

WRITTEN SUBMISSION FROM ABERDEEN CITY COUNCIL

**Q1 The Bill creates a statutory framework for greenhouse gas emissions reductions in Scotland by setting a 50% reduction target for 2030 and an 80% reduction target for 2050.**

**What are your views on the 2050 target and a 2030 interim target proposed in the Bill?**

Aberdeen City Council is fully supportive of the ambitious proposals for an 80% reduction target for 2050 and the inclusion of aviation and shipping emissions.

**Q2 The Bill requires that the Scottish Government sets annual targets, in secondary legislation, for Scottish emissions from 2010 to 2050. It is proposed that these annual targets will be set in batches, the first being for the years 2010 to 2022 inclusive.**

**What are your views on the setting of targets in batches from 2010 to 2022?**

The Council supports the achievable interim targets set out from 2010 to 2022. These are essential to promote early and continued action however it must be stipulated that for a Local Authority budget reporting periods should be in multiples of four to reflect the political cycle.

**Q5 The Bill defines “Scottish emissions”, in relation to a greenhouse gas, as being emissions of that gas which are attributable to Scotland. The policy memorandum states that “Scottish emissions” are defined as being those greenhouse gases which are emitted in Scotland or which represent the Scottish share of emissions of gases from international aviation and international shipping.**

**What are your views on this definition of Scottish emissions?**

The Council accepts that the definition of Scottish emissions is to be based on source emissions due to the complexity of other emission accounting proposals. The Council is also supportive of the inclusion of international aviation and shipping emissions.

**Q6 The Scottish Government has indicated that initially it intends to seek independent, expert advice on climate change from the UK Committee on Climate Change. The Scottish Government states in the policy memorandum that if it determines that the UK Committee on Climate Change does not meet all the advice needed for Scotland, the Bill contains provisions which will allow the Scottish Government to establish a Scottish Committee on Climate Change or to designate an existing body to exercise these advisory functions.**

**What are your views on the Scottish Government’s approach to obtaining independent, expert advice on climate change?**

The Council agrees with the Scottish Government gaining expert advice from the UK Committee on Climate Change in the short term. However, it may be required to clarify when the Scottish Ministers intend to review the effectiveness of the advice from this Committee.

**Q7 The Bill places duties on the Scottish Government requiring that it reports regularly to the Scottish Parliament on Scotland’s emissions and on the progress being made towards the emissions reduction targets set in the Bill. The Bill sets out details of these reporting requirements.**

**What are your views on these proposed reporting arrangements?**

Aberdeen City Council would like to emphasise that the reporting mechanism regarding electricity generation should exclude any electricity generated from renewable sources for example Photo Voltaic or biomass CHP as this displaces electricity drawn from the grid or any electricity that feeds carbon neutral electricity into the grid. After all the aim is to report on electricity that adds to carbon emissions.

**Q12 The Bill requires the Scottish Government to produce an action plan setting out current and proposed measures to improve the energy efficiency of buildings in Scotland, as well as measures to encourage behavioural change.**

**What are your views on this proposal?**

Aberdeen City Council welcomes the proposed action plan but would like to see a commitment that Scottish Local Authorities will be given the lead responsibility for achieving carbon emission reduction in the domestic sector. This legislation will form the basis for the next stage in the Home Energy Conservation Act. The Council is aware that responsibility for this may fall to a non profit organisation such as the Energy Saving Trust, and are concerned that they may not be able to deliver.

**Q14 The Bill places a duty on the Scottish Government to take such steps as it consider appropriate to promote the use of heat from renewable sources. The Scottish Government has indicated this provision will enable it to introduce measures it deems appropriate to incentivise the production of heat from renewable sources.**

**What are your views on this proposal?**

The Council agrees with the proposal for renewable sources of heat however believe that the provision should be extended to incentivise the utilisation of waste heat even when it comes from non-renewable sources for example to heat buildings or greenhouses in market gardens. If this were included, waste heat from centralised electricity generation or from a range of industrial processes could be captured and used in district heating schemes in the short-term to displace other forms of space and water heating. That displacement would reduce carbon emissions and should therefore be included in the provision.

**Q15 The Bill sets out measures aimed at improving waste and recycling. The Bill gives powers to the Scottish Government to make regulations in the following areas:  
Waste prevention and management plans;**

**Waste data;**

**Deposit of recyclable waste;**

**Procurement of recycle;**

**Reduction of packaging;**

**Deposit and return schemes;**

**Charges for carrier bags.**

**What are your views on these proposals?**

Aberdeen City Council is fully supportive of measures to reduce waste and increase recycling as part of an integrated strategy to divert waste from landfill. Currently the Council is developing a Citywide Waste Strategy to deliver this.

**Reduction of packaging**

The Council agrees with the Policy Memorandum to reduce packaging, however feels that the duty should not primarily fall to retailers. Sufficient duties must also be put on producers to eliminate waste before it is produced in accordance with the Waste Hierarchy. Producers should be required to modify products to encourage refills, recycling and bulk buying.

**Deposit and return schemes**

Aberdeen City Council supports the provision to set up a statutory deposit and return scheme and has in the past written to the Cabinet Secretary to ask for appropriate legislation to be included in the Climate Change Bill. The Council believes deposit return schemes address many sustainability and waste management policy themes and reinforces the polluter pays principle.

From a Council perspective return and deposit schemes are encouraged as they not only reduce litter but they may also reduce the volume of waste that local authorities are required to handle, thus reducing costs. If such schemes are introduced to the Bill, the Council would lobby for any unclaimed deposit funding to be distributed proportionally to Local Authorities to be used for waste and climate change actions, as seen in similar schemes in California, USA.

**Charges for carrier bags**

Aberdeen City Council fully supports the introduction of charges for single use carrier bags and has in the past fully endorsed the introduction of a tax on single use plastic bags. The Council has been campaigning to reduce the environmental damage caused by plastic bags since 2003.

As a Council we offer re-useable jute bags for a small charge. Dog fouling collection bags are biodegradable and offered for sale. Similarly the bags intended for food waste collection are also biodegradable and made from cornstarch. Aberdeen EcoCity offers cloth bags as a giveaway to encourage reuse and sustainable shopping.

**Q16 What are your views on the adequacy of the Scottish Government's consultation in advance of publishing the Bill?**

The Council are happy with the consultation process.