

COSLA Response – Scotland’s Climate Change Bill Consultation

Introduction

Climate Change is a high priority matter of great importance to COSLA and its member councils. Indeed all 32 of Scotland’s Local Authorities have signed up to Scotland’s Climate Change Declaration, a voluntary agreement to work towards climate change mitigation and adaptation, requiring significant commitments of councils to act in this area. Local Authorities will now be progressing this work under the new Single Outcome Agreements between the Scottish Government and councils.

Local Authorities in Scotland are keen to see clear, joined up leadership on the climate change agenda. For this reason COSLA’s Regeneration and Sustainability Spokesperson Cllr Alison Hay has been lobbying for some time for political leadership to be demonstrated through the creation of a Scottish Steering Group on Climate Change. This would include high level decision makers from Scottish and Local Government, the voluntary and business sector. Such a group would bring together those opinion formers and decision makers who are able to bring about real change within their own organisations and act as Scottish champions in tackling climate change.

Scotland’s Climate Change Bill will be an important step towards providing this strong leadership and putting forward a framework for action. COSLA members are supportive of the ambitious proposals for an 80% emissions reduction target for 2050. We believe that it is right that Scotland should seek to lead the way in the United Kingdom on emissions targets and investment in renewable energy technologies. Progress on both will enable us to be even more ambitious in the years to come. Indeed, COSLA has long argued for an integrated Scottish Energy strategy and encouragement for the development of renewable technologies.

COSLA’s Climate Change Bill Task Group has approved this response and will be following the progress of both the consultation and the ensuing Bill in its progress through the Scottish Parliament. The group which met for the first time this April is also expected to grow in scope to become a standing COSLA Climate Change Working Group looking at issues such as the Local Authority Climate Change Declaration process; UK Climate Change and Energy policy, and other related work requiring input at a political level within COSLA.

If we are truly to respond to the challenges presented by Climate Change, we need to be ambitious in what we are prepared to do for the people on the planet, and those who are yet to be born. Obviously we must make quick progress on mitigation and adaptation measures, but a technological fix alone will not be sufficient. We are in no doubt that the public understands and has views on the effects of their current consumption beyond Scotland’s borders. The rapid growth in the use of fair-trade products is good starting evidence of this.

We need to be prepared to go further and seriously look at the effects of past, current and future growth in consumption. We cannot afford to be afraid to take some tough decisions, that would currently be unpopular. The debate about protecting the environment needs to move beyond recycling and charging 10 pence for plastic bags. If we are really to meet the challenges of social and environmental justice we need to be prepared for a debate on the fundamental values and priorities of our society and the effects these have on our stewardship of the planet. Support is going to be required for a range of complementary action across a range of governmental policy areas. Ultimately this will require difficult decisions to be made collectively affecting personal choice and responsibility, as well as individual aspirations and

the general way we lead our lives. We must work with the people of Scotland to develop the consensus and political will that will be needed, so that we can act locally, nationally and as part of the international community. Clearly there are no genuinely simple answers, and acting alone will make no sense.

TARGETS

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

COSLA agrees that it is appropriate for targets to be set for the basket of 6 Greenhouse Gases (GHGs), given the varying impact to the environment of their emission.

For ease of data collection and reporting COSLA would advocate that the basket of all 6 be translated into a CO₂ equivalent as this provides the element of simplicity in terms of communication with the wider public, but also allows for the inclusion of all the Greenhouse Gases which are contributing to Climate Change to varying degrees. This total CO₂ equivalent could be reported separately to the CO₂ target so as not to cloud the actual CO₂ numbers but retain this simplicity in communication which we think is essential in driving forward action on the targets and engaging the public.

To achieve real sustainable change, we must ensure that councils are properly resourced to meet the set targets, that targets are set realistically (i.e. if certain types of emissions are outwith a local authorities' control this needs to be taken into account when apportioning their contribution to any Scottish target), and that they should not exclude aviation and shipping as has been the case with previous emissions targets.

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?

COSLA agrees that the Bill should contain provisions to alter which gases are included to reflect any changes in the reliability of data and for improvements in scientific knowledge, provided these changes are based on research from trusted and recognisable sources and backed up by international agreement.

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?

In an ideal world COSLA would like to see targets based on end user inventories, as this will account for energy efficiency measures, renewable energy generation, as well as taking account of CO₂ caused elsewhere by our consumption here.

For practical reasons however we accept that this would prove highly complex. Thus, ultimately, any system will likely have to be based on source emissions. COSLA would accept a measure based on production accepting that where such an approach would disadvantage Scotland (i.e. the export of renewable energy), there are other areas where such an approach would provide a 'gain' for Scotland (i.e. the export of highly pollutive industrial processes to other countries).

While such a measure may not be ideal there is a need for easily accessible measures in order to provide the political steer to this process. In the short term, these may not be entirely rigorous but will provide a starting point from which to focus political will, something which is urgently needed. In the medium to long term fuller measures will of course need to

be developed, but we need a focal point for action in the short term and can not wait for these fuller measures to be developed.

Any system adopted needs to be based on scientific consensus and evidence based.

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, COSLA members acknowledge that the Bill has to be sufficiently flexible to adapt to international developments or unforeseen consequences.

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

COSLA submits that the emissions reduction target should not take account of the abatement effort made by companies under emissions trading schemes because such schemes do not contribute to an overall reduction in CO₂ in global terms – it merely shifts the problem elsewhere. Including ETS in the target could also mask the true picture of emissions reductions and make it look as if we are doing better than we actually are. The Scottish Government states in the proposed Bill that “what matters for climate change is global emissions, not just Scottish emissions, so this target should always be seen as a proxy for Scotland’s impact on global emissions”. Including ETS in the target would not comply with this statement.

COSLA recognises that such abatement schemes are useful in balancing environmental and economic concerns. However, as stated in our introduction, if climate change is truly a key priority for Scotland we need to show true leadership in the midst of other countries who are using such schemes to continue to pursue their economic growth goals at the cost of the environment. A joined up approach would acknowledge that we need to make tough decisions and recognise what we have stated above, that abatement schemes do not contribute to an overall reduction in CO₂ in global terms and thus are part of the problem, not part of the solution.

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

COSLA is largely against the use of these credits, but agree that if used, this should be limited and as a last resort. If international credits are to be used towards reduction targets they should be used as a “clean development mechanism” or “joint implementation credits” as verified by international processes supporting the Kyoto Protocol and would be in line with the international principle of “supplementarity” i.e. that the primary focus would be emissions from Scotland and that only a minor amount of emission reductions would come from international credits.

We would also suggest that permissions to use these credits be subject to scrutiny by the Committee on Climate Change (or other related Scottish body) to ascertain that the Scottish Government has done enough to stimulate domestic action and is not using international credits for ‘quick hits’ against emissions targets. We want to avoid a situation where companies and governments are prepared to pay in exchange for the right to do nothing to cut down on their own emissions.

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 2050 target to be changed through secondary legislation but only if independent, expert advice, reflecting international developments or unforeseen consequences of the Bill requires such changes. Such changes to the target should be limited to those based on scientific consensus and be evidence led in terms of what is needed to tackle climate change.

Members were keen to stress that any changes made are a reflection of what is needed rather than what is manageable.

SUPPORTING FRAMEWORK

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

Scientific assessment of emission levels that will keep the planet under the threshold of runaway and dangerous climate change (currently thought to be 2 degrees C above pre-industrial levels) should be the driver for setting budgets. Early reductions in carbon emissions must be prioritised above reductions in years to come – in order to reduce the cumulative build-up of carbon in the atmosphere.

In addition, COSLA agrees that the factors that should be taken into account when setting the level of budgets are: latest research and thinking (i.e. the Stern Report prepared by The Intergovernmental Commission on Climate Change in 2007); likely economic growth; likely population growth; technological progression; social impact; environmental impact; impact on economy and competitiveness of businesses; international circumstances; and scientific knowledge of climate change. We also recognise the impact of international aviation and shipping, and the difficulty in including them in a target and budget setting, but the Bill should at least begin to address these issues.

9. How long should interim budget periods be?

COSLA recognises the need to have human scale planning horizons and so agrees that phased reduction of CO₂ emission, to reach the 2050 target, will be essential to enable sectors to adjust their carbon budgeting accordingly to change processes, to re-invent and to modify inherent practices.

COSLA advocates four year carbon budget reporting periods timed to coincide with the last year of the term of a Scottish Government administration, such that each administration must report on their climate change record before seeking re-election. In this way reporting periods can use the inevitable political dimension to provide an additional driver for action on the part of each administration.

Setting carbon budget steps that tie in with the above will allow for short and medium term planning towards the 2050 target. The longer term achievement will rely on technological change and it is for the Scottish and UK Governments to drive this forward. Sectors will also be vulnerable to missing targets if external circumstances intervene. An example would be alternative energy sources failing to meet predicted output. However, while cyclical carbon budgeting set in secondary legislation is, in principle, a sound approach, the Government must ensure that the environmental, social and economic needs are in balance, and recognise through the implementation of this and other legislation that climate justice is a fundamental and increasing responsibility of Government.

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

COSLA members agree there should be at least three budget periods in statute at any one time. This will assist the planning of successive carbon budgets against circumstances.

The Government must show leadership by ensuring that targets are challenging but also realistic and achievable against current technological progress and other external factors that will influence the meeting of targets.

Emission budget periods should be set for a cycle appropriate in relation to our answer to number 9 above and for a long enough time period to permit investment in energy generation to be scheduled and financed in a manner acceptable to industry.

Major infrastructure projects are normally financed over 25 years. It would be useful to have certainty in terms of CO2/GHG targets over the same 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?

COSLA believes borrowing, if regulated and capped, can be useful, especially if cold weather or other unforeseen anomalies inhibit emissions reductions in a given year. However the focus must remain on a continued reduction in emissions and large levels of carry over may have the effect of peaks and troughs in the efforts to reduce emissions. In terms of banking however we would not place a limit as we want to incentivise early action on emissions reductions.

The UK draft Climate Change Bill suggests a 1% limit on banking and borrowing. In terms of borrowing COSLA sees this as a reasonable way to provide flexibility without jeopardising the ability to meet targets in subsequent budget periods as any amount borrowed reduces the allowance in the subsequent period. As stated above we would not be in favour of a limit on banking given the need to incentivise early action.

12. Should the Bill include an interim point target? If so, what year (or years) should it be for (2020, 2025, 2030, etc.)? How should the level be chosen?

The levels should be chosen with the advice of the UK Committee for Climate Change (or associated Scottish body) and be set, (as above in Response 9), for four year intervals, starting from the royal assent.

Interim milestone targets every four years would be useful to track progress against the long term target, consistent with a straight line progression to the 2050 target. Such a progression should take into account any technological advances that may be made in future and balance this with the benefit of early results. It does make sense to highlight the 2020 target specifically as an interim target as this is the target point for EU climate change reductions and the EU package of actions and policies will have a bearing on Scotland. It would also be a useful early marker with time to take corrective action should this target not be met.

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. If so, what and how often?

Scottish Ministers should collect data on issues that are set out (Forecast emissions; an assessment of the effectiveness (measured or projected) of current and/or planned policies; a measure of the energy efficiency of domestic and non-domestic buildings in the public and private sectors; the capacity of Scotland's renewable energy sector; emissions produced by the Scottish element of international aviation and shipping; and a measure of energy/ carbon

consumption in Scotland such as carbon footprint) – should be reported with other factors to establish a clear picture. Advice could be sought from the UK Committee on Climate Change (or other related Scottish body) as to how often these ‘other’ issues should be reported, but should fit in with target and budget setting framework.

COSLA sees a need for flexibility within secondary legislation to allow for changes to the bill should international consensus change quickly, i.e. there may be a need to re-visit the issue of aviation and shipping. Similarly such flexibility is needed to allow for a situation where local adaptation needs in terms of climate change may also change quickly. There should be a mechanism for central funding of adaptation measures outside normal budgeting arrangements to meet unforeseeable demands. This would mean looking at contingency funds for developments/events which cannot be adequately addressed through adaptation measures and thus will result in an unavoidable increase in cost.

As mentioned below Scottish Ministers should be expected to report on the progress of the upcoming Adaptation Strategy.

14. Is a process of Parliamentary scrutiny the appropriate way of holding the Scottish Government to account if targets or budgets are not met?

Targets should be the responsibility of the First Minister and these should be subject to publicly published scrutiny in addition to Parliamentary scrutiny. This could be done by an independent Scottish audit body, such as Audit Scotland.

This is because political accountability also needs to be backed up by public awareness raising to ensure that the public is fully behind the targets, and the measures to meet them. Political scrutiny will only have meaning if it has the weight of public opinion behind it.

15. What should be the primary source of advice to the Scottish Government for setting emissions targets or 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.

There is a wariness about inventing and paying for something new, actions are needed not more new bodies. At the same time any advisory body should be “arms length” from Scottish Government. Advice should closely follow that of the UK committee on climate change, but with a Scottish perspective where appropriate.

The primary source of advice to the Scottish Government should be the new UK Committee on Climate Change, with an evaluation of its effectiveness after 3 years. It is most appropriate to use this source as it comprises leading experts from all sectors and will provide a consistent approach throughout the UK, this will aid the sharing of best practice. Using existing public bodies might prove problematic as they may not have sufficient skills, knowledge and expertise, and there would be the issue of resourcing and pressure on already stretched NGOs. Creating a new public body is not supported.

That said, should the Scottish agenda develop to include areas of climate change mitigation or adaptation outwith the scope of that covered by the UK Climate Change Committee terms of reference, Scotland would then need a way to secure expert advice. Further discussion is needed on where such expert advice would come from.

COSLA would also stress that the UK Climate Change Committee would be looked to provide advice on the scientific information needed to set targets appropriately, independent of the political process, while how to go about achieving Scottish targets will be an issue to be decided within Scotland.

16. If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?

Presently there are a number of bodies with a role to play here but regrettably no one body at the moment has the concentrated expertise or capacity within to take on such responsibilities.

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?

COSLA agrees that the Scottish Government should utilise the UK Committee on Climate Change in the short-term and evaluate this within three years.

Whatever arrangement is decided upon there is of course a need for Scottish circumstances to be taken into account. If after the initial period of review a Scottish Committee on Climate Change is deemed appropriate, COSLA assumes this would take the form of an expert supported parliamentary committee with input from appropriate bodies such as the Sustainable Development Commission and SEPA among others.

18. If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?

See answer to question 16.

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)?

COSLA believes that robust Parliamentary scrutiny is the most appropriate approach, while recognising that the UK Climate Change Committee and any Scottish Climate Change Committee would have to be openly and actively involved in the parliamentary process. This process should be supported by a range of Scottish bodies such as Audit Scotland, and the SDC (with provisions for additional capacity for these bodies).

20. If so, which organisation is best placed to carry out this function and why? Options include a new Scottish Committee on Climate Change or an existing public body in Scotland?

See question 19.

21. If it were to be an existing Scottish public body, which public body is most suited to carrying out this task and why?

See question 19.

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?

The questions relating to the issue of appropriate organisations seem to be built around the assumption that the tasks required involve mainly monitoring and reporting. Does this (and the Bill) miss a major opportunity to provide leadership and direction to addressing the challenges faced?

COSLA supports the creation of a Scottish Steering Group on Climate Change (as outlined in the introduction) to provide this necessary leadership that will result in concrete action

towards the achievement of emissions targets and the promotion of clean technology research and development of markets.

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?

COSLA has no issue with the proposal to bring forward enabling powers so long as any duty imposed on the public sector to take specified actions on climate change or other specified environmental issues is backed up with the appropriate resources to enable those duties to be carried out and that reporting on any new duty be fully integrated into the Single Outcome Agreement process.

All 32 of Scotland's Local Authorities have signed up to Scotland's Climate Change Declaration, a voluntary agreement to work towards climate change mitigation and adaptation. This high level commitment is expected to be reflected in the new Single Outcome Agreements and in partnership with Community Planning Partnerships. Information gathered on work towards the declaration commitments is expected to provide valuable material to inform the SOA process and inclusion within this process will effectively roll out the principles within the declaration to the wider public sector as COSLA has recommended in the past. In time, with adequate resources provided through the local government settlement, more specific local indicators with regards to climate change work could and should be integrated into these agreements to see that they address more fully the range of climate change activity agreed by local authorities under the declaration.

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

Any duties with regards to Local Authorities would, in accordance with the Concordat, need to be developed jointly between COSLA and the Scottish Government. Any new duty would also need to be integrated into the Single Outcome Agreement process.

Some thought might be worthwhile around the objectives of a climate change duty being best achieved by strengthening and re-focusing the existing Best Value and Community Planning legislation, wherein local authorities are required to discharge their Best Value and Community Planning duties in "a way which contributes to the achievement of sustainable development". Achieving the objectives of a climate change duty through this approach would require improved, climate change-focused Best Value (and also Strategic Environmental Assessment) statutory guidance. This could be an iteration or extension of the Best Value and Sustainable Development Toolkit, which some local authorities are already using to inform performance management and improvement, and which has support from all key stakeholders.

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 measures? Why? Are there gaps in any existing guidance?

Any additional duties included in the Bill would need to be accompanied by guidance as well as resources to ensure local authorities and public bodies are able to deliver on these duties. However, as we are now operating under the Single Outcome Agreement arrangement such guidance must be developed with Local Government and should seek to be light touch and allow for local flexibility to determine the best way for duties to be discharged depending on local circumstances.

26. What should this guidance include?

Explanations of existing and available carbon management tools, examples of good practice and contact points for further information and assistance. It is difficult to answer this question fully however, until the detail of the Bill and its implications are known.

Any guidance should be developed jointly between the Scottish Government and COSLA, including Community Planning Partners, and be both fit for purpose and light touch as mentioned above.

27. Should the Bill contain enabling powers to create a requirement for certain public sector bodies (i.e. local authorities and large public 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?

Reporting on measures taken to address climate change by local authorities should be done through the Single Outcome Agreement process. If necessary, additional indicators could be developed to ensure that the most accurate, full and scientifically endorsed measures of progress are being used. COSLA would not in principle be opposed to a statutory reporting requirement as long as reporting was encompassed within these wider agreements – thus local authorities could be obliged to report on certain jointly agreed indicators, but not to report separately outside of their SOA.

COSLA would support a similar approach to Local Government as that suggested in our response to question 9.

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?

Current Best Value guidance could be amended to take specific account of climate change mitigation and adaptation, however, both the auditors and audited would require training for this. For example, how would mitigation and adaptation be measured? The requirement for this could vary between various organisations and local authority areas – how could this be accommodated?

Any amendments would need to be made jointly between COSLA and the Scottish Government and after consultation with member councils.

Councils need guidance as to how 'Best Value' can accommodate sustainable development, carbon reduction and cost efficiencies or budgets within councils.

There should be rationalisation of all the targets, indicators and policies relating to energy, carbon emissions, climate change, etc, to avoid duplication or confusion about where action and reporting are needed.

The need for carbon emission reduction should apply to public sector agencies and the link between councils and appropriate agencies should be via the Single Outcome Agreements and Community Planning Partnerships.

The Scottish Government must have a key role in determining how its public sector agencies adopt the same principles and practices as are expected of councils.

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?

The employment of variable charging by local authorities to incentivise actions or eliminate perverse incentives is a complex matter that would require further development and discussion at a national level.

Expansion of ROCs to include community-led biomass schemes?

There is a need for a joint discussion between COSLA and the Scottish Government looking at which areas need local discretion and where in reality such discretion would never be used without a national steer and leadership.

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?

COSLA agrees that as the Scottish Government is able to address such matters within devolved competence, there is no need to include direct measures on this matter in the Climate Change Bill as measures to address adaptation in Scotland will be primarily addressed through the Scottish Adaptation Strategy (consultation due in spring 2008).

However it may be advisable, within the Bill, to require the Scottish Government to develop and keep up to date such an adaptation strategy and to report against its progress and implementation to the Parliament.

There should be a duty to ensure that appropriate adaptation measures are being considered and rigorously assessed by all public bodies. This should include the full range of options from risk appraisal and major infrastructure investment to encouraging carbon offsetting schemes such as large scale tree planting, to promotion of "grey water" recycling. It is further suggested that regular reviews of likely impacts on flood risk/coastal erosion management are undertaken by relevant bodies.

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?

The Scottish Government SEA toolkit guidance could be strengthened and amended to provide clearer links on emission reductions. There needs to be greater scrutiny of what plans are and are not going through a SEA, there seems to be a lack of consistency at the moment.

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

Although the proposed Equalities Impact Assessment will identify all equalities implications during the final policy development stage of the Bill, consideration should be given to adverse effects caused from potential transport charging and the disabled, and 'green taxes' on fuel / car use and those on low income and incapacity benefits.

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 in society?

The Scottish Government should ensure that all its policies complement and aid appropriate action towards climate change and ensure that policies and strategies are not contradictory e.g. climate change with national planning, transport, waste and economic strategies.

In terms of waste management, there is an opportunity for government policy to make the link between sustainable waste management and sustainable energy. The Minister has recently announced changes to the National Waste Policy. These changes restrict the role of energy from waste, it also seeks to drive up the efficiency of any energy recovery system. In order to maximise such benefits it is imperative that such overlapping policies be driven forward in tandem and not in isolation.

Regulation and planning needs to be evaluated to ensure it is amenable to new technologies such as decentralised power generation/microgeneration. There is a planning issue about extension of the national grid to accommodate renewable energy production and encourage increased growth in the sector.

Another example is the case of business rates which are levied in Scotland on community based Combined Heat and Power (CHP) schemes. In England and Wales such schemes are exempt from Business Rates. Increasing the running costs of CHP schemes by applying these extra costs in Scotland is a disincentive to the wide spread development of CHP district heating as one way of reducing our greenhouse gas emissions.

Conclusion

This bill represents an opportunity for the Scotland to put in place a framework to enable the development of clear leadership on the climate change agenda.

Local Government in Scotland is keen to work with the Scottish Government, other public bodies, the voluntary sector and business and industry to ensure that together we produce a joined up policy direction that will enable us to meet the ambitious targets proposed.

The existing Concordat and Single Outcome Agreement Framework provide a useful vehicle for taking forward any joint initiatives under the bill and COSLA will continue to work in partnership with the Scottish Government to ensure we are addressing our shared national outcomes with relation to sustainability and climate change.

It is worth noting that Single Outcome Agreements are still in their infancy and that it will take time and further development to ensure that they adequately encompass a full range of climate change activity and issues.