider world around them and to take action to remedy this.

Question 6: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome “Scotland’s global environmental impact is sustainable”?

Yes. Learning for Sustainability (LfS); which includes the key concept of global citizenship, is an entitlement of all learners and the responsibility of all teachers across Scotland. Through this, and legal duties such as the UN Convention on the Rights of the Child, Scottish learners aged 3-18 are encouraged to ‘act local, think global’: an ethos that is supported by engaging with other learners across the world to exchange knowledge, skills and perspectives. As outlined in the [One Planet Schools report in 2012](#), which paved the way for the current national LfS Action Plan: ‘Our vision is of a flourishing Scotland where sustainable and socially-just practices are the norm throughout society and our roles and responsibilities within a globally-interdependent world are recognised. This is a Scotland where learners are educated through their landscape and understand their environment, culture and heritage; where they develop a sense of place and belonging to their local, national and global community, and have a deep connection to the natural world. Here, learners will understand the significance of their choices, now and in the future.’

Supporting and enabling this kind of learning, through sustained funding for learners of all ages to collaborate with other learners on a global scale, is essential if Scotland is to achieve, and sustain, this outcome.

The draft pathway (section 3.4.5) should also more explicitly recognise the role of Scottish universities in international research collaboration. Universities are already contributing to sustainable trade and climate justice through global partnerships, and this could be leveraged further to support the outcome of making Scotland’s global environmental impact sustainable.

For example, various Scottish universities are working with partners in the Global South on projects ranging from [sustainable agriculture](#) to [renewable energy transitions](#), helping reduce emissions and support resilience in regions disproportionately affected by climate change. These collaborations not only generate new knowledge, but also build capacity in partner countries and promote equitable approaches to sustainable development.

In addition, universities play a critical role in developing international frameworks and standards, such as through climate science research that underpins IPCC reports, or through innovations in fair supply chains and circular economy practices. Their reach also extends into international education, where students from around the world come to Scotland and, when sustainability is embedded meaningfully, return home with sustainability knowledge and skills that have global ‘ripple’ effects.

While universities need more incentives and support to further embed sustainability in research and teaching, there are already excellent pockets of good practice at all Scottish institutions that would benefit from recognition and support.

Explicitly recognising the role of international research and education partnerships in the strategy would highlight how Scotland can act as a responsible global citizen, reducing its ecological footprint while also contributing solutions to global challenges. By embedding this in the pathway, the strategy would send a clear message that Scotland's leadership on sustainability is not limited to domestic action but is also delivered through collaboration and knowledge exchange worldwide; across all sectors of education.

Scotland's society is transformed for the better by living sustainably, in harmony with nature

Question 7: To what extent do you agree/disagree that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises?

If you agree, please explain in the text box below how you think the Scottish Government could most effectively support and enable these changes in ways that also help to improve people's lives and tackle inequalities.

Or, if you disagree, please explain in the text box below why you don't think that societal changes, including in our lifestyles and behaviours, are needed to help tackle the nature, climate and pollution crises.

Strongly agree.

Tackling the climate, biodiversity and pollution crises cannot be achieved without significant societal changes in how we live, travel, eat, and consume; and in the way we relate to both the human and the more-than-human world. Education and public bodies are central to enabling these shifts, something which the strategy must emphasise more strongly.

For example, in early learning and schools, Learning for Sustainability (LfS), which brings together the key concepts of global citizenship, education for sustainable development, and the pedagogy of outdoor learning, is already an entitlement of all learners and the responsibility of all teachers across Scotland. It is important to understand that LfS is an ethos for life and learning that permeates and is woven through all aspects of the 'totality of experience' in an educational setting; learning

for sustainability through the development of the skills, knowledge and values needed to understand and take action on sustainability-related matters, rather than simply learning *about* sustainability. As of 2023, the national [LfS Action Plan](#) tasks every learning setting for pupils aged 3-18 to become a Sustainable Learning Setting through the four areas of Culture, Curriculum, Campus, and Community.

Key educational bodies such as the General Teaching Council for Scotland, Scottish Qualifications Authority (soon to be Qualifications Scotland), Convention of Scottish Local Authorities, Education Scotland, and Scottish Credit and Qualifications Framework (amongst others) all have specific targets and actions within the Plan. This is an ideal opportunity for joined-up policy-making across Scottish Government to further support this ambition through the various estates and procurement policies outlined for public bodies such as local authorities; as well as ensuring that LfS is woven across the current Curriculum Improvement Cycle to ensure that it remains a pan-thematic, pan-sectoral, holistic, interdisciplinary and cross-curricular element of learning.

Further support for educators to identify existing and other opportunities for weaving LfS across their practice and the wider life of their settings and the communities around them is also crucial: ensuring alignment with other key strategies and legal requirements such as the [National Improvement Framework](#), [UN Convention on the Rights of the Child](#), [Getting It Right For Every Child](#), [Developing the Young Workforce](#), and [How Good Is Our School 4](#) (and its successor).

Within post-16, further and higher education institutions are already leaders in community engagement, from local gardening projects to intergenerational work with children and older people. Even where degrees are not directly sustainability-related, students often learn from and contribute to local communities. This reciprocity is a powerful enabler of sustainable lifestyles and should be recognised as well as further supported and incentivised. Non-formal activities, such as open learning platforms offering sustainability modules, also extend education's reach. A mechanism for sharing and strengthening such initiatives across the education sector would strengthen the pathway.

The Scottish Government could most effectively support and enhance these societal changes by:

- Accelerating qualification reviews and benchmarking statements to embed Learning for Sustainability into curricula at all levels, as well as ensuring practitioners are equipped to put requirements into practice by providing adequate training/professional development and resources. SQA has already begun this process through its [Next Generation Higher National \(Next Gen](#)

HN) programme for colleges; embedding sustainability into qualification design and delivery.

- Expanding, enhancing and supporting outdoor learning opportunities beyond schools/early learning settings to include colleges, universities, and communities; ideally with an intergenerational ethos.
- Developing a Scottish public bodies supply chain roadmap to net zero, similar to what has been done by [NHS England](#) and [Zero Waste Scotland](#). There are discussions already taking place in the college and university sector for this, and interest has been expressed across the Scottish public sector.
- Extending and encouraging take-up of sustainable catering frameworks – and accompanying educational activities for catering staff and the consumers they serve - across all public sector provision; for example through [Food for Life](#) standards.
- Reviewing how colleges and universities are embedding sustainability within learning, teaching and research (as expected under the [Climate Change \(Scotland\) Act 2009](#)) and supporting expansion of effective practice. This is especially as the PBCCD requires sustainability to be embedded within all core functions, including learning, teaching and research.
- Improving building and planning standards to embed net zero technologies and adaptation measures by default in new builds and retrofits; and capitalising on the learning opportunities that this approach can offer those who utilise these buildings.

Question 8: Do you have any further views on how the pathway outlined in the draft Strategy can help achieve the outcome “Scotland’s society is transformed for the better by living sustainably, in harmony with nature”?

The strategy should emphasise lifelong learning; recognising that Learning for Sustainability is not confined to schools or formal qualifications. Embedding this consistently across the learner journey, from early years onwards, requires stronger accountability mechanisms for policymakers and education leaders, alongside monitoring and evaluation. Where the integration of LfS remains a ‘nice thing to do’, rather than a priority that is backed by resources and support, it will continue to be outranked by other seemingly ‘more pressing’ priorities and issues.

All education sector organisations should also act as role models, embedding sustainability within their own organisational learning journeys. Mass professional learning for educators, co-designed and co-created with and by educators themselves, is urgently needed to raise confidence in delivering Learning for Sustainability; including in community learning settings.

We welcome the recognition of the arts in supporting cultural change. Arts-based initiatives, such as those by [Culture for Climate Scotland](#), can inspire and engage people in ways traditional policy cannot.

In order to further promote these benefits, we recommend enabling public bodies and education institutions to host and facilitate such projects, embedding them in everyday community spaces with high-footfall such as hospitals, GP practices, universities, colleges, shopping centres and high streets.

Scotland's net zero, nature positive and circular economy thrives within the planet's sustainable limits

Question 9: To what extent do you agree/disagree that a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises?

If you agree, please explain in the text box below how you think the Scottish Government could most effectively support this transition in ways that create wider economic opportunities for Scotland, including for jobs and businesses.

Or, if you disagree, please explain in the text box below why you don't think a just transition to a net zero, nature positive, circular economy is needed to support Scotland's role in tackling the nature, climate and pollution crises.

Strongly agree. A just transition is essential to ensure fairness while tackling the nature, climate and pollution crises.

Scottish Government can best support this transition by:

- Investing in all education sectors to equip learners with 'green' skills, such as through its mention in the national '[Developing the Young Workforce](#)' policy for schools, while enabling diverse learners and local businesses to participate in study programmes. For example, [Dumfries and Galloway College's Net Zero Skills Centre](#) is having significant impact equipping students with green skills, retraining regional businesses, and supporting them further with emissions reporting and reduction plans. Opportunities like this should be available across Scotland: supporting learners and educators alike to understand the need for an interconnected approach to ecological, social, cultural, and economic sustainability and enabling them to develop the skills, knowledge,

values and confidence to take action on this in a way that is appropriate and meaningful for their particular context and communities.

- Increasing scrutiny and accountability of public bodies on Climate Change Duties reporting is essential, as current submissions vary in quality and risk becoming a tick-box exercise. Stronger oversight would ensure that sustainability is embedded as standard across learning, teaching, research, estates and supply chain activities. It would also make senior leaders more accountable for delivery, linking sustainability responsibilities directly to governance and decision-making. Greater scrutiny could help surface good practice while also enabling greater visibility, sector-wide improvement and knowledge sharing through further support for organisations such as the Sustainable Scotland Network ([SSN](#)). Without this, ambitious targets risk remaining disconnected from action and institutional leadership.
- Continuing/increasing support for small and medium-sized enterprises (SMEs) regarding improvements such as energy efficiency (e.g. [SME Loan Scheme](#)). This should include helping SMEs develop sustainability plans, targets and emissions reporting, as well as providing resources on climate risk, adaptation and biodiversity – as well as wider educational opportunities to embed a 'Learning for Sustainability' ethos in their operations in order to better understand the interconnected nature of the challenges faced. Since public bodies increasingly embed sustainability within procurement, tailored support is also needed to ensure SMEs can remain competitive in tenders by investing in sustainability-related measures and providing the granular data required for sustainability scoring.

We build Scotland's resilience to climate change and other global environmental risks

Question 11: Do you agree/disagree with the approach set out in the pathway for the outcome "We build Scotland's resilience to climate change and other global environmental risks"?

We agree with the general approach, but believe it should be more strongly connected to education and public awareness. Some institutions are already doing great work in future-proofing campuses against the effects of climate change, something which should be recognised in the strategy. For example, many local authorities and universities are incorporating climate risk assessments into their estates planning, ensuring that new buildings are designed to cope with flooding,

overheating, and energy shocks. Colleges are piloting low-carbon heating systems, such as [district energy networks](#), and [retrofitting older buildings](#) to make them more resilient while also reducing emissions. These practical steps not only protect infrastructure but also act as visible examples for students and communities, showing what resilience looks like in practice.

However, building resilience is also about equipping citizens with the knowledge and skills to adapt and thrive. The strategy should therefore commit to embedding climate resilience education across all levels of learning, from early years through to lifelong learning, supported by professional development for educators. Education institutions, from early learning onwards should be explicitly recognised as key actors in resilience-building.

For example, schools are increasingly helping pupils understand and respond to global risks through Scotland's national commitment to Learning for Sustainability; highlighting (amongst others) the links between climate change, nature, and social justice. Outdoor learning, climate action projects, and pupil-led initiatives give students opportunities to influence their school environment while developing their understanding of their role as global citizens in an interconnected world.

The post-16 education sector is also contributing to resilience building through specialised skills training and applied research. Colleges are providing courses on renewable energy, sustainable construction, and land management that directly prepare learners to support resilience in their communities. Universities contribute through research on climate risk and adaptation planning, from flood management to public health impacts, and also by embedding resilience themes into degree programmes across disciplines. In both settings, there is ongoing work to ensure learners are equipped not only with technical skills but also with the values and problem-solving approaches needed to thrive in a changing climate.

However, these approaches are not yet the norm across all learning in Scotland, and all education sectors urgently need more consistent government support for professional development and curriculum integration. Educators across all sectors require training and resources to confidently facilitate learning about sustainability-related issues such as resilience, climate risk, and climate justice. The strategy could also encourage greater collaboration between education institutions and local communities, so that knowledge and best practice are shared more widely. Finally, embedding resilience more explicitly into qualifications frameworks would ensure that all learners, regardless of subject or pathway, leave education with the ability to understand and respond to climate risks.

These transformations are achieved through a just transition and support climate and environmental justice

Question 12: Do you agree/disagree with the approach set out in the pathway for the outcome “These transformations are achieved through a just transition and support climate and environmental justice”?

We agree that the pathway supports climate and environmental justice. However, more could be done to ensure learners and educators across all educational sectors are equipped with the knowledge, skills and values needed to contribute to a just and sustainable Scotland. This should include embedding sustainability within all qualifications and expanding opportunities for learners to engage directly in sustainability-related action.

In order to do this and achieve a just transition, educators themselves need support to build confidence and capacity ([ETF, 2020](#)). Without investment in professional learning, many educators will lack the tools to deliver on the ambitions of Learning for Sustainability - and this Strategy. The need for more support for and investment in professional learning should be explicitly addressed; ensuring that learners in all settings, including community education, have equal access to high-quality sustainability-related training and education.

We would also suggest that the strategy explicitly references the need to reduce inequalities across gender, race, disability, and socio-economic status in access to education opportunities and sustainability-related employment. Without more support and prioritisation to embed approaches that help to reduce inequalities, a just transition risks leaving behind the very groups it aims to support.

Questions on the Impact Assessments

Question 15: Are there any positive or negative impacts on protected groups (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation) that have not been identified in the draft Equalities Impact Assessment?

In the impact assessment, sexual orientation and gender reassignment are left blank. It should be recognised that people within the LGBTQ+ community can be at elevated risk to climate change than other groups. For example, akt's 2025 report '[there's no place like home](#)' found that:

- LGBTQ+ people are twice as likely to experience hidden homelessness (e.g. sofa surfing, squatting) as non-LGBTQ+ peers. LGBTQ+ people from racialised minorities face 50% higher risk. Trans young people were found to be particularly vulnerable, with 37% expected to experience homelessness compared to 22% of those who had not changed their gender (statistically significant at the 1% level).
- Of those surveyed, 1 in 4 LGB+ people had experienced homelessness, compared to official government figure of 4%. Government data underestimates LGBTQ+ homelessness, failing to capture its breadth and complexity.

Social stigma, racism, reduced access to goods and services through discrimination or reduced economic means all contribute to increasing the risk and vulnerability of individuals and communities to climate change.

Question 19: Are there any positive or negative impacts from the draft Environment Strategy that have not been identified in the draft Child Rights and Wellbeing Impact Assessment?

We welcome the inclusion of the [UN Convention on the Rights of the Child](#) in the draft Strategy. In particular, Article 29 is highly relevant, as it highlights the role of education in developing respect for the natural environment. Embedding this principle more explicitly within the Strategy would strengthen its alignment with children's rights and wellbeing, ensuring that Learning for Sustainability is recognised as a right for all young people, not just an optional enrichment activity.