Stop Climate Chaos Scotland welcomes the opportunity to brief MSPs on the second Report on Proposals and Policies (RPP2). It is with considerable disappointment that we read that despite missing the first annual emissions reduction target, very little new effort is described in RPP2 compared to RPP1 which was published in March 2011. Instead the Government has published a re-statement of existing policies, which is not ambitious enough to meet Scotland’s challenging emissions reductions targets. SCCS remains unconvinced that enough steps are being taken now to ensure every annual target can be met.

We call on MSPs to ensure the second RPP package guarantees that we never miss a climate target again. At the end of the scrutiny period, the Parliament must ensure this document is sufficiently credible, ambitious and transparent, by ensuring that there is:

- A shift from ‘proposals’ into ‘policies’;
- Increased effort in early years;
- Specific improvements to transport and homes.

**A shift from ‘proposals’ into ‘policies’**
The RPP relies heavily on the EU increasing its 2020 ambition to 30% emissions reductions and on the introduction of unspecified, unfunded, future ‘proposals’. For example, in 2020, 64% abatement in the land-use sector will come from proposals and 41% housing abatement from proposals. While we accept there is a place for proposals in the RPP, the current reliance significantly undermines its credibility. As acknowledged by the Climate Change Minister on 21 November 2012, ‘we will achieve our targets on climate change only if we implement as many as possible of the proposals and policies in the RPP.’ SCCS agrees the only way in which to meet all our targets is by fully implementing all proposals and policies.

**Increased effort in early years**
Despite general agreement in 2009 as the Bill passed through Parliament that ‘early action’ to cut emissions was vital, the RPP appears to ‘backload’ substantial effort in all sectors to beyond 2020. Again, this substantially undermines the credibility of the document. For example, in the transport sector, no abatement is attributed to an unexplained headline of ‘lower emissions potential in transport’ until 2025-27, in which a significant abatement (250/500/750 ktCO2e) is attributed at largely no additional cost. The table below describes the balance between early and late action in the transport sector.

<table>
<thead>
<tr>
<th>Proposals &amp; policies - transport</th>
<th>2013-2020</th>
<th>2021-onwards</th>
</tr>
</thead>
<tbody>
<tr>
<td>RPP1</td>
<td>11,241 ktCO2e</td>
<td>5,642, ktCO2e (2021-22)</td>
</tr>
<tr>
<td>RPP2</td>
<td>7,261 ktCO2e</td>
<td>20,678 ktCO2e (2021-2027)</td>
</tr>
</tbody>
</table>

It is worrying that many important low carbon transport policies – such as cycling and walking, travel planning, car clubs - are described in the RPP2 as ‘proposals’ and not ‘policies’. The RPP2 states that ‘while in most cases they are already being taken forward, they are not being implemented at the intensity required for the abatement figures in the document.’ This sends a worrying signal about the intention the Government has to implement these policies. It is crucial that these ‘proposals’ are described as ‘policies’ and are implemented at a higher intensity to achieve the necessary abatement.
Specific improvements on TRANSPORT:
Transport is the weakest section of the RPP by far, with a focus on technical measures, such as a switch to biofuels, green buses or the widespread adoption of electric vehicles, but a distinct lack of measures that will reduce the volume of traffic on Scotland’s roads or that encourage modal shift. This section lacks transparency, with abatement attributed to unexplained policies, a reliance on EU Directives to deliver emissions reductions.

SCCS calls on MSPs to recommend the following changes:
- More ‘proposals’ – such as cycling and walking, car clubs, travel planning - must be translated into ‘policies’ and efforts to implement them stepped up.
- The RPP2 must explain how significant abatement is attributed in 2025-27 and what steps are being taken to achieve this.
- Full roll-out of devolved measures must be developed (as recommended by the UKCCC in January 2012), such as demand reduction measures, to increase early abatement from the transport sector.

Specific improvements on HOMES
Emissions from the residential sector were 3% greater in 2010 than in 1990 and this is one of the major contributory factors to Scotland having missed the 2010 Climate Change Act target. We welcome the inclusion of a proposal to introduce minimum standards for the private housing sector. However we have some significant concerns about the ambition, timescale and effectiveness of the policies and proposals as outlined in RPP2. A step change in improving the energy efficiency of our housing stock is required and RPP2 falls short of reflecting this.

SCCS calls on MSPs to recommend the following changes:
- The National Retrofit Programme must have a clear timetable to cover all Scottish households.
- Regulations for minimum energy efficiency standards must be introduced by 2014, with standards in place by 2015, or 2016 at the latest.
- 2013 new build standards for domestic buildings should be set at a 60% reduction in carbon dioxide as recommended by the Sullivan report rather than weakened to a 45% cut.
- The Government must explain what the proposal ‘significant technical abatement potential’ means in the housing sector, and what steps are being taken to achieve this.

Specific improvements on RURAL LAND-USE
The rural land-use section again lacks credibility. When compared to RPP1 there is a reduction in the abatement ambition from policies in the land use sector, and too many of the policies and proposals rely too heavily on voluntary uptake – particularly in agriculture. Peatland restoration is newly included in RPP2 as a ‘policy’, although this is a restatement of an existing commitment of £1.7m for restoration. SCCS has called for 600,000ha of Scotland’s blanket bog under restoration management within 10 years.

SCCS calls on MSPs to recommend the following changes:
- Formalise and commit to restoring a minimum of 21,000ha/yr of peatland restoration, with a commitment to finding funding for this.
- In order to drive farmers to take up measures such as nitrogen efficiency now, a date and a regulatory trigger must be set and publicised.

On 25 October 2012, Stop Climate Chaos Scotland facilitated a meeting between people from across Scotland with their MSPs, demonstrating strong public support for more action on climate change. Concerns were raised about the failure to hit the first target under Scotland’s world-leading Climate Act, particularly the failure to act to reduce emissions in homes and transport. 55 MSPs signed motion in 2012 calling on ‘bold action’ to meet Scotland’s emissions targets (S4M-02093). SCCS now calls on MSPs to play their full part in ensuring that this plan meets the minimum needed for the plan to be credible, ambitious and transparent.

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