

Rail Regulation and Standards
Strategy and Investment

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REVISED ENVIRONMENTAL POLICY GUIDANCE - A CONSULTATION RESPONSE

Thank you for the opportunity to respond to this consultation. Transport Scotland offers the following comment

Paragraph 2 of Covering Letter to the consultation confirms that, as a condition of their licence, "**Licence holders are required to establish and maintain written environmental policies**". It is recommended that this licence condition should be extended to also include the requirement to gather data, where applicable, to meet the industry's agreed KPI objectives as detailed in see Annex A of the draft guidance. Making this requirement mandatory would ensure that the reporting of KPI's would reflect the industry as a whole and not just the businesses that choose to collect and report on this data. This is currently only a suggestion under paragraph 7 of the draft guidance document.

I have no other suggested changes to this draft guidance.

Yours Sincerely

Alan Martin
Network Regulation Manager