



## CONSULTATION ON PROPOSALS FOR A SCOTTISH CLIMATE CHANGE BILL

### RESPONSE BY THE CHURCH OF SCOTLAND

April 2008

## Introduction

**1. The Church of Scotland welcomes the publication of proposals for a Scottish Climate Change Bill and endorses the proposal to cut emissions of greenhouse gases by 80% by 2050.**

2. This response sets out why the Church thinks the Bill is important and answers some of the specific questions posed by the Scottish Government. It also suggests that the Government will need to do more to publicise the Bill if it is to be effective; and asks how the Bill relates to other Government proposals such as the New National Planning Guidelines.

## Why is the Church of Scotland Interested in Climate Change?

3. For the Church, climate change is primarily an ethical issue.

*The Church of Scotland is concerned that climate change poses a serious and immediate threat to people everywhere, particularly to the poor of the earth; and that climate change represents a failure in our stewardship of God's creation. We accept the need to reduce the emissions of greenhouse gases urgently to avoid dangerous and irreversible climate change; and to promote a more equitable and sustainable use of energy.*

4. This is not a marginal issue for the Church but an issue of theological and practical importance. We warmly welcome the proposals and wish to work with the Scottish Government to contribute to their implementation. Our comments on the Bill relate to omissions rather than the direction and purpose of the Bill.

## Why Have A Bill?

5. The Government sets out four reasons why a Bill is necessary. It proposes to create mandatory climate change targets:

- to drive decisions in government and business;
- to create and enable new means of reducing emissions and adapting to climate change;
- to play our part in global action on climate change; and
- to provide a strong example to other countries showing what can be done.

*To these the Church suggests that the Government adds another:*

- To help people in Scotland understand and respond positively to climate change

6. The Bill provides an opportunity to help raise awareness of climate change and create an atmosphere in which everybody living in Scotland can respond positively to the challenge of climate change. If we are to meet the 80% target there will have to be substantial changes in the lives of people across Scotland: in the way we heat our homes, travel to work, travel on holiday; how we shop for food or goods and buy services. Behaviour and habits we have come to adopt and regard as normal will need to be challenged; for example that we can drive cars of any size as often as we like and wherever we like, irrespective of the amount of fuel they consume or the emissions they make; that we can fly abroad on holiday or for business once, twice or more often in a year; or that we can enjoy fresh food flown half way around the world.

### **Awareness and Action**

7. Whether we can continue with such everyday activities in a low carbon economy is an open question. There will be difficult decisions for people across Scotland and possibly sacrifices in our enjoyment of some material goods and services. The Bill is a crucial step in encouraging people to think about these issues and helping them to face up to the difficult decisions that lie ahead. The scale of the challenge is enormous and a technocratic approach setting targets for government and business will not be enough to ensure the success of the Bill.

8. A parallel could be made with the successful introduction of a smoking ban in Scotland. The Government was successful through the Smoking, Health and Social Care (Scotland) Act 2005 in focusing attention on smoking in public places. The legislation was associated with a substantial and wide ranging campaign to raise awareness of the legislation and drive home the message that smoking in public places is unacceptable. The implementation of the legislation was effective and produced an immediate result, leading to cleaner air and healthier lives. The success of the smoking ban might provide a lesson for tackling climate change: public awareness and public acceptance of the issue will be critical to the success of the legislation.

9. The Church has a role to play here, especially through the Eco Congregation Scotland network. The network now includes over 180 congregations across Scotland; congregations that have taken steps to address environmental concerns in their life and in their communities. The network has recognised the importance of climate change and could provide a valuable resource to help spread awareness and develop action across Scotland.

### **The Context and the Background**

10. The Church recognises the serious consequences of climate change set out in the consultation document and the likely impacts on Scotland. The ethical issues for the church are two fold. First, climate change represents a massive failure in our stewardship of the earth. The Report to the General Assembly 2007 *Energy for A*

*Changing Climate* makes the point that good stewardship is not an option for the Church.

*It is not an optional extra for Christians to be concerned about God's creation. It is written into the very charter of our belief. To be a Christian is to care for what God cares for, God's creation, its creatures and all people, and especially the poorest, marginalised and those now most vulnerable to the consequences of the excesses of our energy consumption.*<sup>1</sup>

The Report also made clear that care for the earth and care for other people are inseparable. If as a consequence of our actions we cause harm to others elsewhere on the earth then we have failed in our duties to care for the earth.

11. This strongly suggests the need for a global vision and the commitment of the Government to take an international lead is to be commended. The Church, through its World Mission partners, is acutely aware of the hazards facing people in countries around the world. Information we receive from partners in Bangladesh, Nepal, Malawi and elsewhere heightens our concern about the human consequences of climate change in developing countries and reinforces the need for action in rich countries like Scotland.

## **Targets**

12. The Government proposals include a number of technical issues and questions. It would not be appropriate for the Church to comment in detail on many of these issues as our main interest is ethical, not technical. The Church is a member of the *Stop Climate Chaos* coalition and supports the key demands of the coalition on targets. In particular it would be helpful to have clear interim targets. Meetings with congregations across Scotland suggest that many people find the 80% target incomprehensibly large, too distant and too daunting. For these reasons a year on year target of 3% would be helpful. We recognise that there are fluctuations in carbon emissions from year to year but an annual target would help churches, congregations and communities as well as government departments, councils, health boards, businesses, etc. to think about and respond to climate change. The annual target would also make a useful basis for the annual report of Scottish Ministers to Parliament.

## **Delays and Omissions**

13. The Bill is silent on a range of issues. While it sets an ambitious target it says little about how the target will be achieved. It is suggested in paragraph 4.54 that at a future date a new programme will be required to replace *Changing our Ways*, Scotland's current climate change programme, published in 2006. In paragraph 4.55 it is also suggested that in future all public spending decisions must take account of and contribute to action to meet emissions targets, which is clearly not happening at present. These commitments to future action are welcome but the potential delays are a concern and may give rise to inertia or a 'business as usual' mentality while a new climate change programme is developed.

14. For example the nine major planning infrastructure decisions announced shortly before the publication of the Climate Change Bill consultation include projects that

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<sup>1</sup> Reports to the General Assembly 2007 *Energy for A Changing Climate*, para. 2.1.3.

are likely to lead to an increase in greenhouse gas emissions<sup>2</sup>. If the projects included in the National Planning Framework are not subject to critical scrutiny now then an opportunity is lost to take quick action and prevent further emissions of greenhouse gases. If major decisions concerning the implementation of the 80% target are left to a future replacement for *Changing our Ways*, which could be two or more years hence, decisions to proceed with the infrastructure projects may have been taken, decisions which will probably lead to an increase in greenhouse gas emissions.

15. It would also be helpful to give a quick boost to local energy efficiency and regeneration. The provisions of the existing Energy Efficiency and Microgeneration Bill could be adopted as part of the Bill. It offers the opportunity to help reduce CO2 emissions, tackle fuel poverty and promote local and community involvement in climate change awareness and action. Including these provisions in the Climate Change Bill would help to avoid the time delay inherent in the current approach.

## Conclusion

16. The Bill is a milestone in responding to climate change. It offers the opportunity help improve our stewardship of the earth but the challenges it sets are daunting. The Bill as it stands will not reduce carbon emissions: the targets it sets must inform all aspects of government policy in Scotland, public services, economic development and business; and the lives of people across Scotland. The Government will need faith to achieve its target: the Church has faith that it can and must be achieved.

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<sup>2</sup> Nine infrastructure projects have been identified as potential national developments in the second *National Planning Framework, a vision for Scotland's development to 2030*, published by the Scottish Government, 8 January 2008. The projects include: a replacement Forth crossing; enhancements to Edinburgh and Glasgow airports; enhanced access to the Grangemouth Freight Hub; the Rosyth International Container Terminal; and the Scapa Flow Container Transshipment Facility. The Strategic Environment Assessment published with the framework suggests that these transport related projects **will** lead to an increase in greenhouse gas emissions. See paragraph 3.30 of *National Planning Framework 2 SEA Environmental Report*, Scottish Government, January 2008.