



Stop Climate Chaos Scotland

Briefing for Parliament Debate on Draft Climate Change Plan
Thursday 16th March 2017

About Stop Climate Chaos Scotland

Stop Climate Chaos Scotland (SCCS) is a civil society coalition campaigning for action on climate change. Members include environment and international development organisations, trade and student unions, community groups and faith groups. We believe that the Scottish Government should take bold action to tackle climate change here at home and play its part in supporting climate justice around the world. We provided written evidence to each of the four committees scrutinising the draft Climate Change Plan and we are grateful for the opportunity to share the views of the coalition ahead of the debate in the chamber.

Summary

- SCCS welcomes the strong critique of the draft Climate Change Plan from cross party MSPs in four committees. Their conclusions, following scrutiny of the draft Plan, make it clear that the Plan must be improved considerably if Scotland is to realise the positive vision of a low carbon future which is cleaner, healthier and more prosperous.
- The final Plan must contain more challenging targets for transport and agriculture and ensure faster and stronger action on energy efficiency and heat. If left unchanged, this draft Plan will result in the worst performing sectors continuing to perform poorly while other sectors seek to realise unrealistically high ambitions.
 - Committees agreed with SCCS and rightly condemned inadequate transport policies and proposals. They raised serious questions about unconvincing and deeply pessimistic assumptions that there will be significant traffic growth and pressed for urgent action and funding to encourage more walking, cycling and public transport use.
 - Committees agreed with SCCS and others that the level of ambition in agriculture must be raised if we are to see the necessary emissions reductions and increased farm efficiency and profitability. The final Plan should avoid an over reliance on awareness raising and voluntary, rather than compulsory, measures to achieve that ambition.
 - Committee reports demonstrate cross party support for stronger and faster action on energy efficiency and heat in Scotland's homes. The final Plan must go further and faster in these areas to tackle fuel poverty and ensure energy security and emissions reductions.
- The draft Plan lacks transparency. Despite the welcome adoption of a whole energy system approach through the TIMES model, the Plan does not clearly establish how policies will result in emissions reductions in each sector, nor how overall targets will be met.
- The draft Plan lacks credibility in its current form as it does not contain sufficient new policy and is overly reliant on voluntary measures, technological change and the actions of the UK Government and EU to achieve its aims.
- There is little evidence of the application of behaviour change research in policies and proposals.
 - As the ECCLR committee states in their report *"...although behaviour change has been considered and included in the draft Plan, its application in policies and proposals is omitted or inconsistent [...] The Committee recommends the science of behaviour change be better reflected in the policies included in the final Climate Change Plan, including on the specific examples raised with this Committee on modal shift.*

Meeting the MATCH criteria

The MATCH criteria by which to judge the draft Plan were developed by WWF Scotland and adopted by SCCS. The criteria ask if the draft Plan is Measurable, Ambitious, Transparent, Credible and Holistic. As evidenced by the four committees' reports, it is clear that in its current form, the draft Climate Change Plan does not meet these criteria:

- **Measurable** – As the ECCLR Committee stated, *"...the Committee does not consider the suite of policies and proposals as currently presented are capable of SMART analysis and proposes that the*

Scottish Government include further specific and consistent information across all policies and proposals in the final Climate Change Plan and ensure there is clarity in the pathways to delivery.”

- **Ambitious** – The ECCLR Committee recommended that “...*the Scottish Government revise the carbon envelopes for transport and agriculture to show greater ambition.*”
- **Transparent**: As the Economy, Jobs and Fair Work Committee has said, “...*the Committee does not know exactly what information was incorporated into the model and what weight was given to practical considerations on delivery, costs and disruption. The Committee believes that this approach lacks transparency.*”
- **Credible** – The Local Government and Communities Committee said “...*the Committee believes that there is a risk that targets may not be met due to a lack of policy information in early years and a reliance on new technologies.*” This comment refers specifically to Policy Outcome 2 on low carbon heat in Scotland’s homes. However, SCCS is of the view that an over reliance on technological change and a lack of detail throughout the draft Plan undermine its credibility.
- **Holistic** – The draft Plan contains some useful assessments of the wider impacts of policies and proposals in each sector. Further assessment of financial and social impacts would strengthen the final Plan in this respect.

Electricity

- **Negative emissions through Carbon Capture and Storage (CCS)**: The anticipated role of CCS in achieving negative emissions in 2027 raises questions about the credibility of the draft Plan. The final Plan should not assume negative emissions but should instead set out policies and proposals to increase emissions reductions from sectors such as transport, residential and agriculture as well as increasing the Scottish Government’s support for renewable energy.
 - The Economy, Jobs and Fair Work Committee stated in their report; “*Given the reliance within the CCP on the development and large-scale demonstration of CCS, an as yet unproven technology, the Committee recommends that consideration is given to other available options, alongside CCS.*”

Residential

- **Energy efficiency**: The draft Plan contains no significant increase in spending on energy efficiency, nor any clear details on how regulation will be used to leverage private finance. Overall it provides no credible detail on how the proposed doubling in uptake in energy efficiency measures will be achieved. As concerning is the pace of change which amounts to 1.35 million measures by 2032 or 90,000 per year. In contrast, experts across the fuel poverty field advise that at least 127,000 measures are needed each year to tackle fuel poverty.
- SCCS recommends that the Scottish Government set a target in the final Climate Change Plan to support all homes to reach at least an EPC band ‘C’ by 2025. The roll out of the new Scottish Energy Efficiency Plan must set clear objectives, start earlier and be properly funded to deliver the transformational change which Scotland’s homes require.
 - In their report, the Economy, Jobs and Fair Work Committee stated; “*The Committee looks forward to the planned consultation on minimum energy efficiency standards in the private rented sector but recommends that SEEP now be taken forward with some urgency.*”
- **Heat**: Whilst the ambitions on heat in the draft Plan are set very high, the policy action to deliver them is lacking, particularly beyond 2025. The final Plan should provide a clear signal of policy support to the low carbon heat sector and give confidence to stakeholders that the transition to low carbon heat can move forward with urgency from today.
 - As the Local Government and Communities Committee stated in their report; “*The Committee has concerns with Policy Outcome 2 given that its progress is concentrated between 2025 and 2032 and the proposal identified appears to be significantly reliant on decisions of the UK Government on the gas network in the delivery of carbon savings in the residential sector. The Committee believes that there is a risk that targets may not be met due to a lack of policy information in early years and a reliance on new technologies. The*

Committee believes that there should be further information on the Scottish Government's plans to [decarbonise] the residential sector in the final version of the Plan."

Transport

- Expected levels of demand: By locking in expected traffic demand growth of 27%, rather than tackling the causes of demand growth, the draft Plan sets a very challenging and expensive pathway for emissions reductions in transport. For example, the proposed APD cuts will encourage more flying, not less. Meanwhile, the Plan makes little effort to make active travel and public transport more safe and attractive, as suggested by the Scottish Government's own behavioural research. The Scottish Government should set out credible predictions of transport demand a) if no action is taken; and b) if demand management policies are enacted. Further, it must commit to better financing of active travel and facilitating the introduction of demand management policies such as Workplace Parking Levies by local authorities.
 - The Rural Economy and Connectivity Committee stated in their report: *"The Committee heard that stakeholders are unconvinced by the assumption that vehicle traffic will grow by 27% by 2030 and the Minister's explanation of the figure lacked clarity"*. The Committee urged the Scottish Government to provide further information about traffic growth assumptions and their role in setting the level of ambition in the transport sector of the draft Plan.
- Active travel: The draft Plan sets out an expectation that cycling rates will increase from 1% in 2016 to 10% in 2020 but contains no new funds or policies to achieve this, instead maintaining active travel funding at its current level. This is not credible. The Scottish Government must increase the active travel budget to 10% of the overall transport budget to achieve the step change in active travel described in the draft Plan.
 - As the Rural Economy and Connectivity Committee pointed out in their report, *"...action to reduce travel demand and interventions aimed at encouraging modal shift to active and sustainable modes have been largely absent in all three Climate Change Plans."*
- Electric vehicles: Whilst the draft Plan predicts an increase in the sales of electric vehicles, the level of ambition is disappointingly low. The draft Plan does not present the strong suite of new policies required to accelerate the sales of EVs, let alone what is needed to meet the ambition set out by the UK Committee on Climate Change. The UKCCC recommends that 65% of new car sales should be electric by 2030, compared with just 27% as set out in the draft Plan. Given this, SCCS is concerned that the draft Plan is so reliant on the increased uptake of EVs to meet its targets.
 - As the Rural Economy and Connectivity Committee pointed out *"witnesses raised concerns that the draft CCP is overly reliant on the uptake of ultra-low emission vehicles to achieve transport emission reductions"*
- Air Passenger Duty: The draft Plan predicts that Air Passenger Duty (APD) will be cut and demand for air travel will increase. The Scottish Government must ensure that APD remains at its current level to cut emissions, improve air quality and promote behaviour change both here in Scotland and around the world.
 - The Rural Economy and Connectivity Committee said: *"The Committee recommends that the potentially negative impact on carbon levels as a result of the proposed reduction in air passenger duty should be clearly covered in the CCP. It also recommends that the Scottish Government should commit to undertaking and publishing an analysis of the likely increase in carbon emissions from aviation if air passenger duty were to be reduced."*

Services

- Heat: The recent Energy of Scotland report by WWF Scotland, Friends of the Earth Scotland and RSPB proposed 40% renewable heat penetration by 2030, achieved through a roll out of heat pumps alongside new district heating regulation. In comparison, the draft Plan predicts that 94% of non-domestic buildings will have low carbon heat by 2032, without setting out clear policy pathways for achieving this increase.
- The Scottish Government should establish a clear, credible path with detailed policies and milestones for achieving the ambitions on heat. This should include an earlier start in the shift to low

carbon heat, building on existing success in heat pumps and district heating and growing Scottish low carbon heat businesses.

Land Use, Land Use Change and Forestry

- Peatland restoration: The draft Plan includes a welcome commitment to restore 310,000ha of degraded peatland by 2032 however we agree with the ECCLR Committee who seek “*specific detail on the protection and continuation of funding for peatland restoration*”. We favour the return of Peatland Action as the delivery body.
- Blue Carbon: The draft Plan contains no reference to Blue Carbon despite a commitment to further research in RPP2.
 - The ECCLR Committee recommends that the Scottish Government should “*reinstate a section on blue carbon*” and that “*proposed action should be included in the final Climate Change Plan*”
- Forestry: The draft Plan includes a target to plant 15,000ha of trees per year by 2025. This is an ambition welcomed by SCCS and by MSPs across the Parliament, however it lacks credibility given that the existing target of 10,000ha per annum has been repeatedly missed, with an average of just 6,800ha planted since the last RPP.

Agriculture

- Low ambition: The predicted emissions reductions are the lowest of any sector at just 0.9MtCO₂e by 2032, compared with the UKCCC’s high ambition scenario of 1.5MtCO₂. Furthermore, the plan relies on awareness raising and voluntary approaches to produce behaviour change amongst farmers which goes against UKCCC recommendations.
 - Both the ECCLR and REC Committees agree on a need for regulatory backstops to be set; as the REC Committee stated “*it is reasonable and sensible for the Scottish Government to be ready to consider alternative approaches should the voluntary approach prove to be insufficient.*”
- Compulsory measures: The draft Plan contains no policy for compulsory soil testing despite a commitment from the Cabinet Secretary for Environment, Climate Change and Land Reform, both in evidence to the Environment, Climate Change and Land Reform Committee in October 2016 and in the Scottish Parliament in January 2017 that this would be in the Plan.
 - The ECCLR Committee “*...recommends the policy of compulsory soil testing for improved land be reinstated in the final Climate Change Plan.*”
- Organic farming: The planned marketing campaign on low carbon farming could be effectively replaced by support for organic farming which is already low carbon and has an Organic kite mark system in place.
 - As the REC Committee pointed out, “*... there was a lack of focus on organic farming, consideration of demand side measures or conservation tillage where this is appropriate, in the Draft Climate Change Plan. It calls on the Scottish Government to consider their inclusion in the final draft.*”
- Timescales and milestones: The Agriculture section contains no policy commitments beyond 2025, despite the draft Plan covering the period up to 2032. Furthermore, the draft Plan contains no measurable indicators to show when the policies are expected to be delivered over time.
- Carbon audits and Nitrogen budget: The draft Plan should include a clear mechanism for the roll out of Carbon Audits up to 2032 with a regulatory backstop indicating the level of voluntary uptake expected before a measure is made compulsory. SCCS also believes that a Nitrogen Budget for Scotland with targets should cover more than just on farm fertiliser use.
 - The REC Committee “*urges the Scottish Government to be more ambitious regarding targets for carbon audit uptake*”. REC also encouraged “*...the Scottish Government to be more ambitious and to create a Nitrogen Budget for Scotland*”.

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