



Stop Climate Chaos Scotland

Briefing on Scottish Government's response to EET Committee's RPP2 recommendations

August 2013

Introduction

The second Report on Proposals and Policies is an important document, setting out how Scotland will achieve its challenging climate change targets each year to 2027. It is a document that will last until a revision - RPP3 - is published in 2016. Stop Climate Chaos Scotland was encouraged by the level of engagement and scrutiny of the report by four Parliamentary Committees. However, as a broad civil society coalition, we were concerned that many of Committees' substantive concerns and recommendations were not adequately addressed in the final report.

In this document, we set out our views on the Scottish Government's response to EET Committee recommendations.

The consultation process

We welcome the commitment to considering whether there are more and or different kinds of engagement activity to add greater insight and value to future climate change development. The full implementation of the Scottish Climate Change Act will bring about many changes to the way in which the Scottish economy, and Scottish society, develops. Many changes are required of people in Scotland, from the way we travel to the way we live and the choices we make.

The Government need to engage people much more in the process of developing climate change policies, to lead to better understanding of the reasons and the measures we need to take to move quickly and effectively to a low carbon Scotland. The development and publication of both RPP1 and RPP2 did not include formal wide stakeholder engagement, and we feel this is something that the Government should give serious consideration to in the preparation of RPP3.

Measuring progress

We welcome the additional tables in the chapters highlighting the progress made since publication of RPP1. This improves the clarity of the document, and we recommend this for future RPPs. The Government may consider publishing mid-term reports on the progress made between RPP2 and RPP3, to allow greater scrutiny of progress against objectives.

Clarity and transparency

SCCS considers that concerns regarding the format and presentation of the document were largely addressed in the final report. In particular, it is useful that the final report includes percentage reductions by sector compared to 1990 as well as clarity over whether policies and proposals sit at an EU, UK or Scottish level. It is also useful that further information on costs and benefits is included in the final RPP2.

The response states that the new Climate Change Delivery Board, formerly the Emissions Reduction Board, will have 'robust oversight' of the delivery of emissions reductions. Transparency of this group is important and we note that the Scottish Government's web pages about this Board¹ do not appear to have been updated since February 2013. We recommend there is more accountability and transparency about this group, so that it is enabled to provide this 'robust oversight' role.

Missed 2010 target and meeting future targets

There has been very little change to the report in terms of providing greater assurance that all future emissions targets set under the Scottish Climate Change Act will be met. Given that the first two annual emissions reduction targets have been missed, this is a major concern. We are disappointed that the missing of the targets did not lead to additional action, as required by section 36 of the Scottish Climate Change Act, to compensate for lost ground.

¹ <http://www.scotland.gov.uk/Topics/Environment/climatechange/scotlands-action/EmissionReduction>

The Scottish Government response to this point offers no change or improvement to address this recommendation from the Committee, restating the same explanation offered during the scrutiny stage: ‘The Scottish Government acknowledges the points raised about the balance of proposals and policies in the RPP2 but would emphasise need for the RPP2 to incorporate flexibility’. An additional explanatory paragraph in the RPP2 is not the same as ‘setting out proposals and policies to compensate in future years for the excess emissions’ as stated in the legislation.

The Climate Change Minister in his RPP2 evidence session with the RACCE Committee acknowledged the lack of certainty within RPP2 that annual targets will be met: “I recognise that if we do not have that [*EU move to 30% 2020 target*] in place, we will be in a more vulnerable position in terms of annual targets, so we need to reflect on that.” The final RPP2 does not set out a less vulnerable position in terms of annual emissions reduction targets.

We are concerned by the language used by the Minister to Parliament on 27th June regarding the annual targets: “It is clear that the basis on which this Parliament set Scotland’s climate change targets has changed significantly over the past few years. That is something that the Scottish Government will keep under review.” Given that the science is unequivocal that, to prevent the worst effects of climate change, emissions need to reduce dramatically as fast as possible, any language about reviewing targets is both unhelpful and unnecessary. This is particularly pertinent when there are so many policy levers the Government can still use, backed up with appropriate levels of funding in Scottish Budgets, to meet targets.

Renewable heat target

We are pleased that the committee is interested to look in more detail at the Heat Generation Policy Statement when published later this year, and the implementation of the recommendations of the Expert Commission on District Heating. This has a key role to play in meeting our climate change targets.

Technical innovation proposals and timescales

The additional detail set out with regard to further abatement potential (Homes and Communities on p124, Transport on p183 and Rural Land Use on p216 of RPP2) is welcome, though we remain concerned at the high levels of emissions abatement attributed to vague proposals far in the future rather than concrete actions in the shorter term.

We welcome the commitment to develop and refine the technical abatement proposals and set out more information in RPP3. This work must begin now in order to have more detail available for RPP3, or to even be able to bring in some of these proposals earlier. We encourage the Committee to keep a watching brief on the development of these proposals.

Scottish energy efficiency schemes

The Government states that monitoring arrangements for new programmes will be addressed in the Sustainable Housing Strategy. We would welcome more information on which committee will take charge of scrutiny of this document.

Looking forward

It is essential that the policies and proposals detailed in the report are developed, adequately funded and rolled out as described or earlier if possible. We welcome the announcement that additional money has been secured in the forthcoming Scottish Budget for funding of climate change measures. We hope the committee scrutiny of the Budget will build on the scrutiny of the RPP2. SCCS will continue to work with Parliament and Government to identify additional opportunities to secure emissions reductions.

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Stop Climate Chaos Scotland (SCCS) is a coalition of organisations campaigning on climate change, including environment, faith and development organisations, trade and student unions and community groups.

Stop Climate Chaos Scotland is a charity, registered in Scotland