

**UK Committee on Climate Change  
Call for Evidence: Scottish Climate Change Bill**

**Response from Stop Climate Chaos Scotland**  
February 2017

**QUESTION PROFORMA**

**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.)

ANSWER:

SCCS recommends that future emissions setting and reporting is based on gross emissions and as such the current 42% target for 2020 is equivalent to 56% under gross emissions. Anything less ambitious than 56% would be an inadequate step on the way to later targets.

There is scope to increase emission reductions to meet a more ambitious 2020 target however with a new Climate Act and targets likely to come into force in 2018, after this there will be little time to achieve action to meet stronger targets. We will be keen to influence a new climate change plan (RPP4) once the new targets have been set.

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

ANSWER:

SCCS supports 2030 and 2040 interim targets as key milestones to focus attention and effort between 2020 and 2050. However, to avoid confusion we recommend that annual targets and interim targets are set on the same basis, e.g. both absolute, rather than a mixture. This difference in basis for setting annual and interim targets has in the past caused communication problems.

**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.)

ANSWER:

Between 1990 and 2014 Scotland has seen a wide range of emission reduction levels from its varied sectors of the economy<sup>1</sup>. For example the energy supply and waste sectors have done well with ghg reductions of 39% and 77%, respectively. Whereas, public sector buildings and transport have remained virtually static.

The Scottish Government's Climate Change Plan also shows a large disparity in what is expected of sectors in terms of ghg savings between 2017 and 2032. For example, the agriculture and transport sectors are not expected to find the same amount of savings as others. SCCS believes that this reflects a lack of transformatory policies for these sectors in the Climate Change Plan.

As an example, in these two sectors there is good scope to up the ambition from the UKCCC Higher Ambition scenario. SCCS believes that the following examples of policies can support emission reductions to 2050:

#### Transport

- Phasing out fossil fuel vehicles
- Lower speed limits
- Greater investment in active travel and in bus and rail infrastructure
- Workplace car park charging.

#### Agriculture

- Nitrogen budget for Scotland with targets to reduce nitrogen fertilizer.
- Agro-forestry targets
- Support for organic farming
- Payments to landowner for carbon sequestration and other ecosystem services

Peatland restoration has been included in the Climate Change Plan, with a target to restore 250,000ha by 2030. With a total of 600,000 hectares of peatland in Scotland damaged and emitting carbon there is a good opportunity past 2030 to continue or even increase the rate of restoration. Based on an average of 4.5t CO<sub>2</sub>e lost to the atmosphere per damaged hectare per year, restoring 600,000ha could prevent 2.7MtCO<sub>2</sub>e of emissions, permanently<sup>2</sup>. In addition, after 5-10 years the restored bog is likely to return to a state of sequestration, removing 1-2t CO<sub>2</sub>e per hectare per year from the atmosphere. This sequestration benefit, like tree planting could help Scotland to balance its emissions and contribute to a state of negative emissions.

<sup>1</sup> <http://www.gov.scot/Publications/2016/06/2307/329343>

<sup>2</sup> IUCN Peatland Programme figures

**Question 4:** Should the 2050 target be more ambitious than the existing level of ‘at least 80%’?

ANSWER:

SCCS believes that the 2050 target must be reset and be more ambitious than the existing level of ‘at least 80%’. The existing 2009 Act was designed to contribute to a global path aimed at keeping global average temperature to around 2°C. However, the Paris Agreement has committed parties to limit warming to “*well below 2°C above pre-industrial levels*” and to “*pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels*”, that would ‘*Significantly reduce the risks and impacts of climate change*’. Therefore a new 2050 target must be more ambitious than an 80% reduction in order to reflect the ambition of the Paris Agreement.

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

ANSWER:

We recognise the need to set a target for net-zero emissions for Scotland. Without advice specific to Scotland on this matter or on contributing to the Aim of the Paris Agreement our recommendation is based on interpretation of CCC advice to the UK.

The UKCCC gave advice to the UK Government recommending a net-zero CO<sub>2</sub> target by the 2040s and net zero GHGs by 2060-80s<sup>3</sup>. The CCC also said that globally we have to achieve net-zero CO<sub>2</sub> 10-20yrs earlier than the aim for 2C. The Paris Agreement also incorporates a goal of emissions neutrality or “balance” between emissions sources and removals by “second half of this century, on the basis of equity...<sup>4</sup>. This implies that Scotland and other developed country parties will have to go significantly further than the ‘at least 80%’ goal by 2050, which was always envisaged as the minimum level of effort required under the 2009 Act.

Scotland has a ghg emissions target and not a CO<sub>2</sub> target, and in the absence of advice specific to Scotland, **SCCS recommends setting a net-zero target for ghg emissions by 2050.**

Scotland has the opportunity to remain as a world leader in ghg reduction targets and in meeting those

<sup>3</sup> <https://www.theccc.org.uk/publication/uk-action-following-paris/>

<sup>4</sup> <http://unfccc.int/resource/docs/2015/cop21/eng/l09r01.pdf>

targets. It has the opportunity to be one of the first countries to set an ambitious net-zero emissions target.

We believe that this level of ambition is consistent with the advice to the UK Government on UK targets. It reflects the increased ambition needed to meet an aim of 1.5C. However, SCCS may review and change this recommendation regarding the date at which to set a net-zero target when further advice is published, for example, the forthcoming 2018 IPCC report on 1.5 degrees and further UKCCC advice.

**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?

ANSWER:

We believe our recommended net-zero target by 2050 should be included in the Bill.

**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?

ANSWER:

SCCS wants to see a continuation of targets set in Scotland on an annual basis. Up till now this has kept the Government of the time to account year on year.

To minimise the impact of short-term factors Government should set policies designed to exceed the annual targets in order to give leeway for such factors as a cold winter. Another way to minimise the impact of short term factors on communicating progress is to adopt reporting based on an adjusted figure – see our answer to question 8 below.

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

**ANSWER:**

SCCS recognises that targets set on absolute terms, properly reflects the quantity of emissions put into the atmosphere. However we recognise the advantage of targets set on a percentage basis. They are easier for the public to understand. Also, as science improves our knowledge of emissions from human activity it will lead to the need for inventory changes as it has in the past. The result of inventory changes in the past has led to an increase in the baseline year emissions and has made the achievement of absolute targets more difficult. This also makes communicating and reporting more difficult. We recognise that setting targets on a percentage basis facilitates the inclusion of inventory changes.

To facilitate and speed the inclusion of inventory changes at the earliest opportunity and to ease public understanding of annual reporting, we recognise two options in setting and reporting targets:

- Set on percentage terms
- Set on absolute terms but with reporting using an adjusted figure

Reporting using an adjusted figure which reports the underlying trend would need to be developed but the advantage would be to ease communication of the progress to meeting targets, removes variance from annual weather related changes, and remove changes based on inventory changes. Such a reporting system would show the impact of policy effort rather than these being obscured by an inventory change or for example by the effects of a cold winter.

However, **SCCS has not yet come to a collective view across the coalition about the best way forward on the basis for setting targets for the new Bill.** We cannot, therefore, at this time recommend either of the above options over the other. We will develop our thinking ahead of the draft Climate Bill being published by the Scottish Government.

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

**ANSWER:**

Our answer above shows that either percentage based targets or adjusted absolute targets can make targets resilient to inventory revisions.

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

ANSWER:

Credit purchase has not been used in the past under the 2009 Act. We recommend that credit purchase is not allowed for in the new Act because we believe that all efforts should be taken to reduce emissions through domestic effort.

**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?

ANSWER:

SCCS recommends that Scotland moves to reporting gross emissions, which does not adjust for the EU ETS. However, we recommend that in its reporting Government continues to give information on Scotland's share of ETS for purposes of comparison with other countries and Scotland's previous targets.

**Question 12:** Are there any competitiveness implications for current traded sector business (e.g. industry) to moving to gross targets in Scotland, and if so how could they be minimised?

ANSWER:

SCCS is not answering this question.

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

ANSWER:

SCCS considers all the above criteria remain appropriate. We would, however, like to see the inclusion of a criteria assessing the impact on health. This is particularly important as a number of climate change policies can improve both physical and mental health, for example those promoting active travel, reducing fuel poverty and improving access to natural habitats.

SCCS also seeks that criteria for setting future targets examine effects both in Scotland and overseas, i.e. what are the health effects of Scotland's contribution to climate change for people overseas.

**For more information, please contact:**

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Stop Climate Chaos Scotland is a civil society coalition campaigning for action on climate change. Members include environment and international development organisations, student unions and trade unions, community groups and faith groups. We represent a broad and diverse cross section of Scottish society.