



Stop Climate Chaos Scotland

Briefing for parliamentary debate on the Draft Second Report on Proposals and Policies (RPP2)

March 2013

"The backdrop of Scotland missing its first annual climate change target in 2010 by 2% brings into sharp focus the need for RPP2 to be as robust as possible in helping Scotland meet its future annual targets."

Rural Affairs, Climate Change and Environment Committee report on RPP2

Introduction

Since the passing of the Scottish Climate Change Act in 2009, this is one of the most important debates in which MSPs will have the opportunity to participate. The RPP2 is a key test of the substance behind Scotland's commitment on climate change and a powerful measure of the Scottish Government's willingness to turn ambition into action.

In January this year, Stop Climate Chaos Scotland (SCCS) was pleased to see parties unite on the need to see increased effort to meet our climate change ambitions. Sadly, the draft RPP fell well short of providing this. Following Parliamentary scrutiny, the final RPP must set out a credible, ambitious, and transparent blueprint for Scotland's transition to an economy better equipped to deal with a changing climate, making the most of the opportunities that 'low carbon' has to offer Scotland's people and providing a stable basis for meeting Scotland's emissions targets to deliver climate justice.

A number of witnesses who gave evidence to the four Parliamentary committees expressed significant concerns that RPP2 lacked detail, that it looked *"more like wishful thinking than something that has a plan behind it"* (Prof Pete Smith, University of Aberdeen) or *"a set of policies and proposals that are being pushed out there without, if you like, a way of landing it"* (Dr Andy Kerr, University of Edinburgh).

Many witnesses offered committees persuasive arguments for major changes to RPP2 to increase the level of effort to meet our climate targets. In order to stimulate behaviour change in individuals and cultural change within society, the signals must be strong, and all lined up in the same direction.

Summary

SCCS calls on MSPs to ensure the final RPP2 is a credible package to enable Scotland to meet commitments under the Scottish Climate Change Act and remain an international example on this agenda, by securing:

- A significant shift from 'proposals' into 'policies';
- Increased effort in early years rather than the proposed delaying of action beyond 2020;
- A strengthening of policies, particularly in the area of transport;
- Improved transparency, monitoring and evaluation with the inclusion of key milestones for 2015 and 2020 for each chapter of the RPP2.

A shift from 'proposals' into 'policies'

The Rural Affairs, Climate Change and Environment Committee report on RPP2 says: *"The Committee is concerned that the draft RPP2 fails to strike the appropriate balance between policies and proposals. In the case of some of the large number of proposals it is unclear if and/or when they would become firm policies, and how these might be properly researched, monitored and funded."*

SCCS believes RPP2 relies too heavily on the EU increasing its 2020 target 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 RPP2, the current overreliance on these uncertainties significantly undermines the RPP2's credibility. As acknowledged by the Scottish 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."* As the table below outlines, there is no margin of error built into the plan:

EU shifts to 30%	Yes	Yes	No	No
All proposals	Yes	No	Yes	No
All policies	Yes	Yes	Yes	Yes
Outcome	Hit all targets	Hit 7 targets, miss 8	Hit 8 targets, miss 7	Hit 2013 target

The Economy, Energy and Tourism Committee report on RPP2 says: *“Given the concerns expressed by witnesses that the EU will not adopt a 30% emissions reduction target for 2020, we ask the Scottish Government to identify in the final RPP2 explicit proposals and policies which would mitigate this risk to achieving its emissions reduction targets.”*

The Rural Affairs, Climate Change and Environment Committee report on RPP2 says: *“It is clear from the draft Second Report on Proposals and Policies (RPP2)2 that there is only one combination of circumstances that will allow Scotland to meet each of its annual targets from 2013 until 2027. This requires implementation of all the proposals and policies in the draft RPP2, together with a shift in the EU wide emissions reduction target...The Committee ...recommends... that the final RPP2 be more explicit in demonstrating how greater domestic reductions could be achieved within the current 20% EU target.”*

It is concerning that many important existing low carbon transport policies – such as cycling and walking, travel planning, car clubs - are described in RPP2 as ‘proposals’ and not ‘policies’. 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 level of commitment that the Government has to these measures. It is crucial that these ‘proposals’ are described as ‘policies’ and are implemented at a higher intensity to achieve the necessary abatement. **The Infrastructure and Capital Investment Committee report on RPP2 says:** *“Decarbonising vehicles is the only area where the Scottish Government has listed actual policies in relation to reducing emissions from the transport sector and they consist solely of two European directives.”*

Increased effort in early years

Despite general agreement in 2009 as the Scottish Climate Change Bill passed through Parliament that ‘early action’ to cut emissions was vital, RPP2 appears to ‘backload’ substantial effort in all sectors to beyond 2020, under often vague terms such as ‘lower emissions potential in transport’ or ‘additional technical abatement potential’. Again, this substantially undermines the credibility of the document. SCCS believes these vague proposals should be removed from RPP2 and replaced with another credible policy or proposal before 2020 to make up the shortfall. **The Rural Affairs, Climate Change and Environment Committee report on RPP2 says:** *“the Committee notes concerns raised about ...the amount of abatement which it states will occur towards the end of the period covered by the RPP2”.*

The Infrastructure and Capital Investment Committee report on RPP2 says: *“the Committee believes the predicted abatement potential from the lower emission potential in transport proposal for the years 2025 to 2027 is not insignificant and is concerned that it is unclear as to how these abatement figures have been calculated...The Committee recommends that the Scottish Government include further information in the final RPP2 on what the additional technical potential figures are based on and the modeling used in its abatement projections.”*

Specific improvements required on transport:

Transport is the weakest section of RPP2 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. **The Infrastructure and Capital Investment Committee report on RPP2 says:** *“The Committee recommends that the Scottish Government continues to monitor the impact of initiatives in relation to encouraging behavioural change and whether certain demand management initiatives might require to be considered.”*

SCCS calls on MSPs to recommend the following changes to the draft RPP2:

- More ‘proposals’ – such as cycling and walking, car clubs, travel planning - must be translated into ‘policies’ and efforts to implement them stepped up. As a minimum, the measures listed as ‘Package 3 – Sustainable Communities’ should be appropriately funded policies.

- 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. A step change in improving the energy efficiency of our housing stock is required and RPP2 falls short of reflecting this. **The Infrastructure and Capital Investment Committee report on RPP2 says:** *“The Committee believes that the transformational change required in the housing and transport sectors ...must involve a combination of all the proposals and policies contained within the draft RPP2 being implemented and adequately funded, appropriate timescales for action and incentives for individuals and society as a whole to make the necessary step change required.”*

SCCS calls on MSPs to recommend the following changes to the draft RPP2:

- The ‘proposal’ for minimum standards should be upgraded to a ‘policy’ described as ‘a minimum standard of energy performance for the whole private sector housing at the point of sale or rental’, and the date for introduction brought forward to 2015. **The Infrastructure and Capital Investment Committee report on RPP2 says:** *“The Committee...requests that the Scottish Government investigates whether the timescales for the introduction of these minimum standards could be revised with a view to an earlier than 2018 introduction”.*
- A commitment to the introduction of 2013 building regulations for both domestic and non-domestic buildings in line with recommendations from the 2007 Sullivan Commission.

Specific improvements on rural land use

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 calls on MSPs to recommend the following changes to the draft RPP2:

- A formalisation and commitment to restoring a minimum of 21,000ha/yr of peatland restoration, with a commitment to finding funding for this.
- Inclusion of a date and a regulatory trigger to encourage farmers to take up Nitrogen Efficiency Measures if they want to avoid regulation in future.

Low carbon behaviour change

SCCS regrets that the Behaviour Change Framework was published separately from RPP2, but welcomes the Parliament’s interest in low carbon behaviour change. For RPP2 to deliver the change it needs, a strategic approach is needed to incorporate low carbon behaviour change into all proposals and policies. We therefore call on MSPs to recommend the final RPP2 contains a strategic approach to cover the provision of funding, information and advice and have accompanying engagement strategies based on the latest behaviour change research. **The Local Government and Regeneration Committee report on RPP2 says:** *“we recommend that ‘behavioural change should find expression in all sections of the RPP2 report and should not be stand alone as change is needed across all sectors of the economy and society.’ Without a significant change in behaviour the targets will not be met.”*

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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