



21 September 2017

Q1. Do you agree that the 2050 target should be made more ambitious by increasing it to 90% greenhouse gas emission reduction from baseline levels?

The Climate Change Bill should set a target for Scotland to reach net-zero greenhouse gas emissions by 2040.

Scotland is committed to achieving the goals of the Paris Agreement and this new Climate Change Bill must enable us to make material progress on limiting global temperature increase to 1.5°C by the end of this century. Other countries have already set net-zero targets before the year 2050, including Norway and Sweden. The Scottish Government has an opportunity to continue to demonstrate its leadership in responding to climate change by being one of the early adopters of a net-zero target.

The Government's proposed 90% reduction by 2050 target represents a slowing down of the emission reductions rate achieved over the past decade. Chart 1 demonstrates that continuing emissions reductions in Scotland at the average rate for the previous decade would lead to zero emissions in 2039. This analysis even ignores the significant reductions in the GHG account for 2016 as a result of Longannet's closure which would be expected to steepen the line further still.

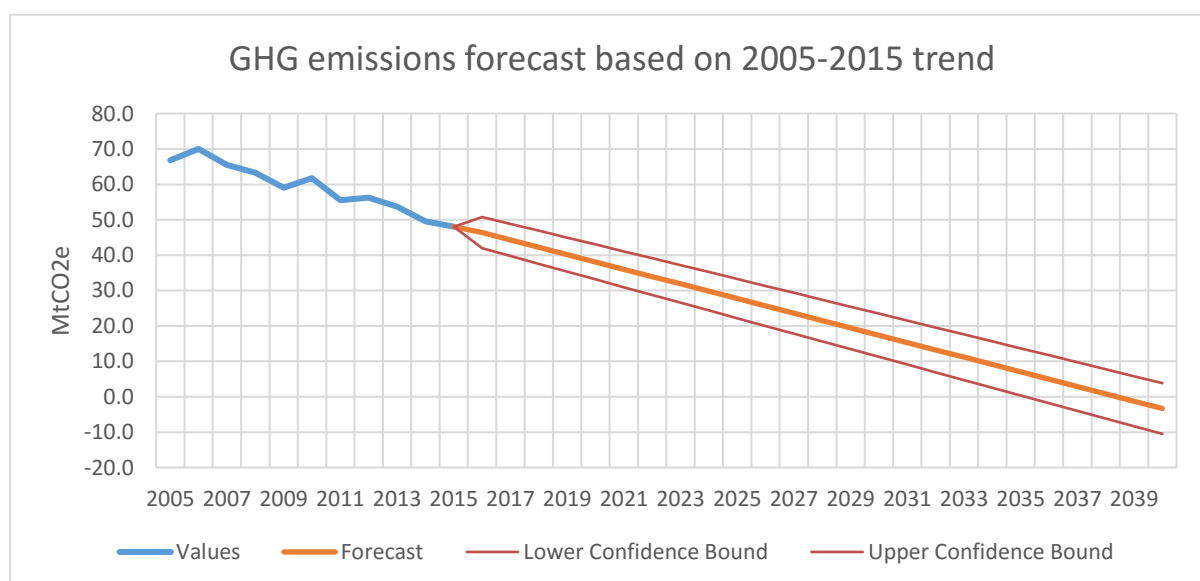


Chart 1: Scottish GHG emission data (2005-2015) is used to calculate a forecast to 2040. Data source: Scottish Greenhouse Gas Emissions, 2015, Scottish Government; confidence interval 95%.

This chart is a straight line forecast. The actual emissions reduction path Scotland should aim to achieve must include early action to reduce our cumulative emissions. Leading climate scientists, including Johan Rockström of the Stockholm Resilience Centre, recommends following a 'carbon law' approach where countries halve emissions every decade to limit global temperature rise to less than 2°C (Rockström et al, 2017). With this approach, Scotland would stay within a fair and safe carbon

budget where our share of the global emissions budget is in line with the principle of common but differentiated responsibilities and respective capabilities (CDRRC).

Q2. Do you agree that the Climate Change Bill should contain provisions that allow for a net-zero greenhouse gas emission target to be set at a later date?

The Climate Change Bill should set a net-zero target for 2040 from the outset.

If the international community is to be successful in limiting global temperature rise to 1.5°C global greenhouse gas emissions must peak in 2020 (Mission 2020, 2017). Meeting this requires an immediate and major shift in policy across housing, transport, energy and land use; setting an ambitious target of net-zero by 2040 would drive the changes and innovation in infrastructure and behaviour that are needed.

Q3a) Do you agree that the 2020 target should be for greenhouse gas emissions to be at least 56% lower than baseline levels?

Baseline amendments and the new proposed accounting system mean that the effort required to meet the 42% target for 2020 set in the last climate Act is equivalent to 56% today. The government's proposal therefore represents a no-change position, i.e. level of emissions reduction in line with the current Act.

Given the short window between any new Act and revised 2020 target we recognise a significantly stronger target would not provide a meaningful statement of ambition. Setting an ambitious 2030 and interim targets is more important at this stage.

Following the 'Fair Shares' approach outlined by Friends of the Earth, Oxfam, WWF and others, Scotland should aim for between a 65-75% reduction in emissions by 2025. This reflects Scotland's history as an early industrialising country and our responsibility for cutting emissions faster due to our high past levels of fossil fuel use.

3b) Do you agree that a target should be set for greenhouse gas emissions to be at least 66% lower than baseline levels by 2030?

No, our 2030 target must go further and set for greenhouse gas emissions reductions to be between 76-86% of baseline levels as recommended by the Fair Shares approach. The next decade is the most critical for action on climate change and Scotland must make urgent reductions. A higher interim target sets us on course to reach net-zero emissions by 2040.

3c) Do you agree that a target should be set for greenhouse gas emissions to be at least 78% lower than baseline levels by 2040?

No, as previously stated Scotland should set a net-zero greenhouse gas emissions target by 2040.

Q4. Do you agree that annual emission reduction targets should be in the form of percentage reductions from baseline levels?

Yes, on balance we agree that annual targets should be set in the form of percentage reductions. However, absolute figures must also be included in annual reports to allow our progress to be compared to previous years and to allow a carbon budgeting approach to be taken.

Q5. Do you agree that annual targets should be set as a direct consequence of interim and 2050 targets?

Annual targets should be designed to meet the interim 2020 and 2030 targets, with an end target of net-zero by 2040 but should not necessarily be set in a straight line. There should be a drive for large-scale actions to be taken in the earliest years to reduce emissions.

Q6. Do you agree that all emission reduction targets should be set on the basis of actual emissions, removing the accounting adjustment for the EU ETS?

Yes, on balance we support setting emission reduction targets on the basis of actual territorial emissions.

Figures presented in this way are easier to communicate. However, annual reports should still include EU ETS-adjusted figures to allow comparison with past reports and bench-marking against other EU countries.

Q7a) What are your views on allowing the interim and 2050 emission reduction targets to be updated, with due regard to advice from the CCC, through secondary legislation?

We disagree with the proposal that interim and final targets are set through secondary legislation. Setting these targets in primary legislation ensures a commitment to taking immediate and large-scale action across multiple policy areas. It ensures the Government is held to account to meet these targets and prevents them from being weakened at a later date.

7b) What do you think are the most important criteria to be considered when setting or updating emission reduction targets?

The criteria of “not exceeding the fair and safe Scottish emissions budget” is a vital criterion. While we agreed that, on balance, the targets should be expressed as percentage reductions, the setting of targets must take a carbon budgeting approach, i.e. consider cumulative emissions as suggested by the Stop Climate Chaos Scotland coalition.

Targets should be set using the best available science and an assessment of historical responsibility for carbon emissions, for example through the common but differentiated responsibilities and respective capabilities (CDRC) principle.

Q8a) What are your views on the frequency of future Climate Change Plans?

The current cycle of five years is appropriate.

8b) What are your views on the length of time that future Climate Change Plans should cover?

The current timespan of 16 years is appropriate for detailed plans. However, a higher level plan may be useful to identify and address strategic issues.

8c) What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?

Scotland should continue to focus on delivering ambitious domestic action. Alignment with the Paris Stocktake should not be the primary driver of Carbon Plan timing.

8d) How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?

We strongly favour extending the 60-day scrutiny period for future draft Climate Change Plans. This allows committees more time to consider the impact of complex, cross-sectoral policies and call in relevant experts. Parliamentary committee have made the same recommendations with Rural Economy and Connectivity considering a 120-day period more appropriate.

The final plan should be published no later than nine months after the published draft and detail how it has responded to each recommendation made by the Parliament's committees.

Q9. What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans?

Shortfalls should be made up as soon as possible so that Scotland's overall carbon budget is met and the requirement under Section 36 of the Climate Change (Scotland) Act 2009 to lay a report before Parliament setting out proposals and policies to compensate for any excess emissions, should be retained.

10. What are your views on these initial considerations of the impacts of the Bill proposals on Scotland's people, both now and in future generations?

The Bill will bring significant benefits to Scotland's people by incentivising action to create warm homes, reduce air pollution, improve public transport, enhance greenspace and grow healthy food. Avoiding catastrophic climate change is essential to preserving the climatic stability in which humanity has evolved and on which future prosperity depends.

11. What are your views on the opportunities and challenges that the Bill proposals could have for businesses?

Scotland is well placed to make use of opportunities in the low carbon economy through renewables, decommissioning, food and drink, housing and retrofitting and many others.

Scottish Government modelling estimates that meeting its proposed 2050 target would cost equivalent to just under 3% of cumulative Scottish GDP. Stern Review estimated that failing to act on climate change would be equivalent to permanently losing nearly 11% of global per capita consumption – with an upper estimate of 20%. While these are not completely equivalent analyses the point is clear – we know that inaction on climate change will cost more than action.

12a) What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process? (Please give details of additional relevant sources). b) What are

your views on the predicted environmental effects as set out in the Environmental Report? c) Are there any other environmental effects that have not been considered? d) Do you agree with the conclusions and recommendations set out in the Environmental Report? e) Please provide any other comments you have on the Environmental Report.

13. Please use this space to tell us any other thoughts you have about the proposed Climate Change Bill not covered in your earlier answers.

The proposed Bill sets GHG emission reduction targets, but it should also consider other key targets, such as the phasing out of petrol and diesel vehicles by 2030, which could help drive action.

The Scottish Government have already committed to meeting 50% of total energy demand by renewables by 2030 through its energy strategy. We believe this is a key target that should form part of the Climate Act.

Committing to statutory targets to set a nitrogen budget for Scotland, phase out the sale of new petrol and diesel vehicles by 2030, and for all homes to achieve a Band C Energy Performance Certificate by 2025 would make it clear that Scotland's action on climate change will match its ambition.

Scotland's future prosperity depends on serious planning for and investment in the low carbon economy. We know there is at least three times more fossil fuel in global reserves that could be exploited today than is compatible with even a chance of meeting 2C, and over 10 times more fossil fuel resource that could be exploited in future. To secure jobs for the future we need to concentrate on conserving oil stocks and building jobs in a clean economy. The Climate Bill should explore how to set a target which keeps fossil fuels in the ground in line with international responsibilities and future prosperity.

Finally, this consultation on the proposed Climate Change Bill sets Scotland's the ambition on climate change. Meeting them will require a continued transformation in our economy and society, with the opportunity to create thousands of jobs in transition. Some of the opportunities are described in our 2016 report [Jobs in Scotland's New Economy](#).

References

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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/wpcontent/uploads/2016/11/Setting-the-Path-Toward-1.5C.pdf>