

# CONSULTATION ON PROPOSAL FOR A SCOTTISH CLIMATE CHANGE BILL

## 1. QUESTIONS AND ANSWERS

### TARGETS

1. Should a Scottish target be based on carbon dioxide only or the basket of six greenhouse gases?

The Scottish target should be based on the basket of six greenhouse gases. While it is sensible to concentrate reduction efforts on the big three (i.e. CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O), it is essential to have the other three within the target for two reasons: (1) to ensure their level, which has increased dramatically from a low base in 1990<sup>1</sup>, is regularly scrutinized; and (2) to provide consistency and comparability with reductions under the Kyoto framework.

2. Should the Bill contain provisions to alter which gases are included, for example if the reliability of data for a particular gas improves or if science changes in the future about which gases cause climate change?

Yes.

3. The Scottish government wishes to ensure that the Bill gives sufficient incentives to invest in energy efficiency and renewable electricity. Should the targets be based on source emissions; an end-user inventory; or on individual targets for energy efficiency and renewable electricity? Do you have any other suggestions?

The target should be based on the source emissions (i.e. direct emissions from power stations and refineries, transport, industry, commerce and the domestic sector). The end-user inventory should continue to be compiled and reported.

To address energy efficiency in the production of electricity, all generating companies should be encouraged to move into combined heat and power, and should be 'punished' if they do not.

To address energy efficiency in the home all housing association and council housing stock should be made highly energy efficient with immediate effect, through draft proofing and insulation.

Feed-in Tariffs<sup>2</sup> should be introduced to encourage renewable electricity generation. This policy has been very successfully adopted by Spain, Germany and Denmark. In this system, electricity companies are obliged to buy power generated on a small scale from renewable sources for above

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<sup>1</sup> [Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990 – 2005](http://www.naei.org.uk/reports.php?list=GHG), <http://www.naei.org.uk/reports.php?list=GHG>

<sup>2</sup> Feed-In Tariffs, Boosting Energy for our Future, [http://www.worldfuturecouncil.org/fileadmin/user\\_upload/Maja/Feed-in\\_Tariffs\\_WFC\\_pdf](http://www.worldfuturecouncil.org/fileadmin/user_upload/Maja/Feed-in_Tariffs_WFC_pdf)

market prices fixed over a 20 year period. This is demonstrated to increase the amount of small-scale renewable energy generation (in Germany there are over 300,000 photovoltaic installations, mainly on the roofs of ordinary people)<sup>3</sup> from many locations including individual homes, companies and even schools because it means a guaranteed price for their contribution to the grid, and therefore a quicker return on their investment.<sup>4</sup> The Energy Saving Trust's study showed that by 2050 microgeneration could provide 30-40% of the UK's electricity needs. This is an ideal way to

- a) increase the efficiency of space, as small scale renewable generation can be fitted onto existing buildings (reducing the planning burden).
- b) reduce the dilemma around large-scale proposed developments which may increase renewable energy generation but at often at huge expense of destroying natural beauty and installing large-scale cables, power lines etc through pristine environments.
- c) increasing economic diversity and thus resilience
- d) support Scottish businesses which could flourish in making and selling microgenerators here if feed-in-tariffs were introduced.

Energy efficiency must be encouraged in road transport emissions . The Scottish Government must have the courage to tackle our car culture and overhaul current transport spending priorities in favour of pedestrians, cyclists and bus users. Through encouraging segregated cycle-only lanes on all major roads in towns and cities; increasing pedestrian-only areas; stopping the building of more main roads, especially motorways; and discouraging road haulage through taxation. City and rural buses should be made more energy efficient and electric buses (run on on-site renewable electricity generators) should be thoroughly researched and then rolled out across the country.

Emissions in the aviation sector are growing faster than in any other sector of the economy. The respected Tyndall Centre for Climate Change Research has calculated that if aviation continues to grow in the UK on a business as usual path it could take up the country's entire carbon budget by 2050<sup>5</sup>. The Scottish Climate Change Bill must show leadership on this issue by including these in the targets it sets. It needs to state that no further airport expansions are permissible, that

4. Do you agree that the Bill should allow the means of measuring the target to be changed through secondary legislation to reflect international developments or unforeseen consequences of the Bill?

Yes.

5. Should the emissions reduction target take account of the abatement effort made by companies under emissions trading schemes? If so. How?

Yes, the target should include the emissions of all industrial activities in Scotland , as well as recording and monitoring emissions from Scottish companies in other countries.

6. Do you agree that international credits should be counted towards Scottish targets?  
Should there be limits on credits counted towards Scottish targets?

Set a zero or very low limit to the amount of credits that can count towards Scottish targets in order to show that we were serious in our intent to decarbonise our economy.

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<sup>3</sup> Power From the People: Why Germany Leads the Way in Microgeneration: Permaculture Magazine No 55, Spring 2008.

<sup>4</sup> See also <http://www.epia.org/index.php?id=86>

<sup>5</sup> Growth scenarios for EU & UK aviation: contradictions with climate policy, [http://www.tyndall.ac.uk/publications/working\\_papers/wp84\\_summary.shtml](http://www.tyndall.ac.uk/publications/working_papers/wp84_summary.shtml)

7. Should the Bill allow the level of the 2050 target to be changed through secondary legislation? If so, should this only be allowed on the basis of independent, expert advice, to reflect international developments or unforeseen consequences of the Bill? Should any changes to the target be limited to an increase in the target?

Yes, the Bill should allow the target or more accurately the reduction path to be tightened at the end of each budget period following a review of the latest developments in the scientific consensus presented in the IPCC assessment reports<sup>6</sup>. In order to provide certainty, the target should not be relaxed.

If the Scottish Government holds to the currently proposed reduction of 80% by 2050, it should have the courage to make clear to the Scottish people that this is what it considers to be politically feasible rather than what actually necessary for Scots to play their fair part in averting dangerous climate change.

The consultation document contains a table from the latest IPCC assessment report<sup>7</sup>, which estimates that a *global* reduction in greenhouse gas emissions of around 80% from year 2000 levels will be needed to ensure warming remains below the “safe level” of 2 degrees centigrade. This means that allowing for global population growth<sup>8</sup>, per capita global emissions will have to fall to just under 1 tonne of CO<sub>2</sub> equivalent. This is considerably less than the 2.6 tonnes implied in the Scottish Government’s 80% proposal. In fact, Scotland’s fair share reduction target would be a 92.5% cut from 1990 levels.

#### SUPPORTING FRAMEWORK

8. What factors should be taken into account when setting the level of budgets?

Our scientific knowledge of climate change and its impacts on the planet’s ability to support human and other life should be the primary consideration in setting the level of the budgets.

Larger reductions will be possible in the early years and we agree that the proposed annual percentage reduction is the correct approach combined with an option to “bank” savings.

9. How long should interim budget periods be?

Budget periods should be in line with the UK Climate Change Bill periods. This is currently 5 years.

10. How many years in advance should emissions budget periods be set in order to provide sufficient time to develop infrastructure?

Emissions should be set for all budget periods up to 2050. Emissions should be set for one additional period at the end of each period.

11. What should be the limit (in terms of absolute quantity or as a percentage of the budget period on the amount of emissions), which the Government can borrow from a following budget period?

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<sup>6</sup> International Panel on Climate Change Assessment Reports, <http://www.ipcc.ch/ipccreports/assessments-reports.htm>

<sup>7</sup> IPCC Fourth Assessment Report, <http://www.ipcc.ch/ipccreports/ar4-syr.htm>

<sup>8</sup> UN Press Release POP/952, <http://www.un.org/News/Press/docs//2007/pop952.doc.htm>

Government should not be allowed to borrow from future budgets. Flexibility should be achieved by allowing savings to be accumulated and carried over from previous years.

12. Should the Bill include an interim point target? If so, what year or years? Should it be for (2020, 2032, 2030, etc)? How should the level be chosen?

By adopting an annual percentage reduction, interim targets are automatically generated. The emphasis should be on trying to maintain steady progress along this concave reduction path.

#### REPORTING SCRUTINY AND FRAMEWORK

13. Should the Scottish Ministers be required to report on any other issues related to climate change in addition to the requirements already set out. Is, what and how often?

Aviation should be included and must be reported on.

14. Is a process of Parliamentary scrutiny the appropriate way of holding the Scottish Government to account if targets or budgets are not met?
15. What should be the primary source of advice to the Scottish Government for setting emissions target r budgets and why? Options include: the proposed UK Committee on Climate Change, a new Scottish Committee on climate Change, an existing public body in Scotland, or the Scottish Government itself.
16. If it were to be an existing Scottish public body, which public body is most suited to carrying out his task and why?
17. Which organisation should be tasked with monitoring the progress of the Scottish Government on reducing emissions and why? ? Options include: the proposed UK Committee on Climate Change, a new Scottish Committee on Climate Change, an existing public body in Scotland, or the Scottish Government itself.

This should definitely not be done by the Scottish Government since they cannot be independent. All monitors should be scrutinized by an independent body composed of leaders in the field throughout Scotland.

18. If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?
19. Should additional independent mechanisms for scrutinising the effectiveness of the Scottish Government's policies in reducing emissions be created by the Bill (in addition to any scrutiny already provided by the Scottish Parliament)?
20. If so, which organisation is best placed to carry out this function and why? Options included a new Scottish committee on Climate Change or an existing public body in Scotland.
21. If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?
22. Are there any other functions related to climate change, existing or new, which should be carried out at arm's length from the Scottish Government and why?

#### SUPPORTING MEASURES

23. Should the Bill contain enabling powers to introduce a duty on certain parts of the public sector (i.e. local authorities and large public bodies) to take specified actions on climate change or other specified environmental issues? Why?

Yes. The Carbon Reduction Commitment will require local authorities, large public sector bodies and businesses currently not covered by the EU ETS to reduce their

emissions by 1.1MtC by 2020. This may not be enough to enable those operating in Scotland to contribute their fair share to achieving the Scottish reductions targets set by the bill.

24. What should such a duty (or duties) include?

The Scottish Government should consider how it can incentivise these organisations to fulfil their commitments. Where they receive funding from the Scottish Government, a portion of this funding should be made conditional upon the organisations achieving the Scottish emissions reductions target.

Currently Scotland leads the UK on planning requirements for on and near-site low-carbon energy generation for new developments. Currently these require large new developments to perform 15% better than 2002 Scottish Building Regulations. This percentage should be raised year on year.

25. Should the Bill contain enabling powers to introduce statutory guidance for certain public sector bodies (i.e. local authorities and large public bodies) on specified climate change or other environmental measure? Why? Are there gaps in any existing guidance?

26. What should this guidance include?

27. Should the Bill contain enabling powers to create a requirement of certain public sector bodies (i.e. local authorities and large public sector bodies) to make regular reports on specific measures they are taking to tackle climate change (whether mitigation or adaptation) or other environmental issues? Why? What should be included in such reports?

These should be reported in order to allow transparency as the issue of climate change is very important to constituents and businesses. They want to know what their elected representatives (e.g. local councillors and MSPs) are doing to lead their organisations to reduce greenhouse gas emissions. These reports should include all the summary measures of their greenhouse gas emissions over the last 4 years, together with all major plans to reduce them.

28. As a potential non-legislative measure, should current Best Value guidance be amended to take specific account of climate change mitigation and adaptation? If so, how should Best Value guidance be amended?

29. Are there any amendments to existing legislation or any enabling powers needed to allow for variable charging (for example by local authorities) to incentivise action or eliminate perverse incentives?

30. Are there any provisions to help Scotland adapt to the impacts of climate change which should be included in the Scottish Climate Change Bill?

31. Should provisions within the Environmental Assessment (Scotland) Act 2005, be amended in order to provide clearer links with emissions reduction? If so, how should this be done?

32. What are the equalities implications of the measures in the proposals for the Scottish Climate Change Bill?

Greenhouse gas emissions are strongly correlated with levels of wealth and income. Low-income households are generally lower than average emitters. They are also likely to suffer first as the cost of emitting rises. This is unjust. The bill provides the Scottish Government with an opportunity to highlight and address this issue by setting higher targets to reduce fuel poverty. As suggested above (question 3) as a high priority the energy efficiency of low income households' houses, particularly council and housing association owned properties, should be made highly energy efficient with a roll-out program starting immediately. .

33. Is there any existing legislation within the competence of the Scottish Parliament (devolved) which needs to be amended so that appropriate action on climate change can be taken by sectors of society?