



Next Scottish Climate Change Plan: some thoughts on scope Stop Climate Chaos Scotland; 1 March 2022

Introduction

[Stop Climate Chaos Scotland](#) (“SCCS”) is a diverse coalition of over 60 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. We believe that the Scottish Government should take **bold** action, across all relevant policy areas, to tackle climate change, with Scotland delivering our [fair share](#) of action in response to the Paris Agreement and supporting climate justice around the world. In some ways, the Scottish Government has adopted a welcome approach – the First Minister has ‘formally’ declared a [climate emergency](#), and we have clear and ambitious targets for emissions’ reductions, positive language related to a just transition as well as action to promote climate justice. However, delivery has often not matched ambitions, with three years of missed targets - a step change is needed to match the reality of the emergency, both in sectoral, domestic action but also in the comprehensiveness of cross-government activity.

The Scottish Government is committed to developing and publishing the next Climate Change Plan (under the 2009 Act as amended) “in the first half of the current Parliament”. To meet this commitment, and lay a draft before Parliament in, or before, November 2023, work is required to start in early 2022. SCCS was therefore pleased to take part in discussions with Scottish Government officials about this process, covering scope, timescale, data/transparency, and other issues, on 31st January 2022. Such early engagement was warmly welcomed by our members, as was agreement to further discussions both strategically and on particular topics/sectors. This paper has been prepared to inform further discussion on the issue of ‘scope’.

Statutory context

Section 35 *et seq* of the [Climate Change \(Scotland\) Act 2009](#), as amended, provides the statutory basis for the Climate Change Plan. This defines the procedures to be followed as well as the sectors that **must** be addressed by “proposals and policies”. However, the legislation is also clear that the plans **may** include “proposals and policies” on “such other sectors or topics as the Scottish Ministers consider appropriate for the plan” (s.35(2)(b)(ii)).

The current [Climate Change Plan](#) updates the previous plan for 2018-2032 in the light of new targets set by the 2019 Act. Part 3, chapters 1-7 of that plan address the statutorily required sectors, while the introduction, Parts 1 and 2, and Part 3, Chapter 8 both provide context (especially the focus on a ‘green recovery’) and additional matters not required by the 2009 Act. So, while the requirements of the 2009 Act (in relation to sectors, the regard to just transition, and the matters covered in s.35) are included, the Plan already extends beyond this “statutory minimum”.

Wider climate change work

In addition to implementing the proposals and policies in the Climate Change Plan, the Scottish Government is active on a number of other fronts in relation to addressing the Climate Emergency. These include: -

- Global, regional, intra-UK and bilateral diplomacy to encourage and agree country-based or co-operative action and/or finance (e.g., membership of Under 2 coalition, bilateral agreement with California, initiative on Loss & Damage at COP26).
- Scottish Government-led finance for international partners (e.g., Climate Justice Fund, new Loss & Damage initiative).
- Development of positions and advocacy on reserved matters that affect climate outcomes, especially oil & gas policy/licences, and potential membership of the Beyond Oil & Gas Alliance, but also aviation matters (for Transport Scotland’s [Aviation Strategy](#) to be genuinely climate-friendly it will need to include views on reserved matters and/or related aviation matters elsewhere in the UK and/or internationally).
- Its [Energy Strategy](#), first published in 2017, supplemented by a [position statement](#) published in the run-up to COP26, but all subject to a review, and the publication of a draft updated strategy in the spring of 2022 ([S6O-00600](#)).
- The establishment of a Just Transition Commission and the development of Just Transition plans.



- While published separately, Scotland's [adaptation programme](#) certainly forms part of the Government's climate change policies. A comprehensive climate change policy statement should reference and/or summarise this, as well as the process/timetable for its revision/updating.
- Marine issues are, in the current Climate Change Plan addressed only in part. This is partly due to limited data/understanding and partly as many marine issues do not (yet) fall within carbon accounting protocols. In addition, marine matters are divided between reserved (oil & gas, shipping, international fisheries negotiations) and devolved (conservation, fisheries management, renewables). SCCS considers that a comprehensive Climate Change Plan should address marine issues in full (albeit noting the relevant research needed and different responsibilities – as well as propose clear actions to maximise the potential for emissions' reductions and adaptation at sea.
- Another area of complexity and divided responsibilities is that related to Scotland's footprint and the effect, on emissions, of our consumption of goods and services from overseas. This should be addressed more fully – and linked with the need to support a Just Transition domestically and overseas and, thus, the international issues referenced above.

While SCCS and its members may or may not support the Scottish Government position/actions on these issues and will, where appropriate, comment and/or criticise, we seek to support Scottish Government action on climate and have generally welcomed their positive approach to engaging with stakeholders such as ourselves from an early stage.

A comprehensive 'climate change policy/action plan'?

Addressing the climate emergency is central to the Scottish Government's mission (see, e.g., agreement with the Scottish Green Party and 2021-22 Programme for Government). As such, SCCS considers that there would be considerable benefits (to the Scottish Government, to stakeholders and to the general public) in the production of a comprehensive statement of all of its positions/actions to address this emergency.

With the new Climate Change Plan to be published/finalised during 2023/4, this seems both an appropriate and convenient time for such a comprehensive statement. In practical terms, it would mean that the formal, statutory plan would form a specified part (perhaps 75%) of a document with a wider remit. This approach would both set the domestic actions in the context of the global picture, but also set out how the Scottish Government is seeking to influence and contribute to the global situation. Setting out clearly its view on reserved matters is appropriate for a Government seeking a new constitutional arrangement but, in any case, seeking to influence UK, EU and international decisions is consistent with its positive para-diplomacy in some areas.

In addition to be a broader 'scope' to be fully comprehensive, the new plan should also contain greater detail - and, in particular, quantify the emissions' abatement from existing/proposed policies. Without such clarity, it is impossible to determine how close/far from target pathways the overall package is or enable informed judgement on the proposals. This concern is shared by the official Climate Change Committee who have [said](#) that they: "have not been able to establish whether and how policies and proposals add up to the required emissions reductions."

Conclusion

The Scottish Government is currently embarking on a process that will lead to a new Climate Change Plan (for 2032 onwards); a draft is needed to be laid in Parliament by November 2023. While this is being developed/scrutinised, latest emissions figures for 2020 and 2021 will become available and any necessary "catch-up reports" produced. Taken together, along with the need to ensure transition and coherence between the current and new plans, these plans and any accompanying policy statements need to demonstrate credibly that the 2030 and 2045 targets for emissions' reduction will be met.

To achieve this the plans, and the policies/proposals therein and accompanying, will need to be ambitious and credible. This means that **the November 2023 document should be both comprehensive and bold**. To be comprehensive, it should set out a full account of all the Scottish Government's ambitions, policies, and position in relation to climate change (of which the formal, statutory Climate Change Plan is a significant part). To be bold and ambitious it must not shy away from new ideas or ideas that might be controversial and/or require significant Government intervention – rather, it makes the case for such action.