

Dear Mr. Henderson,

I have responded below to the consultation on a Scottish Climate Change Bill.

Q1. Response:

The basket of greenhouse gases should be considered.

Q2. Response:

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?

There should be provisions to monitor additional greenhouse gases in the unlikely event that other gases are seen as better indicators or that we should be aware of our increasing emissions from gases not currently included in the basket. However, it should not be possible to reduce the amount of gases, from six, that are monitored.

Q3. Response:

I think you need targets to be based on source emissions, while monitoring end-user emissions to avoid any emissions "loophole". Emissions need to be chased as far upstream as possible. Additionally, having soft targets for energy efficiency and renewable electricity should be part of the plan.

Q4. Response:

There should be room to allow for further reducing the emissions targets, whether it be at source or through end-user monitoring, but there should be no way, through any secondary legislation, to soften the targets.

Q5. Response:

Ignoring the EU ETS would be a mistake, even though that system is fundamentally flawed (<http://www.feasta.org/documents/energy/emissions2007.htm>). The Scottish system should be compatible with the current form of the ETS in Europe. Allocation of permits, as in giving away free permits which are worth money to corporations who can then sell them on to make money, is an awful idea and one that was heavily exploited during the first phase of the EU ETS. This loophole must be closed. Yearly reductions of 3-5% to begin with should be introduced and a long term target of 90-100% should be attempted. It is potentially feasible to, in the future, reduce emissions by 110% and would send a strong message to Westminster about how far behind they are in their current plan. Even 80% at this stage won't do nearly enough. The cuts can be slow at first while gradually increasing over time.

Q6. Response:

The integration of the new Scottish Climate Change Bill and Europe's plan to tackle Kyoto (EU ETS) must be well planned. Perhaps limiting the amount of international credits that can be counted towards Scottish targets would be an idea, to be able to stop Scottish

emissions from just being "offset" through international schemes. A percentage could be implemented, whereby if you reduced Scottish emissions by 20%, then say 5% of that could come from international credits (figures just used to demonstrate the point).

Q7. Response:

The 2050 target should only be altered to show deeper cuts in emissions. It should be made nearly impossible to weaken the target.

Q8. Response:

If economic growth is fully taken into consideration, it will skew the targets. The economy right now relies on cheap fossil fuels and we need to de-carbonise the economy. Although we should be aware of harming the Scottish economy unnecessarily, we should not allow the economy to prevent action being taken. Population growth should be taken into consideration as well as technological progress to advance the reduction targets. Social and environmental impacts should not be ignored, nor should international circumstances. If the scientific community decides that targets need to be altered and the IPCC is pushing for such changes, then this should be represented in the budgets.

Q9. Response:

Interim budget periods should be 1-2 years.

Q10. Response:

Emissions budgets should be set 20 years in advance, or as early as possible. This would allow a smoother transition.

Q11. Response:

Ideally, there would be no need for borrowing. Less than 10% should be allowed for borrowing.

Q12. Response:

For comparison purposes, the interim target should be 2020 and emissions should be reduced by 60% at this stage.

Q13. Response:

Scottish Ministers should have to predict the current and future emissions by sector on an annual basis, making the information publicly and readily available.

Q.14 Response:

It should be made illegal for governments to exceed their emissions budgets and miss targets.

Q15. Response:

A "made-in-Scotland" approach must be taken: a Scottish Committee on Climate Change needs to be set up.

Q16. Response:

N/A

Q17. Response:

The Scottish Climate Change Committee.

Q18. Response:

N/A

Q19. Response:

Scrutiny will come from the new Scottish Climate Change Committee.

Q20. Response:

N/A

Q21. Response:

N/A

Q22. Response:

This should be examined in detail when setting up the new Scottish Climate Change Committee.

Q23. / Q24. Response:

The bill must contain enabling powers to introduce duties on the public sector to ensure action is taken. The local authorities and large public bodies could then be told what percentage of emissions they were responsible for and given their own reduction targets.

Q25. Response:

The Bill should contain enabling powers to introduce statutory guidance for local authorities and large public bodies as micro-management of these areas will cause further reductions in the national targets.

Q26. Response:

Guidance should include management of emissions in the relevant public sectors.

Q27. Response:

Public sector bodies should make regular and detailed reports which are easily comparable. Subsequently, the various public sector bodies should be ranked by emissions reductions and publicly scrutinised.

Q28. Response:

Best Value guidance reflects the idea that markets will solve the problem. That is true only when the market has an embedded carbon price within it. Until that time, additional measures should be put in place to account for the effects climate change.

Q29. Response:

Variable charging is needed at the local level, through local authorities, in order to make the necessary changes to ensure we meet our targets.

Q30. Response:

If adaptation is included in the Climate Change Bill, it should not be able to come into effect until after 2020.

Q31. Response:

Provisions within the Environmental Assessment (Scotland) Act 2005 should be amended in order to provide clearer links with emissions reduction. The Scottish Climate Change Committee could advise on how best to approach this.

Q32. Response:

The economy will no doubt be affected. That does not change the fact that we need action on climate change and we need it now. Economists should advise on how best to limit the damage done to the Scottish economy, but this should not change the targets.

Q33. Response:

I am not aware of any such existing legislation but if any does exist which prevents action from being taken on climate change, it will need to be amended.

Two further comments:

1. The ideal situation to solve the climate change dilemma would be to implement Cap and Share (www.capandshare.org) and get Westminster on board. In isolation, the solution would have its problems, as will any approach that focuses solely on Scotland. Research is underway to examine the impacts of a Cap and Share approach to transportation fuels in Ireland. Discussions should be made between the Dail in Ireland and Westminster in England to examine the possibility of a joint Cap and Share approach to emissions. More details on the website.

2. Fuel poverty will play a bigger role in any attempt to reduce emissions. If we could only just raise the price of fossil fuels and people would use less, that might solve the problem. Unfortunately, when fossil fuel prices surge, fuel poverty takes more victims. There should

be fuel poverty protection worked into the Climate Change Bill, or perhaps let it be a focus of the new Scottish Climate Change Committee.

Thank you for the opportunity to respond.

Brendan Patrick Callery