

## UK Committee on Climate Change Call for Evidence on Scottish Climate Change Bill

### Response from Friends of the Earth Scotland

1st February 2017

#### Introduction

Friends of the Earth Scotland welcomes the opportunity to make this submission. We are part of the Friends of the Earth International network - the world's largest grassroots environmental network, uniting 74 national member groups, over 2 million members and 5,000 local activist groups around the world. FoE Scotland is an independent Scottish charity with a network of thousands of supporters, and 10 active local groups across Scotland. Friends of the Earth Scotland's vision is of a world where everyone can enjoy a healthy environment without exceeding their fair share of the planet's resources, now and in the future.

#### QUESTION PROFORMA

##### a. Appropriate level of future emissions (“targets”)

**Question 1:** To what extent is there scope to increase emission reductions now to meet a more ambitious 2020 target? (Please provide evidence where relevant.)

The SNP manifesto for the 2016 Scottish Parliament election promised a new Climate Change Bill, saying "we will bring forward a new Climate Change Bill to implement the Paris Climate Change Agreement and set an ambitious new target for Scotland to reduce emissions by more than 50 per cent by 2020" and "we will ... strengthen our ambition further and set a new target to reduce emissions by more than 50 per cent by 2020." The current Programme for Government repeats this commitment. It is proposed to adopt a new accounting system under the new Climate Change Bill, which will mean we will see full credit for actions in the energy sector, including a drop of nearly 10 million tonnes of carbon dioxide per annum resulting from the closure of Longannet power station in March 2016. This is equivalent to about 20% of Scotland's current emissions.

UKCCC figures show that the 2020 target would need to be around 56% (in the new accounting system) to be broadly equivalent to the 42% target set in the 2009 Act (under the current accounting system).<sup>1</sup> So the Scottish Government commitment to "more than 50%" would need to become a 56% target by 2020 just to represent the same level of ambition as the 2009 Climate Change (Scotland) Act. Thus, to deliver on the promise of "strengthening our ambition" the 2020 target needs to be more than 56%.

<sup>1</sup> <https://www.theccc.org.uk/wp-content/uploads/2016/03/Scottish-Emissions-Targets-2028-2032.pdf>

Clearly 2020 is not far away. The new Climate Change Act will not be passed by the Scottish Parliament until the autumn of 2018 at the earliest,<sup>2</sup> by which time the Scottish budget for 2018-19 will be already half spent. Thus, before the Act is passed, the Scottish Government will need to anticipate the more ambitious targets therein in implementing strengthened policies and setting budget allocations.

Because of the proximity in time of 2020, the 2025 and 2030 targets are probably more important in focusing minds on climate action in Scotland. This action will likely be brought together in the creation of the next Climate Change Plan (RPP4), work on which needs to start as soon as the new Act is passed.

The UKCCC have already recommended policies for Scotland which are not included or are weaker in the just-published Climate Change Plan, so there is clearly room for increased delivery, especially in transport, agriculture and buildings to meet future targets.<sup>3</sup>

**Question 2:** To what extent do you support further interim targets between 2020 and 2050 (e.g. for 2030 and 2040)?

In the 2009 Act the 2020 and 2050 targets were expressed as percentages and the annual targets as absolute emissions. Changes in baseline figures mean that these sets of targets went out of synchronisation. The 2020 and 2050 targets were also clearly conceptually different from the annual targets and more important in the public reporting of progress on reducing emissions.

If the new Bill proposes that interim targets and annual targets are set on the *same* basis, be that as percentages or absolute emissions, then the 2030 target has no greater real world significance than the 2029 target, other than extra reporting requirements. However, interim targets have an iconic status which help concentrate the minds of politicians and the public, and so are valuable. In this regard, interim targets for 2025, 2030, 2035, 2040 and 2045 would be useful. It is an ambitious 2025 target which would stimulate early action so setting the first interim target as far away as 2030 would weaken this incentive.

**Question 3:** What are the opportunities to reduce emissions to 2050 that go beyond our High Ambition scenario, including opportunities for greenhouse gas removal? (Please provide evidence where relevant.)

The Climate Change (Scotland) Act 2009 requires Scotland's emissions to reduce by at least 3% every year from 2020. The following table and graph show that the highest-emissions sectors - transport, agriculture and industry - have been and, in the draft Climate Change Plan, are proposed to continue to be, the sectors which make the least fair contribution to these percentage reductions. It is no coincidence that these are politically 'difficult' sectors. It is in these high-emission sectors that further reductions should be sought.

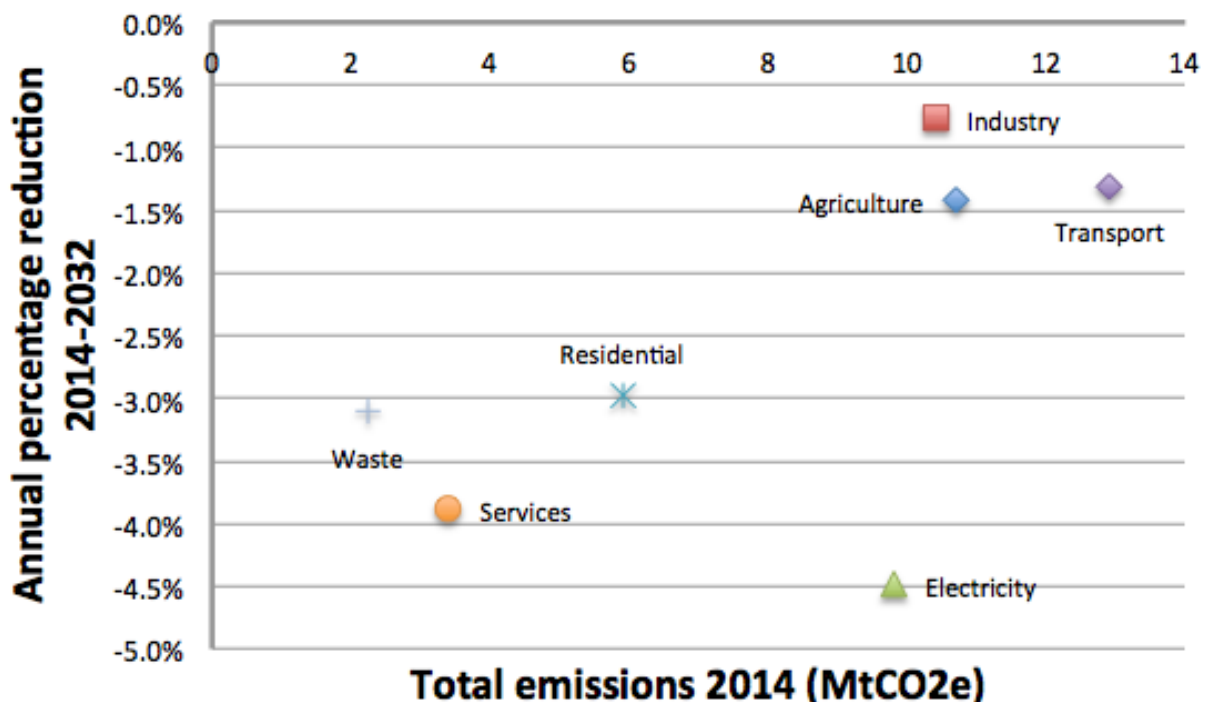
<sup>2</sup> The UKCCC's consultation document suggests 2019 but discussions with civil servants suggest this is too pessimistic.

<sup>3</sup> UKCCC 5th annual progress report for Scotland - <https://www.theccc.org.uk/publication/reducing-emissions-in-scotland-2016-progress-report/>

Sector	2014 emissions	Annual ave change 1990-2014	Annual ave change 2014-2032
Transport	12.9	-0.1%	-1.3%
Agriculture	10.7	-1.0%	-1.4%
Industry	10.4	-2.0%	-0.8%
Electricity	9.8	-1.3%	-4.5%
Residential	5.9	-1.0%	-3.0%
Services	3.4	0.5%	-3.9%
Waste	2.2	-3.1%	-3.1%

*Achieved and predicted annual reductions by sector, highest-emissions sectors first; figures in red are less than the 3% overall target required across all sectors*

### Predicted annual sectoral reductions 2014-2032 vs total emissions



The Climate Change Plan lays out policies towards 2032 but in transport it relies heavily on technological change, leaving room for greater emissions reductions by implementing the additional policies that the UKCCC has already recommended, including greater modal shift through investment in public transport and active travel and more rapid market shift to electric vehicles; in agriculture, voluntary measures, such as nutrient management, should become compulsory.

#### Question 4: Should the 2050 target be more ambitious than the existing level of 'at least 80%'?

The 'at least 80%' target was set with 2008 advice aimed at a reasonable chance of staying below 2°C.<sup>4</sup> Keeping this level of target would be wholly inconsistent with the letter and spirit of the Paris Agreement and would not deliver on the SNP commitment to "bring forward a new Climate Change Bill to implement the Paris Climate Change Agreement" and would particularly fall short of delivering on the First Minister's commitment at the Arctic Council Assembly in Reykjavik last October: "Scotland may not geographically be part of the Arctic Circle, but like every delegate here today we are committed to acting on climate change and limiting global temperature increases to below 1.5 degrees."<sup>5</sup>

The TIMES model which is being used by the Scottish Government to develop the Climate Change Plan is good for short-term predictions but cannot accurately predict what technological solutions we will be using or societal habits we will have developed by 2050, so the targets for later years should be set on the basis of the needs of climate science and international political agreements rather than on the basis of what modelling says might be possible.

A 'Fair Shares' approach looks at the historical responsibility of countries for causing climate change and the capacity of countries to implement policies to reduce emissions, with some chance of meeting the 1.5°C temperature limit. It therefore inevitably concludes that industrialised nations should do more than countries which have only recently industrialised. This approach was used in the civil society 'Fair Shares' report, supported by Christian Aid, Friends of the Earth, Oxfam, and WWF, to assess the pledges from countries in the run up to the 2015 Paris climate conference. The report concluded that the EU as a whole was offering cuts which are less than a quarter of what is needed.<sup>6</sup> This type of analysis suggests the UK should be aiming for reductions of between 65% and 75% by 2025 and 76% and 86% by 2030.<sup>7</sup> These reductions are shown for Scotland on the graph below. Extrapolating these figures reaches zero emissions between approximately 2036 and 2041. As the UKCCC's report on the Paris Agreement shows global CO<sub>2</sub> emissions would need to fall to zero in the 2040s for the world to stay close to the 1.5°C temperature limit.<sup>8</sup> We support a 100% target for around 2040.

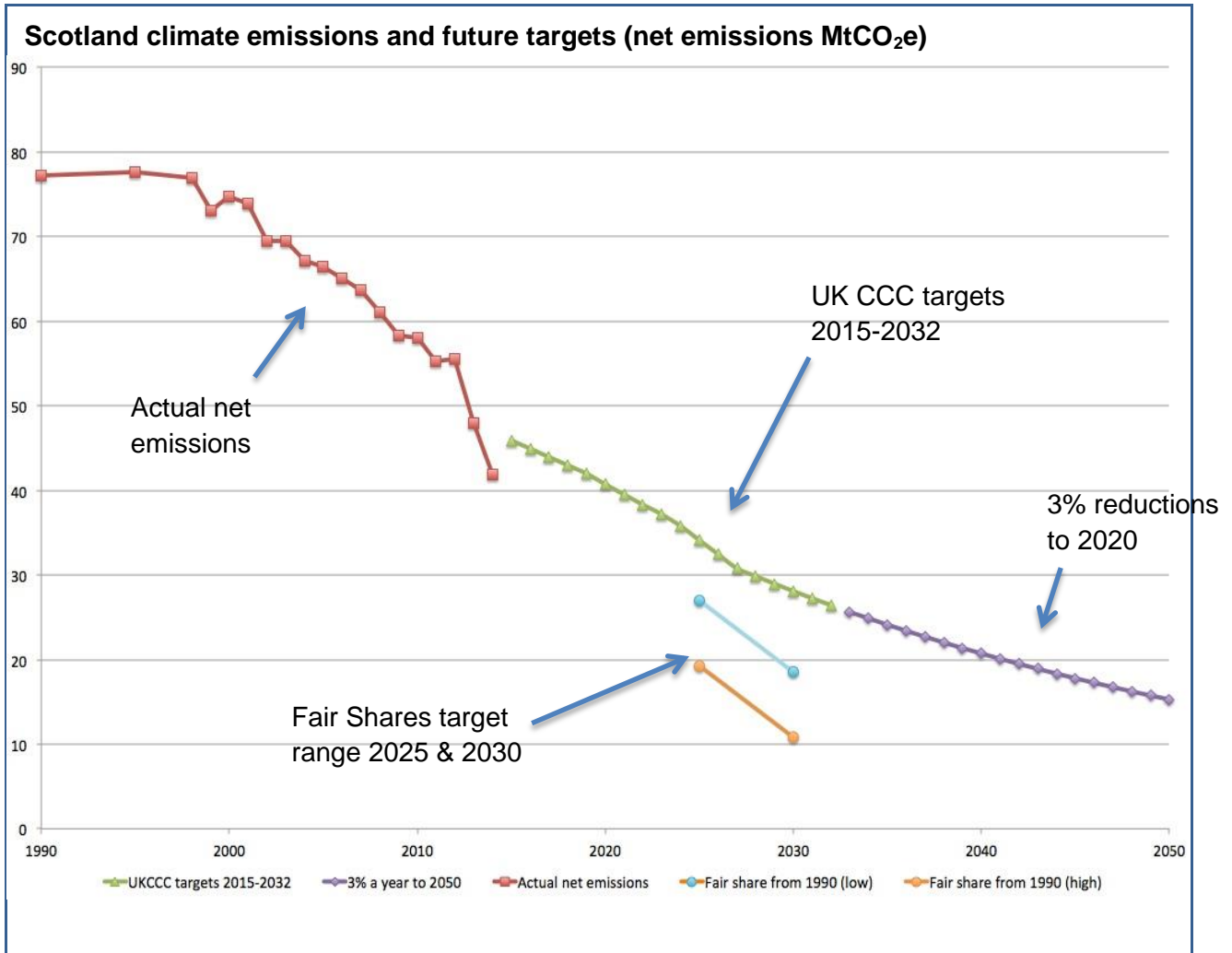
<sup>4</sup> <http://archive.theccc.org.uk/archive/pdf/TSO-ClimateChange.pdf>

<sup>5</sup> <https://www.holyrood.com/articles/news/nicola-sturgeon-announces-£1m-funding-help-developing-countries-react-climate-change>

<sup>6</sup> Fair Shares: A civil society equity review of INDCs - <http://policy-practice.oxfam.org.uk/publications/fair-shares-a-civil-society-equity-review-of-indcs-579848> and subsequent report <http://civilsocietyreview.org/wp-content/uploads/2016/11/Setting-the-Path-Toward-1.5C.pdf>

<sup>7</sup> <http://www.climatefairshares.org> and <https://www.foe.co.uk/sites/default/files/downloads/uks-fair-share-emissions-cuts-76425.pdf>.

<sup>8</sup> <https://www.theccc.org.uk/wp-content/uploads/2016/10/UK-climate-action-following-the-Paris-Agreement-Committee-on-Climate-Change-October-2016.pdf>



**Question 5:** Should there be a target for net-zero emissions for Scotland, and if so for when and on what basis?

See answer to question 4 for timescales.

Scotland should be very cautious about what technologies or techniques might be allowed to contribute to negative emissions and every effort should be made to reduce direct emissions before planning to rely on, often unproven, negative emissions technologies.

**Question 6:** If it is not currently appropriate to set a target for net-zero and/or to adopt a more ambitious 2050 target, should provision be made within the new Bill to do so at a later date?

Long-term targets should be set in the new Bill as they were in the 2009 Act. These are essential to make sure sufficient urgency is given to early action in areas like infrastructure where investment in the near term can shape the emissions trajectory for decades.

See answer to question 4 on ambition for 2050 and earlier.

**b. Duration and form of future carbon targets (one year or multi-year, absolute or percentage)**

**Question 7:** Should Scottish targets be set on an annual basis or covering multiple years? If on an annual basis, what can be done to minimise the impact of confounding short-term factors (e.g. weather) on meeting them?

We have witnessed the very positive impact of annual targets on the development and strengthening of emissions reduction policies. Multi-year budgets almost automatically impose the pain of failure on the *next* government rather than the present one. Annual targets should be retained and the 'at least 3%' a year requirement should be retained and strengthened to avoid short term dips in effort.

We support the idea proposed by others that the report on emissions for a given year should be adjusted for changes in the baseline and exceptional weather so that a fair comparison is possible with the targets. The UKCCC has provided this information some time after the emissions figures are released but the new Bill could require this adjustment to be made at the time of the annual results becoming available.

Reporting would of course also have to include the actual as well as the adjusted figures.

**Question 8:** Should targets be set on percentage or absolute terms?

Currently progress is reported in both absolute terms and as percentages, and annual targets are expressed as the former while the 2020 and 2050 targets are expressed as the latter. Whether percentages or absolute terms are selected the annual targets and interim targets should be set in the same system.

Clearly it is the absolute quantity of greenhouse gases that is the important thing for the atmosphere. However, the public understand percentages and have very little idea about MtCO<sub>2</sub>e, so targets will no doubt be expressed as percentages in public communications, whether this is the official system or not.

On balance we think all the targets should be expressed as percentage reductions from 1990 levels, with the absolute figures also noted when results are reported.

**Question 9:** What else can be done to make targets resilient to future revisions to the emissions inventory?

See answer to question 7 on reporting adjusted result.

Inventories will inevitably change, the Scottish Government, the UKCCC and civil society all have a role in communicating the reasons and the consequences of these changes.

### **c. Future accounting framework**

**Question 10:** What is the role for credit purchase to supplement action to meet gross targets?

The facility for limited purchase of credits in the 2009 Act has never been used. We think that all efforts to reduce emissions should focus on domestic action and no purchase of credits should be allowed.

**Question 11:** How should the role of the EU ETS, or other trading schemes, be reflected in the emissions accounting framework used for reporting progress to targets?

We agree that the targets and annual results should be set and reported in gross emissions units, however for comparison with international data and with our own emissions history, the ETS-adjusted figures should continue to be reported in parallel.

### **d. Criteria for setting future targets**

**Question 13:** Are the current target setting criteria listed in the Act still appropriate? Are any missing?

The target setting criteria are quite comprehensive but we support the proposal from others that human health is added as a criterion, to help decision-makers realise the benefits of action on, for example, active travel or fuel poverty.

### **For further information contact**

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