



Stop Climate Chaos Scotland

Written evidence to the Rural Affairs, Climate Change and Environment Committee on the Draft Report on Proposals and Policies (RPP2)

“The Parliament and the Government have won plaudits for setting ambitious climate change targets. It is right to be ambitious, and that places a responsibility on us to live up to our ambitions and meet the targets.”

Nicola Sturgeon MSP, 7th November 2012

Introduction

Stop Climate Chaos Scotland (SCCS) welcomes the opportunity to provide evidence to the Rural Affairs, Climate Change and Environment Committee on the Draft Report on Proposals and Policies (RPP2). In the evidence below, SCCS sets out why **the current draft does not provide a credible plan** for fulfilling the requirements of the Climate Change (Scotland) Act 2009 and highlights those areas within the remit of the Committee which require the greatest attention.

The draft RPP2 has been published at a time of heightened awareness of the urgency with which we must tackle climate change. Recent reports from the World Bankⁱ, World Economic Forumⁱⁱ, International Energy Agencyⁱⁱⁱ and UNEP^{iv} have all highlighted how the high carbon emission trajectory we are currently pursuing will result in dangerous climate change. These authoritative accounts of the urgency for action are matched by record Arctic ice melt^v in 2012, the hottest decade on record for global temperatures^{vi}, and a growing body of evidence linking extreme weather events to climate change^{vii}.

Although Scotland has the strongest climate legislation in the world, it is not alone in rising to the challenge of tackling climate change. An assessment by Globe International showed that 32 out of 33 surveyed developed economies have progressed or are progressing significant climate and/or energy-related legislation^[8]. Christiana Figueres, the Executive Secretary of the UN Framework Convention on Climate Change (UNFCCC)^{viii} has emphasized the importance of national legislation, saying: “nothing is going to be agreed internationally until enough is legislated for domestically.” **It is therefore essential that Scotland has credible plans in place to deliver on its world-leading climate change legislation.**

In 2012, as the second RPP was being developed, SCCS set out three criteria^{ix} for the plan to provide the necessary confidence that future annual targets will be met: **credibility, transparency and ambition**. In this evidence, we have assessed the extent to which the draft RPP2 meets these criteria and then provided answers to the Committees questions relating to rural land use, resource use, behaviour change and governance.

Summary

- There is an overreliance on proposals over policies, as well as on the EU increasing its climate change target. Unless all proposals described are fully implemented and the EU changes its level of ambition, Scotland will meet just one annual target between now and 2027.
- There is a lack of transparency in order to inform independent assessment of these plans.
- Emissions abatement potential is unexplained and potentially overstated in some cases.
- There is a lack of monitoring of existing policies in order to assess whether emissions savings are being made at the level forecast in RPP1.
- Milestones should be included in the plans in order to facilitate future monitoring and evaluation of policies.
- There is a need to integrate a strategic approach to low carbon behaviour change in policies and proposals.

Transparency and readability of report

Rather than providing greater transparency of data, the **draft RPP2 provides less information than the first RPP**. It no longer distinguishes between UK, EU and Scottish policies as clearly as did previously, nor does it provide estimates of costs for proposals as the original report did. **This lack of information will frustrate future attempts to scrutinise the budget against the requirements of RPP**. In a number of cases, proposals are described in vague catch-all terms such as ‘Lower emissions potential in transport’, but no explanation is provided as to what this proposal would mean in practice. This has the effect of attributing significant carbon savings to poorly defined statements of possible future activities.

Unfortunately, the draft RPP2 does not provide a full account of the benefits to be secured from its delivery. Although there is a figure provided for financial benefits it does not account for benefits from, for example, improved air quality, a

healthier population or reduced congestion. As a result, it provides only a partial account of the balance of costs and benefits, an area highlighted as important by Audit Scotland in their report from December 2011^x.

In addition, unlike the first RPP, RPP2 also does not contain percentage reductions per sector compared to the 1990 baseline which makes it difficult to analyse the level of savings being attributed to meetings targets.

Credibility of plans

SCCS is concerned that **RPP2 does not present a credible package of measures** to enable emissions targets to be met. As with RPP1, there remains a significant overreliance on both the EU raising its ambition and the full implementation of a large number of proposals. For instance, in 2020, 41% of savings from the homes and communities sector is to come from proposals, for transport the figure is just over 30%. This balance of effort between committed policies and ‘propositions’ (para 2.11.2 of RPP2) does not provide a blueprint to a low carbon economy.

The table below is based on data from RPP2 and show how **only one target will be achieved if the Scottish Government implements only policies**. Even if the EU raises its ambition, all proposals would have to be implemented to the levels described if all of the legally-binding emissions targets are to be achieved.

EU shifts to 30%	Yes	Yes	No	No
All proposals implemented	Yes	No	Yes	No
All policies implemented	Yes	Yes	Yes	Yes
Outcome for annual targets 2013-2027	Hit all 15 targets	Hit seven targets (2013-19) and miss eight (2020-27)	Hit eight targets (2013, 2021-27) and miss seven (2014-20)	Hit only one target (2013)

Credibility is further undermined by a lack of detail regarding certain proposals that are expected to generate considerable savings beyond 2020. For instance, one transport ‘proposal’, Lower Emission Potential in Transport, does not start to contribute savings until 2025 and by 2027 is saving almost the same as the entire decarbonising vehicles agenda. The risk associated with reliance on possible future activity is compounded by the vague description of future action. The proposal simply refers to ‘a range of models used to predict transport emissions suggest that it may be possible to reduced predicted emissions, perhaps by as much as 0.75 Mt by 2027.’ There is no information to allow an informed interpretation of how likely this is or what steps need to be taken now to ensure it is realised.

RPP2 provides little evidence of the effectiveness of existing policies and as a result the Committee does not have the information needed to judge the credibility of emissions reductions attributed to different policies.

Ambition

It is hard to identify an increase in policy effort in RPP2. Certainly the ‘step change’ in effort advised by the UK CCC is not apparent. For instance, the transport sector plans to achieve only 64% of the savings RPP1 set out to make; an actual reduction in policy effort rather than an increase. This is reinforced by the absence of *any* Scottish Government transport policies. By its own definition any current Scottish Government transport effort with a focus on emissions reduction is not currently happening at a “the intensity required for the abatement figures in this document”. The low level of ambition is compounded by the reliance on action after 2020. Again, the transport sector provides a clear example with three times the emissions reductions expected between 2021 and 2027 as between 2013 and 2020.

Rural Land Use

Progress on RPP1: In agriculture, sectoral emissions reductions have been achieved since the 1990 baseline, but this is mostly due to drivers outwith RPP1 policies, i.e. reductions in livestock numbers, and reduced fertiliser use due to increased cost.

Some progress has been made on land use policies in RPP1, most notably in tree planting rates which, in 2011 were nearing the 10,000ha/yr target, and in agreeing the target up to 2022 with stakeholders. Progress in other areas is uncertain, often because monitoring is inadequate (as outlined in the Governance section below).

RPP2: The Rural Land Use section of RPP2 lacks credibility because **the policies and proposals affecting agriculture rely too heavily on voluntary uptake**. As a result, estimated abatement levels may not be realised unless considerable effort is put into promoting these measures. In addition, **too many proposals are scheduled to begin post-2020**. With long lag-

times often the norm in the natural environment, to take account of natural processes, action is needed now to see abatement contributing to the targets as soon as possible.

Changes from RPP1 to RPP2:

- When compared to RPP1, there is a reduction in the abatement ambition from policies in the land use sector. By 2027, the document predicts greater annual abatement from land use policies but this relies on abatement from a tree-planting target that has not been formalised past 2022.
- Peatland restoration is newly included in RPP2 as a policy, which is welcome, although this is a restatement of an existing commitment of £1.7m for restoration. In addition, a new RPP2 proposal suggests that a target of 21,000ha/yr of peatland restoration is 'technically feasible', but does not formalise this as a target. Realising this target could result in 362,000ha of restored peatlands and annual abatement of 0.5Mt CO₂e. **We recommend that the draft be revised to formalise the target of restoring a minimum of 21,000ha/yr.**
- There is a new proposal to achieve 90% uptake by farmers of Nitrogen Efficiency Measures and introduces the potential of new regulation to boost uptake. This is welcomed but SCCS is disappointed that the proposal does not include a date when this would be introduced if uptake is deemed insufficient. In order to encourage farmers to take up these measures now, to avoid regulation in future, **we recommend that a date and a regulatory trigger is set and publicised.**
- The first RPP proposal target of 15,000ha/yr tree planting has been dropped from RPP2. In its place is a new proposal to promote Scottish timber in construction. This is welcome as timber has lower embedded carbon than other construction materials and there is potential to source timber from sustainable sources in Scotland.
- Abatement estimates from Farming for a Better Climate (FFBC) have been downgraded from RPP1 which **shows a greater realism and is appropriate.** However, FFBC is not adequately monitored (para 9.4.5 of RPP2), both in terms of measure uptake or coverage across Scotland and therefore, we believe that attributing abatement or a progress statement to FFBC is, at best, guesswork.
- Anaerobic digestion has been dropped from RPP2 due to low uptake by farmers through the SRDP. The RPP1 proposal for mandatory climate measures through the Common Agriculture Policy (CAP) has also been deleted. While we recognise that the outcomes of CAP negotiations are uncertain, **we recommend that this proposal is reinstated into RPP2 to show that Scotland is committed to a future CAP subsidy compliance system which requires all farmers to adopt climate beneficial measures.**
- The proposals for developments in agricultural technology, and technical potential from low-carbon land use indicate large abatement levels by 2027. However these proposals and abatement estimates are opaque and lack credibility at this stage. **We recommend that these proposals are investigated by the Committee.**

Resource use

Progress on RPP1: Reductions in emissions from waste in RPP1 were attributed to existing and planned policies on zero waste: increasing recycling and composting rates and diverting waste from landfill. Two milestones were identified: i) agreeing and implementing measures to ban disposal of organic waste from landfill and requiring priority wastes to be sorted and collected separately; and ii) introducing landfill bans for food waste and recyclables by 2015 and all biodegradable waste by 2017. Good progress has been made on these zero waste policies, although the ban on landfill biodegradable material was delayed until 2020 and the ban on landfilling biodegradable material was limited to residual municipal waste. In addition, Scotland fell short of the zero waste plan target to recycle and compost 40% of Scotland's household waste by 2010 and the latest recycling figure of 40% (2011) suggests that Scotland is set to fall short of the 2013 target to achieve a recycling and composting target of 50%.

RPP1 did not include any proposals on waste although it identified that the Climate Change (Scotland) Act provides provisions for a **range of orders and regulations** including: Placing a duty on businesses and public bodies to prepare formal waste prevention and management plans; Requiring businesses and public bodies to provide recycling facilities; Setting binding targets for overall reductions in packaging; Requiring retailers to include a deposit as part of the price of products, to be refunded when packaging is returned for re-use; and Carrier bag charging. To date, it is **disappointing that none of these have been implemented.**

RPP2: We have a number of concerns about the waste component of RPP2:

- Emission reductions from the waste sector are heavily reliant on policies that existed pre-2010. The scale of ambition for any new policies is disappointing.
- The plan fails to put forward any concrete proposals (even where Scotland already has these powers) which would make a significant step change in both recycling rate and waste prevention e.g. residual waste charging or mandatory fortnightly collection for residual waste; a nationwide deposit return scheme; binding targets for the overall reduction in packaging; or mandatory waste prevention plans.

- RPP2 only identifies one additional waste proposal: additional methane recovery from landfill. Significant emissions savings are attributed to this although there is **considerable uncertainty and many variables** associated with how likely this is to be achieved.
- The abatement figures are based on an assumption that 'there is a general reduction in the amount of waste per person arising' however no specific details are given about what this assumption is and no specific policies or proposals are included that would deliver this. **SCCS recommends the Committee seek more information on this assumption.**
- The level of abatement in RPP2 attributed to 'zero waste policies (pre May 2010)' for each year 2013-2022 has been increased by between two and four times the abatement attributed to the same policy in RPP1 without a clear explanation to justify this. **SCCS recommends the Committee seek an explanation for this increase.**
- It is disappointing that the importance of the waste hierarchy, highlighted in the recommendations in the previous Committee Report on RPP1 have not been taken into account in the preparation of RPP2:
"The Committee recommends that in developing the RPP, and in advance of the next RPP, the Scottish Government should consider wider issues in relation to waste and incorporate proposals in relation to all aspects of the waste hierarchy and not just on the issue of waste treatment."^{xi}

Behaviour change

The section on behaviour change in RPP2 is welcome and represents a step forward from 'Low Carbon Scotland: Public Engagement Strategy'. We support the stress on three contexts - individual, social and material - as being essential to achieving change. However, there is a **lack of detail on how Government intends to address this agenda and integrate this strategic approach in its policies and proposals** across the different sectors. The *Low Carbon Scotland: Behaviours Framework* described in section 3.5.1 may address this, but it is unhelpful that this will not be published until the end of February 2013.

All proposals and policies dealing with the provision of funding, information and advice should have accompanying engagement strategies based on the latest behaviour change research. For example, the policy to install Smart Meters in every home by 2020 is directly linked to seeking a change in behaviour and a strategy on that behavioural change should be presented alongside that.

The Committee may wish to consider the identified importance of 'Consistency of message and of action' (para 3.5.12). There is a tension between Government's stated intention in this regard and continued promotion of carbon intensive activities such as road-building programmes and the oil and gas industry. This does not send a clear message on climate change action to the general public and may hamper efforts to encourage low carbon behaviours.

Governance

Progress on RPP1: SCCS is concerned about the **lack of detailed analysis and monitoring of existing policies** within RPP1. Indeed, the data provided in the Carbon Reduction Activity Report for 2010^{xii} is given only at sectoral level, with no further information about progress on specific policies within those sectors. In the absence of this quantitative data on policies which are already being delivered, it is not possible for "the Scottish Government [to] keep under review the progress being made in implementing these measures, and the extent to which these policies and proposals deliver the predicted abatement potential"^{xiii} as set out in the first RPP. This does not provide the transparency on progress made which was called for by Audit Scotland in its 2011 report^{xiv}.

RPP2: Unlike the first RPP, the **second draft RPP does not include the any milestones of progress** for the various sectors. This significantly weakens the document as it removes an important means of judging progress and adjusting implementation to ensure emissions targets are met.

There is a **need for much more rigorous assessment of delivery of existing policies** to be undertaken, to ensure that abatement potential is being realised or, where emissions savings are not being delivered to the level that was anticipated, that Ministers can "identify alternative or additional actions to compensate for the reduced abatement."^{xv} We are also concerned that issues raised by the TICC Committee in their scrutiny of RPP1 do not appear to have been addressed by Government in the second RPP^{xvi}.

About Stop Climate Chaos Scotland

Stop Climate Chaos Scotland (SCCS) is a diverse coalition of over 60 organisations campaigning together on climate change, including environment, faith and development organisations, trade and student unions and community groups. For more information visit www.stopclimatechaos.org/scotland.

References

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