

**From:** [REDACTED]  
**To:** [Subsidy Advice Unit](#)  
**Subject:** Operation of Subsidy Control Functions: Guidance  
**Date:** 19 July 2022 14:45:53

---

I wish to make the following very brief comments on a wholly personal basis in response to the consultation on the above Draft Guidance.

1. This is largely a feature of the whole new regime, rather than a specific issue with this document, but environmental considerations, including the impact on the climate and biodiversity crises, do not feature as strongly as one might wish. In the context of the specific Guidance, environmental issues should be included in the Prioritisation Principles since the economic drivers provided by subsidies are of great significance in promoting or thwarting the Just Transition to a more environment-friendly future that is vital for both industry and society.
2. The document could be clearer on how the functions described here will operate in relation to the devolved administrations and their separate powers and lines of accountability and how far the impact of regulatory and practical divergence across the UK will be considered.
3. It would be welcome if in relation to publicity the document could be more explicit about how the proposals fit with the obligations under the Freedom of Information Act 2000 and the Environmental Information Regulations 2004 (and the Freedom of Information (Scotland) Act 2002 and Environmental Information (Scotland) Regulations 2004 if applicable).

Prof Colin T Reid

**Colin T Reid**

Professor of Environmental Law

Dundee Law School, University of Dundee

[Transforming lives, locally and globally](#)

University of Dundee, Nethergate, Dundee, Scotland, UK, DD1 4HN

The University of Dundee is a registered Scottish Charity, No: SC015096