

NHS Grampian's Climate Emergency & Sustainability Strategy: Reimagining the Health Service for People & Planet 2023- 2028



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Glossary

Biodiversity

Variety of plant and animal life in an area of particular habitat.

Green Space

An area partly or completely covered with trees, shrubs, grass or other vegetation.

Blue Space

An area partly or completely covered with bodies of water or near bodies of water.

Anchor Organisation

A large influential organisation which can help address local social, economic and environmental priorities in order to reduce health inequalities

2.0 Preface

This strategy is the culmination of a significant effort in bringing together the numerous projects that NHS Grampian has been doing to improve its sustainability of services, what it is required to do by Government, its moral obligations to the people of Grampian and the contribution it makes globally. It aligns its intentions for sustainability improvement with its own overarching strategy for delivering services and population health, the “Plan for the Future”.

An organisation as big and complex as NHS Grampian has statutory duties and obligations across many facets of its services. These include, but are not limited to, heat and power, transport, procurement, waste, clinical issues, greenspace and biodiversity. Importantly this strategy acknowledges the work already in place by partners in public services, third sector and commercial providers, and aims to build on this – addressing the climate emergency and sustainability depends on whole system collaboration.

The aims of the strategy are ambitious and they should be. Grampian Health Board intends to play its part fully in helping the nation meet its climate obligations. Implementing the strategy requires having the appropriate resources to do so. The forthcoming Delivery Plan will address this, looking in detail at the actions planned to achieve our ambitions including quantification of impact, timescales and priorities. Meantime much work is already underway with new projects at an advanced stage.

Achieving our aims means commitment and conscious effort is needed from staff at all levels of the organisation and across the health system. Development of the strategy has included significant engagement with staff and partners who have shown considerable enthusiasm for our sustainability aims and improvements. This has very much been a two way discussion and already we have seen more people stepping forward to become sustainability ‘champions’, turning ideas into actions at local level - providing benefits for health, environment and economy.

Derick Murray, NHS Grampian Non-Executive Director and Sustainability Champion

3.0 Introduction

NHS Grampian's Climate Emergency and Sustainability Strategy: A Reimagining of the Health Service for People and Planet strategy aims to develop climate change adaptation, environmental sustainability, and biodiversity action locally through NHS Grampian's Plan for the Future, as well as aligning with the national targets set out in NHS Scotland's Climate Emergency & Sustainability Strategy & Policy for NHS Scotland on the Global Climate Emergency and Sustainable Development. This ultimately allows our organisation to contribute to the targets laid out in the United Nations' Sustainable Development Goals (UN SDGs).

The climate emergency is a global issue with health, workplace, and community impacts. The causes of health inequalities and poorer health are intrinsically linked to the climate emergency. If we are to continue to provide the healthcare our communities require, our approach to healthcare delivery will benefit from a shift away from hospital-based care to preventative primary based care in the community.

As part of developing our approach to sustainability and the climate emergency, we will listen and learn from our partner organisations, sustainability groups, public health, communities and staff partnership. We will adopt good practise across the system, structuring our approach, working collaboratively, leading by example, and educating. This will set the scene for NHS Grampian, supporting its aim of being an anchor organisation in the North East of Scotland.

3.1 Background

Climate change is the change in our global climate pattern, particularly in relation to increased levels of carbon dioxide (CO₂) produced through using fossil fuels and other greenhouse gases. This has led to the greenhouse effect, which causes warming of our planet by trapping heat within our lower atmosphere. This change to the planet's mean global temperature is now categorised as a Climate Emergency, due to the locked-in impacts on society due to climate change.

These will not only impact NHS Grampian's activities and how we deliver healthcare, but also on what we are required to treat:

- increased temperature, changing disease patterns (e.g. Lyme Disease, Malaria);
- increased sea levels leading to disruption to coastal communities;
- pollution from burning fossil fuels increasing respiratory diseases; and
- changes in rainfall patterns leading to flooding and the potential to directly impact people's health and wellbeing overall.

Human activities have brought about an international emergency that requires urgent action to reduce our impact through seeking out a socially sustainable future for our society. It is forecast the planet will continue to warm beyond 1.5 °C by 2040; our activities require adjustment now if we are to realise our goals of limiting the effects of global warming beyond this.

3.2 **Scottish Government & NHS Scotland**

In 2022, the Scottish Government and NHS Assure published the [NHS Scotland Climate Emergency and Sustainability Strategy: 2022-2026](#). This ambitious strategy sets out the plans for NHS Scotland to reduce its greenhouse gas emissions and impact on the environment, adapting to climate change and to better contributing to the UN SDGs.

The strategy covers five main themes, each with associated actions and targets to support overall net-zero ambition:

1. **Sustainable Buildings & Land** – focusing on the actions that will be taken to help create sustainable NHS buildings and look at sustainable land use;
2. **Sustainable Travel** – looking at reducing the need for travel and promoting active travel, public/community transport, decarbonising our fleet and delivery of care during periods of transport and infrastructure disruption due to climate change;
3. **Sustainable Goods & Services** – reducing our demand for resources and avoiding accumulating waste by establishing a circular economy;
4. **Sustainable Care** – the way in which we provide care will have a major impact on both our communities and the environment – it is key in our transition into a net-zero service; and
5. **Sustainable Communities** – supporting the health and wellbeing of our communities, building community resilience and maintaining engagement within communities are key in our role as an anchor organisation.

All health boards in Scotland are working on aligning with the goals and actions that have been set out in this document.

3.3 **NHS Grampian’s Plan for the Future**

The Plan for the Future is NHS Grampian’s strategy for 2022-2028, with the aim of providing sustainable health and care to the population, focussing on three major elements: People, Places & Pathways.

NHS Grampian has set itself the challenge to be a leader in sustainability and reducing our impact on the environment. Human health and planetary health are inextricably linked and making use of the extensive human, environmental

and social assets of Grampian towards our sustainability goals is the primary aim.

We have a statutory requirement to deliver a net-zero carbon service across our infrastructure, requiring emphasis not just on buildings but on the way we contribute towards a circular economy – reducing, reusing, and recycling. Our travel policies, healthcare practices, use of buildings and supporting change in communities are all part of a bigger shift towards sustainability.



3.4 Reimagining the Health Service for People, Places & Pathways

Our organisation has a responsibility for the environmental stewardship of its extensive estate and facilities, and to achieve the scale of change required we need commitment at a whole-system level. Tackling climate change also presents an opportunity to improve the health and wellbeing of our communities, to avoid health harms and to reduce health inequalities

The Strategic Framework of this strategy focuses on four main themes:

- (1) Delivery of Net-Zero
- (2) Greening Health Systems;
- (3) Greening Places & Communities; and
- (4) Collaboration across local and national systems.

As part of this strategy, NHS Grampian has defined a set of system-level outcomes that will show that NHS Grampian has re-imagined our health service for people, place, and planet.

Annual and medium-term (3 year) NHS Grampian Climate Emergency and Sustainability Delivery Plans have and continue to be developed to describe the specific operational actions and measurable outcomes that will evidence progress.

For all outcomes, NHS Grampian will align to its statutory obligations in relation to climate change and environmental sustainability. In addition, the organisation also recognises the need for more local, targeted outcomes that go beyond its statutory responsibilities.

4.0 Delivery of Net-Zero for NHS Grampian

The healthcare sector is currently a significant emitter of greenhouse gases, globally it is responsible for almost 5% of global greenhouse gas emissions (Smith, 2022).

As outlined in Figure 1, NHS Scotland is directly responsible for emitting greenhouse gases through its healthcare service activities (referred to as Scope 1 emissions), it is also responsible for greenhouse gas emissions associated with its energy procurement (Scope 2) and its procurement of goods, services, and staff travel (Scope 3). There are also the indirect emissions from patient travel which are associated with organisational activities which are currently outwith our direct control.

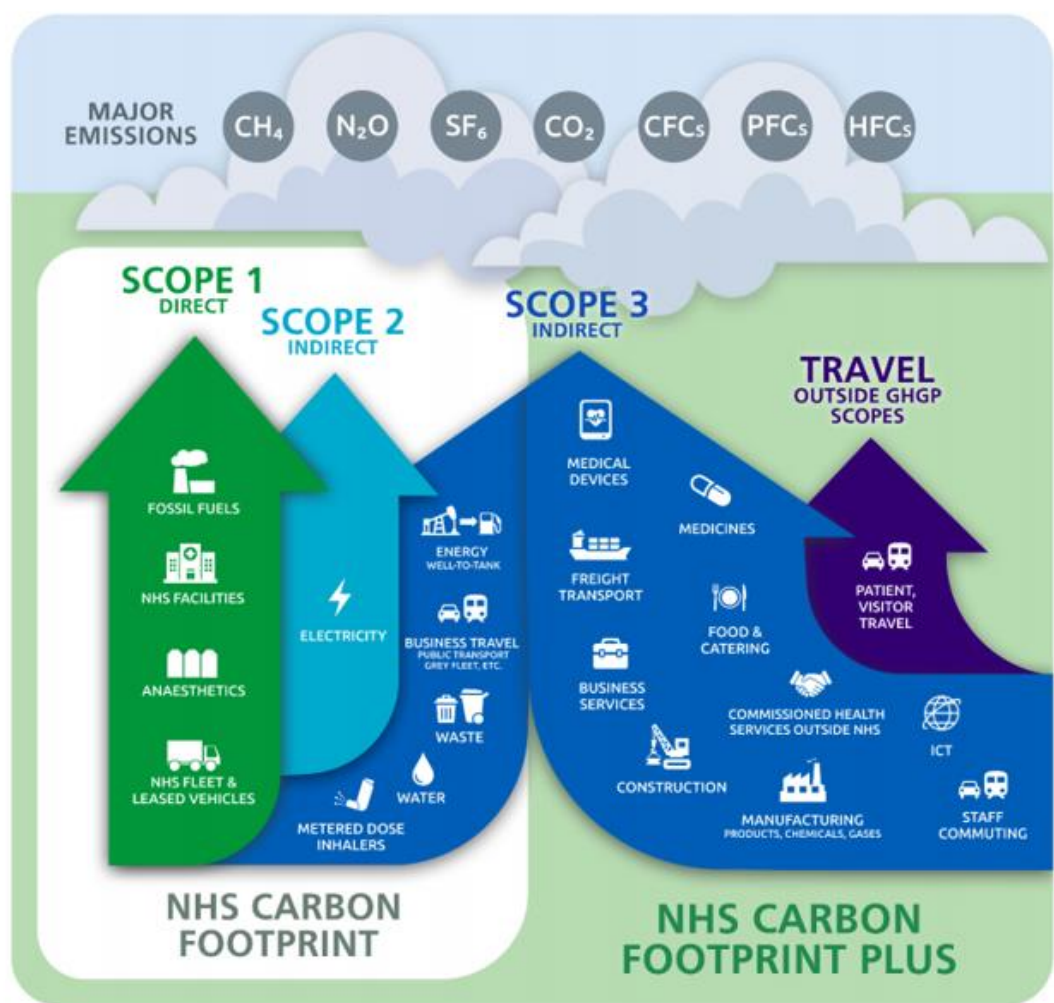


Figure 1: NHS Scotland's major emissions and sources of emissions from NHS Grampian Net Zero Routemap Report 2023 (Grampian, 2023)

The relative contribution to greenhouse gas emissions from our direct, indirect, and associated activities are shown in Figure 2.

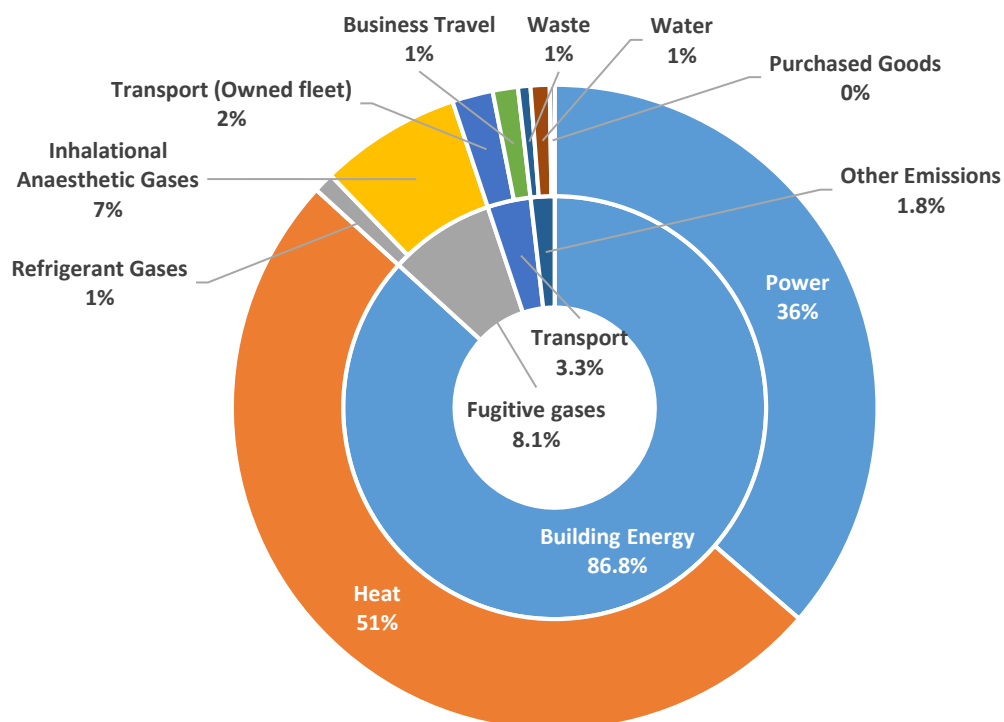


Figure 2: A breakdown of carbon emissions from all NHS Grampian activities as detailed in the NHS Grampian Net Zero Pathway Routemap Report 2023. Emissions from medicines, medical equipment and supply chain are emissions that are outwith the control of the NHS itself, however it makes up 66% of the NHS's total carbon footprint.

4.1 NHS Grampian Net Zero Routemap

The NHS Grampian Net Zero Routemap outlines a coordinated and consistent delivery of NHS Scotland's obligations under The Climate Change (Emission Reduction Targets) (Scotland) Act 2019.

The Routemap sets out the most economically viable cost modelled pathway for NHS Grampian Health Board (NHS Grampian) to achieve Net Zero operational emissions target by 2040, utilising both established and emergent energy technologies.

4.2 Building Energy- Heat & Power Strategy

An NHS Grampian Heat and Power Strategy is being finalised with reference to NHS Grampian's commitments and the national targets for net zero heating (2038) and power (2040).

The Heat and Power Strategy recognises to achieve Net Zero NHS Grampian needs to review how the organisations buildings are currently used, looking at gas and electricity consumption

4.3 Transport - Electric Vehicle Transition

The transition of NHS Grampian’s vehicle fleet away from fossil fuel reliance is based on its commitment to the Scottish Governments national targets set out in [DL \(2021\) 38](#).

NHS Grampian recognises the organisation needs to review the logistical challenges across its estate in order to achieve a sustainable and operational fleet.

4.4 Sustainable and Educated Workforce

To achieve net-zero, NHS Grampian must look beyond the infrastructure of our organisation and the traditional aspect of “hard” facilities management. This includes the culture of work undertaken within our organisation.

Sustainability needs to be embedded into our organisation, playing a central role in our strategic plans and embedded within our medium to-long-term financial planning. Our staff should feel empowered, educated and supported to create a culture of stewardship and responsibility for their environment.

4.5 Reporting of Emissions

Alongside statutory reporting duties, to achieve and sustain net-zero in line with the policy targets, NHS Grampian will regularly report on its carbon emissions (Scope 1-3) and develop a more comprehensive carbon reporting regime.

4.6 Our Outcomes for Delivering a Net-Zero NHS Grampian

NHS Grampian will:

1. Be compliant with its statutory duties as a public sector body regarding Scottish climate change, environmental sustainability, and biodiversity legislation. It will ensure all statutory reporting is published as part of its Scheme of Publication;
2. Embed the need to address the climate emergency and environmental sustainability within its organisational policy and decision-making processes and promote a culture that prioritises action to go beyond meeting its statutory duties;
3. Deliver the net zero requirements set out in the NHS Scotland Climate Emergency and Sustainability Strategy: 2022-2026, and its associated policy;
4. Deliver the essential, organisational infrastructure to achieve net zero emissions within both Scope 1 and Scope 2 activities and develop mechanisms that address the Scope 3 emissions to which its activities as an NHS Board contributes;
5. Actively engage with and develop its employees, whether directly or indirectly regarding the transition to net-zero NHS Grampian and the essential contributions they will make towards attainment.

5.0 Greening Health Systems

At the heart of this strategy is the way we provide healthcare; transforming how we plan and deliver services to make our model of care more sustainable. This is where we can deliver significant impact with long-lasting change. The most sustainable model of care (both financially and environmentally) is one in which fewer people need any care at all.

NHS Grampian, like any healthcare system, faces an inherent challenge: providing healthcare to patients contributes to climate change in a way that increases the risk of harm to both the environment and human health. The climate emergency and environmental degradation has the effect of potentiating the impacts of social, economic, and environmental determinants of human health. This results in increasing the inequalities which give rise to poor health and leads to additional demands on the healthcare system in future years.

There are opportunities to create more environmentally and financially sustainable healthcare systems if we plan for and implement adapted models. For example, taking action to reduce the inequalities that determine poor health will help create a healthier, more resilient population. This in turn will lead to a reduced demand for health and care services that consume environmental resources and release greenhouse gases.

Switching the balance between preventative interventions and healthcare services will also provide opportunities to reduce the need for future health care services.

All aspects of how health and health care is delivered has the potential to be supporting adaptation to the consequences of climate change and reducing environmental degradation. This is true whether we are seeking to ensure equity in health; refining the balance between primary care, community or hospital-based care; or building effective care pathways or packages and enabling communities to be involved in service design to ensure they meet local needs.

The NHS Scotland Climate Emergency and Sustainability Strategy has set out a number of immediate areas for action which will be the basis for NHS Grampian's approach to greening our health systems.

These areas are set out in Figure 3. Whilst all of these are important in themselves, NHS Grampian is committed to work to develop its health care systems in a manner that puts sustainability at the heart of how we deliver care.

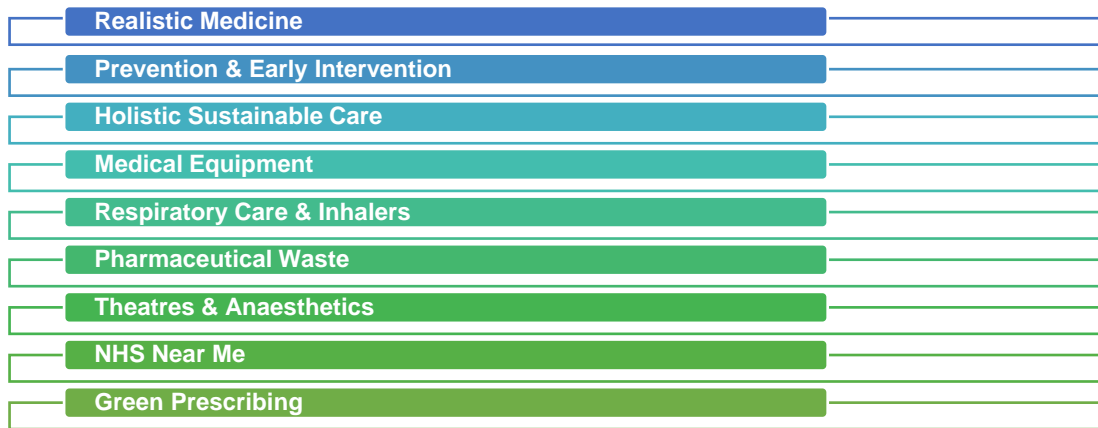


Figure 3: Sustainable Care Models

5.1 Realistic Medicine

Realistic medicine gives people the information about their healthcare and treatment to support more questions and their decision-making about what is best for them. In doing so NHS Grampian will take a personalised approach to care, in turn reducing harm and waste, whilst improving outcomes. Central to the approach is how we deliver care with an emphasis on caring, rather than a systems and processes approach.

5.2 Green Theatres

Theatres and anaesthetics are carbon, energy, and waste-intensive areas within the organisation. This is further compounded by the increasing consumption of single use items and a reduction of reusable surgical instruments, which have smaller environmental impact over their useable lifetime.

5.3 Green Prescribing

Green Health Prescriptions was launched by the Scottish Government in April 2019. Green prescribing includes nature-based activities such as health walks and volunteering in community gardens. It also enables clinicians to develop and advocate both human and environmental health.

5.4 Waste & Circular Economy

Greening our healthcare system goes beyond sustainable care models. In both clinical and non-clinical settings, reducing waste in our healthcare pathways is key if we are to see a reduction in our impact on the environment.

To reduce the impact of waste we must segregate waste at the point of use correctly.

NHS Grampian will align with national targets, create local targets and provide support to teams to materialise a reduction in the amount of waste we produce. Reviewing our procurement process will be a part of this as we select suppliers and products with higher sustainability ratings, whilst also promoting the principles of the circular economy (see Figure 4).

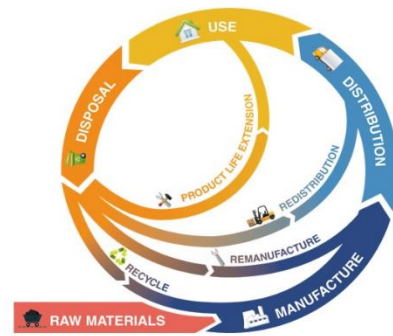


Figure 4: Principles of circular economy

5.5 Sustainable Procurement

NHS Grampian currently spends more than £200,000,000 per annum with trade suppliers for products, and services, locally, regionally and nationally. We manage our procurement activities to ensure safe, efficient, and effective operations, supporting NHS Grampian in achieving its objectives.

NHS Grampian's procurement will support the development and involvement of communities, SMEs, third sector organisations and supported business.

NHS Grampian makes indirect contributions to emitting greenhouse gases through the goods and services that it purchases to be able to provide health and care services. If we seek to source more goods and services locally, we can help to reduce the level of greenhouse gases which are produced across the supply chain: especially through transport. Where we buy locally, we can also use our influence to encourage our suppliers to be more aware of the climate emergency, the need for environmental sustainability and help them to adapt to climate change and protect environmental resources.

5.6 Our Outcomes for Delivering Greener Health Systems

NHS Grampian will

1. Further develop its approach to prevention and proactive care to promote and maintain more sustainable approaches to wellbeing, health and care;
2. Redevelop its health and care systems to be more climate-change ready and environmentally sustainable, placing an initial focus on those aspects already active across Scotland contributing towards net zero in realistic health and realistic care;
3. Build on its approaches to innovation and quality improvement to identify more sustainable approaches to practice and apply these across NHS Grampian; and
4. Create a 'Culture of Stewardship,' building on net zero staff development to enhance the advocacy role of health care clinicians in human and planetary health and empowering them to take action to promote more sustainable services.

6.0 Greening Places & Communities

Both People and Places are a key priority area under the Plan for the Future strategy. As an organisation, NHS Grampian has a commitment to be a mindful and deliberate partner, working with others to achieve sustainable change for our communities.

Our places provides the settings for the work for our staff and are an invaluable resource for the patients and communities we serve. NHS Grampian has a responsibility to our staff, patients, and communities to provide healthy, quality spaces including the green spaces across our estate.

Access to natural outdoor areas stimulates physical and mental well-being (Marcia P. Jimenez, 2021). Green spaces also provide us with better air quality, reduced heat island effects and biodiversity (Centre, 2023). Ultimately, these spaces play a critical role in the health of our communities and the natural environment.

6.1 Climate Change Adaption

Green spaces across NHS Grampian's estate have been historically under-used and potentially undervalued, however they offer enormous opportunities in our approach to climate-change resilience. NHS Grampian will explore options for climate-change adaptation, particularly nature-based solutions, to protect our places for our staff and patients.

6.2 Increase Biodiversity across the NHS Grampian Estate

Green spaces are important refuges for wildlife. Like the rest of the UK, biodiversity is relatively poor across Grampian. However, the functions that biodiversity provides are vital to environmental health and regulation. Ecological processes help to keep pests in check, purify the air and water we use, sequester carbon, cool the climate, pollinate our crops, and more. NHS Grampian will explore options on its sites to increase biodiversity.

6.3 Increase Community Access to Green Spaces

Encouraging public, patient and staff use of our green spaces will provide health benefits and provide opportunities for broader engagement, including volunteer networks. Engagement through our green spaces can also grow enthusiasm for the natural environment, while fostering stronger connections and a sense of belonging in our region.

6.4 The Place Standard Tool

The Place Standard tool has been used for some time by local authorities. It allows communities, public agencies, voluntary groups and others to identify

those aspects of a place that improve people's health wellbeing and quality of life, currently, and those that need to be targeted for improvement. Uniquely, it also helps to highlight the impacts that climate change will have on places. The tool provides a simple framework, already well-used to structure our conversations with local communities.

6.5 Our Outcomes for Greening Places & Communities

NHS Grampian will:

1. Increase the amount of quality green spaces within our estate and promote the restoration of areas deficient in ecological quality through habitat creation as well as changes to landscape management.
2. Contribute to the creation of more accessible green and blue spaces to support climate-change adaptation, promote biodiversity, and support the promotion of human and environmental health;
3. Collaborate with the communities it serves for the best use of green spaces and;
4. Develop the capacity to use all facets of the PHS (Public Health Scotland) Place Standard Tool, but especially the new 'Climate Lens,' to work with partners engaged in community planning and community empowerment.

7.0 Collaboration across local and national systems

The Climate Emergency is not one that can be addressed by the NHS alone. Partnership working is essential if NHS Grampian is to support and deliver its aims.

As an anchor organisation, we are already beginning to make active contributions to supporting climate emergency adaptations and promoting environmental sustainability. Now we need to seize the opportunities for collaborating with our local authority and public bodies partners, the third sector organisations we work with, and with the much wider commercial and industrial sectors to innovate and develop novel approaches to adaptation if collectively we are to achieve our outcomes

This will involve working jointly through existing relationships and also be developing new relationships where required. In engaging and collaborating with partners on sustainability, we can help materialise additional benefits for human and environmental health and collectively develop the necessary adaptations that can mitigate the impact of the climate emergency.

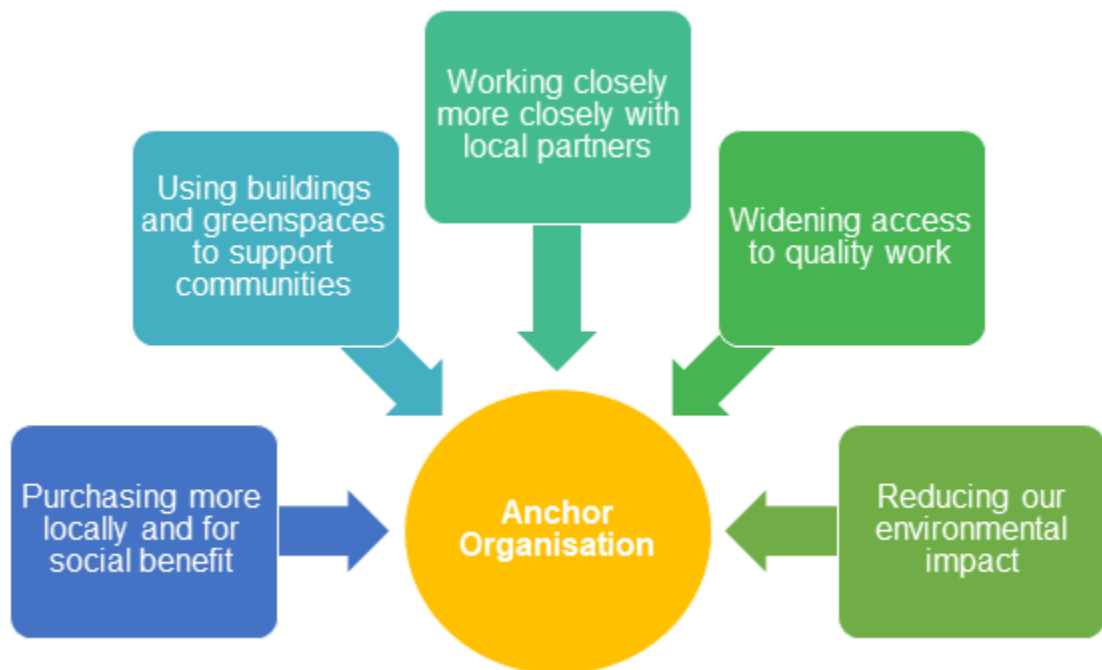


Figure 5: NHS Grampian is rooted in the North East Scotland community. Through our size and scale, we can positively contribute to areas beyond providing health care. Through our influence, we can benefit the health and wellbeing of our local communities, by choosing to invest and work with others locally and responsibly

7.1 Active Travel

NHS Grampian's Plan for the Future commits the organisation to be an active partner in active travel as a part of sustainable community development, planning and integrating with work that is already being done by others. Through dialogue with staff and patients, we can support them to make

appropriate travel choices and work with communities and partners to support sustainable travel to our healthcare places.

7.2 Environmental Awareness & Shared Learning

NHS Grampian will engage with the communities we serve with local authority partners and organisations to share learning on sustainability. This will allow us to understand how they are minimising their environmental impact and adapting to the climate emergency, and what they expect from NHS Grampian to support this change.

7.3 Local Planning

NHS Grampian has a contribution to make in the existing framework of Local Development Plans, Local Outcome Improvement Plans and Integration Joint Board (IJB) Delivery Plans. In doing so, it will embed climate-change adaption and environmental sustainability as partners within the commissioning and delivery of these plans.

NHS Grampian is also committed to working with partners to collectively realise the additional benefits in areas as transport planning (e.g. supporting active travel), spatial and development planning (e.g. land use), environmental protection (e.g. flood management), and promoting biodiversity (use and development of green spaces).

7.4 Collaboration for Additional Benefits

Although we are at the early stages of partner collaboration, we see the potential for reducing the type of inequalities that contribute towards health inequalities. Some examples of co-benefits are detailed below:

Existing Health & Health Care Intervention	Potential Climate Emergency & Sustainability Benefits
Poverty (child/fuel/food)	Promotion of environmental sustainability alongside financial resilience (individually and organisationally), improvements in wellbeing
Active Travel	Improvements in physical activity, reduction in single fossil fuel vehicle use / reduction in km travelled by fossil fuel vehicles (in line with Transport Scotland national targets)
Natural Health Service	Promoting greenspace (and blue-space) use contributing towards wellbeing, promoting

	greater understanding of the need to protect biodiversity outside of the NHS Estate
Disease prevention (diabetes/heart disease/COPD etc.)	Secondary prevention via behavioural risk management, reduction in greenhouse gas consequences of preventative interventions over care service interventions
Healthy eating / obesity	Reduction in unhealthy weight, reduction in continued obesogenic environments and poor nutrition associated with consumption of highly processed, energy dense foods
Twenty minute neighbourhoods	Promotion place and wellbeing / physical activity through walkable communities, reduction in fossil fuel vehicle use.
Tele-health / Tele-care	Secondary prevention via behavioural risk management, reduction in greenhouse gas consequences of preventative interventions over care service interventions
Mental health promotion	Horticultural approaches promote greenspace (and blue-space) use for mental health and wellbeing, promoting greater understanding of the need to protect biodiversity
Social isolation & loneliness	
Substance use recovery	

Figure 7: Existing NHS Grampian health improvement / health inequality reduction activities and potential climate emergency and environmental sustainability benefits.

7.5 Our Outcomes for Collaborations across Local and National Systems

NHS Grampian will:

- 1 Extend and develop its partner collaboration to deliver climate adaptation and environmental sustainability action. It will be active in working with Community Planning Partnerships; Local Development Planning; Integrated Joint Boards, and its wider stakeholders to deliver meaningful benefits;
- 2 Place the climate adaptation and human and environmental health as a key aspect of the work of the North East Population Health Alliance; and
- 3 Work with academic and research partners to identify the ways in which it can create additional benefits for promoting human and planetary health and preventing the types of health inequalities that are likely to determine our future health.

8.0 Conclusion

NHS Grampian can be an ambitious organisation aiming to become a leading organisation in adapting to the consequences of the climate emergency and promoting environmental sustainability and biodiversity.

This strategic framework outlines key outcomes that we intend to achieve by 2028. Detailed actions and progress measurement will be defined in the NHS Grampian Climate Emergency & Sustainability Delivery Plans.

These are aligned to the existing National Sustainability Assessment Tool, Environmental Management System, Climate Change Risk Assessment, Green Public Sector Estate Decarbonisation Scheme, NHS Grampian Electric Vehicle Transition, NHS Grampian's Heat and Power Strategy, and NHS Grampian Net Zero Routemap.

9.0 Reference Documentation

Reference Document	Location and Description
NHS Scotland's Climate Emergency & Sustainability Strategy & Policy for NHS Scotland	This document sets out plans for NHS Scotland to reduce its greenhouse gas emissions and impact on the environment, adapt to climate change and to better contribute to the United Nation sustainable development goals. It has been developed by the Scottish Government and NHS Scotland Assure.
Scottish Green Public Sector Estate Decarbonisation Scheme	The Scottish Green Public Sector Estate Decarbonisation Scheme launched in June 2021 and acts as the main government-led capital funding mechanism to support leadership for decarbonisation of public buildings
National Sustainability Assessment Tool	This self-assessment tool enables boards to assess their overall sustainability performance.
NHS Grampian Net Zero Routemap Report 2023 (in development)	The development of this Net Zero Routemap (NZR) is a critical step in establishing the coordinated and consistent delivery of NHS Scotland's obligations under The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. It sets out the most economically viable cost modelled pathway for NHS Grampian Health Board (NHS Grampian) to achieve Net Zero operational emissions target by 2040, utilising both established and emergent energy technologies.
NHS Grampian Heat and Power Strategy (in development)	This strategy document is written as a reference for NHS Grampian's actions in relation to the Climate Emergency and the national targets for net zero heating (2038) and power (2040). This strategy complements the NHS Grampian Net Zero Routemap Carbon Emission Baseline Report.
NHS Grampian Electric Vehicle Transition (in development)	NHS Grampians vehicle fleet transition away from fossil fuel reliance is based on its commitment to the Scottish

	Governments national targets set out in DL (2021) 38
NHS Grampian Environment Management System (in development)	An environmental management system (EMS) is similar to other management systems, such as those that manage quality or safety. It assesses your business' strengths and weaknesses, helps you identify and manage significant environmental impacts, saves you money by increasing efficiency, ensures you comply with environmental legislation and provides benchmarks for improvements.

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