

STOP CLIMATE CHAOS SCOTLAND RESPONSE TO ENVIRONMENT, CLIMATE CHANGE AND LAND REFORM COMMITTEE CALL FOR VIEWS ON THE CLIMATE CHANGE PLAN UPDATE 2021

ECCLR is particularly interested in the following questions as they relate to: -

- overview and ambition, development of updated Climate Change Plan;
- climate change governance (including monitoring and evaluation);
- behaviour change;
- water;
- resource use;
- land use (including peatlands and land use by the public sector);
- marine/blue carbon;
- waste and circular economy;
- green recovery as it relates to this Committee's remit and anything not covered by other committees.

This response is submitted on behalf of Stop Climate Chaos Scotland ("SCCS"), the diverse coalition of over 50 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. This response complements those responses submitted by individual member organisations and by individuals who are associated with SCCS or its members.

This response is based on an analysis of the CCPu against the various [transformational changes](#) that SCCS called for, as the Government was preparing the update.

1. What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?

It is self-evident that progress to date has been insufficient. Greenhouse gas data, [released by the Scottish Government](#) in June 2020 showed that Scotland has missed its annual target for reducing emissions. **Climate change emissions actually increased between 2017 and 2018 by 1.5%**. In response to these data, [SCCS called for more actions](#) to deliver real and sustained reductions – this CCPu was the opportunity to deliver such actions, many of which [were proposed in advance by SCCS](#).

2. Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?

(a) Overview and ambition

SCCS welcomes the publication (albeit delayed by Covid etc) of the CCPu and the headline re-commitment to net-zero by 2045 and 75% by 2030 is consistent with new statutory targets. We further welcome re-commitment to a number of policies/proposals (such as £500m for active travel first announced in PfG) as well as a few high-profile new proposals (such as moving the date for the phase out of diesel and petrol cars and vans from 2032 to 2030 and a very interesting new commitment to reduce car traffic on Scotland's roads by 20% by 2030.).

The emissions envelopes and total presented at p253 suggest reduction from 41.6 MtCO₂e in 2020 to 18.3MtCO₂e in 2032. This represents a reduction of 23.3MtCO₂e. Given uncertainties (see below) this may be close enough to the target of 25MtCO₂e presented by SCCS as the plan was being developed – however, this also underlines the need to address those uncertainties as soon as possible.

Worryingly, while the overall emissions reduction targets are possibly sufficient, the data for each sector contributing (and how the suggested policies and proposals contribute to delivering such reductions) is, to say the least, “obscure”. This is because “these [sector] envelopes have been developed through an iterative process which combines evidence, analytical modelling and the application of judgement in the face of considerable uncertainty” (p251).

Such uncertainty arises, in great part, due to the tentative or unpredictable nature of many of the policies/proposals. For instance, many are – in fact – simply promises ‘to review’, ‘to consult’, etc and depend on subsequent ‘roadmaps’, strategies, or action plans (the content of which is unknown at present). Thus, while many intentions are positive, it is unclear whether or how these will be realised – and thus what reductions in emissions will result.

This uncertainty is reflected in the statement (p7) that “*our approach must be iterative; we must learn by doing. No-one currently has all the answers on how we deliver the transition over the next 25 years... By monitoring, evaluating, updating, and adapting this plan over the coming decade we can be on track to meeting our ambitious targets and capturing the opportunities of the transition. This iterative approach will prepare the ground for the next statutory Climate Change Plan, which is to be completed by early 2025.*”

This therefore underlines the need for regular scrutiny of progress, for close examination of the various plans and strategies that are to be developed, for early/effective implementation of those plans and strategies, and for monitoring of real/predicted emissions reductions. Such scrutiny, as this plan is implemented, may be a task that the relevant Committee(s), in the next Parliament should undertake.

In addition to these general concerns about uncertainty, our overall assessment of the CCPu shows that there are several welcome and positive measures (both existing and new), but there are also many significant concerns. For buildings, there is good progress made, and in sectors such as transport and waste, there are a number of positive ideas. However, we remain concerned that few specific actions have been proposed to “grasp the nettle” on some big challenges (such as agriculture and aviation to/from Scotland).

It is also disappointing that, in areas where Scotland has the potential to be world-leading (such as peatlands, forestry and the marine environment), the policies in the plan are little more than the status quo along with proposals for further research and the exploration of further ambition.

We also believe that the plan should integrate the role of communities in a much more systematic way with regards to the sectoral chapters, much as each chapter includes detail on the roles individuals, businesses and the public sector will have to play in achieving our targets. While community climate action is touched upon at some points in the CCPu, including in the Green Recovery chapter and the section on food and climate change, we believe the role of communities should be included much more consistently across each sector in the final Plan, not least with regards to electricity, buildings, transport and waste.

The plan contains no policies or proposals in relation to Scotland’s international work or global climate justice. All references to “international” relate to cooperating with other countries (or international organisations) to address domestic emissions collaboratively. The 2019 Act requires the Climate Change Plan to:

1. set out “proposals and policies for supporting... action in developing countries to reduce emissions of greenhouse gases and adapt to the effects of climate change” [(24 (19))],
2. set out “how the implementation of this plan is expected to contribute to the achievement of sustainable development, including the achievement of the United Nations Sustainable Development Goals (SDGs)” [24 (24) (b)],
3. “have regard to the climate justice principle” [24 (23) (a)].

The above provisions are central to ensuring that Scotland’s climate legislation is aligned with global efforts to tackle the climate crisis, such as the provisions expressed in the Paris Agreement for

developed country partners to support developing country partners meet their commitments to climate adaptation and mitigations.

Furthermore, as Scotland will host COP26 in 2021, and as First Minister is now European co-chair of the Under 2 coalition, it is vitally important that Scotland shows international leadership via its climate regulations. This climate leadership must be demonstrated not only through domestic policies to achieve targets, but through making firm policy commitments to global climate solidarity.

This leadership can be shown in the CCPu through addressing the provisions above set out in the Climate Change Act. This should include clear new policy commitments to support developing countries affected by climate change – such as via a significant increase to the climate justice fund – a clear assessment of domestic policy provisions to ensure that they have a positive contribution to global sustainable development and the climate justice principle. Moreover, it is welcome that the Scottish Government has included in its CCPu recognition of its role at COP26 and its ambition for engagement at the conference. Notable in its absence, is commitment for the Scottish Government to formally engage with the most impacted countries and communities in the global south ahead of the conference. In the spirit of global climate leadership, it would be appropriate for this plan to include commitments for Scotland to use its platform to champion the voices of the global south in its engagement at COP26.

Finally, carbon capture and hydrogen made from natural gas are, disappointingly, still too big a part of the Scottish Government's plans. However, previous enthusiasm for these two linked technologies has been tempered by reality and they are now only envisaged to be significant by the end of the decade.

Our detailed comments on the specific policy areas (below, and in submissions to the EEFW, LGC and REC Committees) illustrate, in more detail, why Parliament should require more detail, clearer timescales and greater specificity. While the Plan's overall targets are ambitious and welcome, the actions to achieve these are insufficient or unclear.

Before addressing specific matters, however, the Committee may wish to consider, as part of its assessment of the update as a whole, the issue of policy coherence. While we have not identified any inherently incoherent policies within the plan, this is, to a large extent, a result of the various uncertainties described above (such as proposals being subject to further action plans, strategies, etc). Thus, any internal incoherence is 'hidden'. For example, there is no obvious incoherence between the ambitions for forestry and peatland (despite potential and past conflicts). This is because each is subject to further reviews/policy development, as well as the Regional Land Use Strategies – so fixing any incoherence is delayed.

Possibly, however, a more serious challenge would be to consider incoherence between the plan and other policies – e.g. between transport emissions reduction ambitions and existing policies on road building/aviation that are not in the plan. The Committee may wish to ask the Government what steps it is taking to evaluate the consistency of other, unmentioned policies with the ambitions set out in the CCPu.

(b) Land use (including peatlands and land use by the public sector)

There is a need for greater clarity over the emissions reduction figures – especially about the forthcoming inventory change for peatlands. The latest figure (2018) for LULUCF is -5.4 MtCO₂e but the graph in the CCPu has a 2020 figure of +0.6 MtCO₂e. This suggests that 6 MtCO₂e has been added to factor in the forthcoming inventory change relating to peatlands. If this is the case, then a decision to be optimistic must have been taken because the CCC suggest that all emissions from peatlands in Scotland could add between 6 MtCO₂e ('low') and 10 MtCO₂e ('high') to the latest Scottish inventory. If this is right, the Government should be asked the basis for this decision – as the 4 MtCO₂e difference makes a great deal of difference in determining whether targets are met.

Forestry

The CCPu does not include any new, ambitious new target for woodland creation; it simply re-iterates existing targets, and makes little, if any, effort to distinguish between intensive, non-native forestry and native woodland. Both can be beneficial in terms of carbon – but the former is dependent on the

management practices adopted and use of the products (for instance, short rotation conifers used for biomass or pulp soon return any sequestered carbon to the atmosphere).

Funding is probably adequate, given that it is reiteration of existing funding for existing targets and without any target % for native trees.

The emphasis, elsewhere in the plan, on making energy from burning trees and capturing the carbon is, [according to Richard Dixon](#), “technically possible but you’ve got to like your hillsides plastered with Sitka spruce to make it work, in a return to the bad old days of 1980s-style forestry policy.”

Peatlands

Although the CCPu talks of “boost[ing] our commitment”, this is, in fact, a restatement of existing targets/funding (albeit that these targets/funding were increased relatively recently). The plan does, however, commit to research and review towards more ambition, but it is unstated what the new ambition should be.

There is no commitment in the CCPu to ending the burning of peatland; however, this was addressed in a separate Ministerial statement as part of Werritty response (see <https://www.gov.scot/news/werritty-report-response/>).

In relation to the use of peat for horticulture, there is a commitment to “not support” such planning applications. However, there is no decisive commitment to prevent Local Authorities granting consent; and nothing is said about existing/old consents. Meanwhile, the CCPu commits to “seek to” phase out the use of horticultural peat, but only by promoting alternatives and stakeholder engagement – there are no decisive bans/actions.

Deer

The issue of deer management is not addressed in the CCPu, despite its potential to contribute to woodland (and thus carbon) targets. The formal Government response to the independent [Deer Working Group](#) is still awaited.

(c) Marine/blue carbon

While the potential opportunities (if well-managed) and threats (if mismanaged) of blue carbon are noted, and the commitment to further research is reiterated, there are no specific policy proposals beyond the commitment to a “Blue Economy Action Plan” at some unspecified future date.

Given the at-risk stores of carbon in marine ecosystems, as well as their potential to provide for further carbon absorption (as well as adaptation benefits), this is a huge, missed opportunity. The scale of this missed opportunity is illustrated by reference to the 2018 CCP, which states “Many habitats and species important for blue carbon – Priority Marine Features – are given general protection under the National Marine Plan and many are also safeguarded within Scotland’s Marine Protected Area Network, providing potential to enhance these important ecosystems.” However, the recently published “Scottish Marine Assessment 2020” recorded losses in most “biogenic”/blue carbon habitats and various Ministerial commitments to provide protection to these habitats and the MPAs have been breached/missed, including commitments made to ECCLR. Parliament should encourage the Government to revisit marine and blue carbon issues to include specific objectives, actions, and speedier delivery to address the missed opportunities described above. As a maritime nation, with significantly larger seas than its landmass, it is vital that we deal with marine climate matters as thoroughly (at least) as terrestrial matters.

(d) Waste and circular economy

It is disappointing that there isn’t a moratorium on the building of new incinerators in Scotland. The commitment to “consider measures to ensure new energy from waste plants are more efficient and how waste infrastructure can be ‘future-proofed’ for carbon capture and storage (CCS) technology” (p161) is about making such plants ‘less bad’ rather than removing the threat.

The targets to “reduce the percentage of all waste sent to landfill to 5% by 2025 and recycle 70% of all waste by 2025” (p160) are welcome; however, the “investments to deliver on these targets,

including £70 million to improve local recycling collection infrastructure.” (p160) fall short of what is required and compare poorly to the significant investments made in Wales.

The “target to reduce food waste by one third against a 2013 baseline by 2025” (p160) is welcome but must also be continued beyond 2025 – to achieve, for example, a 50% reduction by 2032.

We welcome and support the new target to “end landfilling of biodegradable municipal waste by 2025” (p160); we look forward to the route map and policies that will deliver this.

In relation to single-use plastics, the CCPu simply refers to the current consultation on banning of problematic single-use plastic items, such as straws and cutlery, identified in the EU’s Single Use Plastics Directive, although it is welcome that this is “with a view to introducing legislation in 2021” (p162). That said, there is no formal commitment to what will be banned by the legislation or when it will come into force, and no mention of actions to promote alternatives. There is also little mention of packaging; we note that Ireland has recently committed to all packaging being reusable or recyclable by 2030 and consider that Scotland should do the same.

While the Deposit Return Scheme is mentioned, there is no commitment to a start date or indication that glass returns included from the outset. The commitment that “we will take further steps to consult on a charge on single use disposable beverage cups” (p162) is just that – a commitment to consult, not to introduce such a charge or to any set timetable.

While the pledge to boost “our commitment to building a circular economy” (p160) is welcome rhetoric, there is no commitment to the (previously promised) Circular Economy Bill, or to any detail as to how this will be achieved.

SCCS supports the more detailed response on circular economy from LINK and the call to embed circular economy principles throughout the CCPu.

3. Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

Addressed, where appropriate in various comments under Q2.

4. To what extent do you think the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors?

Addressed, where appropriate in various comments under Q2.

5. To what extent do you think the CCPu delivers a green recovery?

SCCS fully supports the concept of a “green recovery” and many of our members have contributed to Scottish Government thinking on this issue, as well as delivering ‘on-the-ground’ activities. Our response to the ECCLR committee call for views on green recovery in August 2020 can be read [here](#).

It is self-evident that for a green recovery to be ‘green’, it must, as well as protecting our environment, deliver reductions in emissions consistent with the net-zero by 2050, and 75% by 2030, targets. As indicated in our responses to questions 1-4 above (and in response to the other Committees), we are concerned that the plan, while seeking to achieve these welcome targets, does not contain sufficient detail or commitments to ensure that is the case.

In relation to ‘recovery’, SCCS has always recognised that addressing climate change will require changes to the economy – and we have promoted the concept of a ‘Just Transition’ to ensure that those changes are fair. We therefore warmly welcome that the CCPu states “*across all of the actions in this Climate Change Plan update, we are embedding a just transition, ensuring that we assess how green recovery actions address inequalities and deliver wellbeing outcomes for everyone*” (p42).

It is also very welcome that the Just Transition concept is therefore fully acknowledged in introduction and in the Green Recovery chapter/context, which includes a specific 'box' headed Just Transition and refers to the recommendations of the recent Just Transition Commission.

However, there is no commitment to a separate Just Transition plan or any commitment to revise/update the current Economic Strategy. There is no reference to continuing the (non-statutory) Just Transition Commission or placing it on a statutory basis. While there are references to the role of Enterprise agencies, growing the clean energy industry and the roles of public procurement, these are primarily all good intentions with unclear delivery pathways.

Accordingly, we therefore recommend that the 'green recovery' aspects of this plan are (a) made genuinely 'green' by the strengthening of the actions to reduce emissions and (b) that the commitments to a just transition are underpinned by, for instance: -

- A clear commitment to a specific Just Transition Action Plan.
- A commitment to continue the Just Transition Commission (and place it on a statutory footing), as well as seek its advice on further steps.
- A commitment to a full revision of the current economic strategy to recognise the need for a green recovery (including major green investment supporting job creation, and strong skills action), as well as a just transition and a transition to a well-being economy.