

## Comments on the Climate Change Bill

I strongly welcome the introduction of the Scottish Climate Change Bill and the principles and objectives behind it. There is a clear opportunity to not only “think global” about the issue of climate change, but also to “act local” in introducing legislation to drive environmental issues in Scotland. In particular we are in a position to show an example to other countries of our commitment to reducing climate change in an effective and coordinated fashion.

I wish to be assured that the main features of the Bill are not diluted through the Committee stages and indeed there are areas which I would like to see strengthened or consolidated. I have noted these here:

**The long term targets** of at least an 80% reduction in all greenhouse gas emissions by 2050 and 50% for 2030 must remain as headline targets.

**Annual targets** to achieve the headline targets in 2030 and 2050 need to be at least a mandatory 3% year on year and starting in 2010. The existing targets in the Bill are not specific enough for the period up to 2020 and could result in a weakening of the programme. Evidence from SPICe research briefings show that annual targets of less than 3% from 2010 could seriously erode the Scottish headline targets.

**Emissions from international aviation and shipping** must be included in the targets. Ministers have made this commitment, yet the Bill indicates that emissions from international aviation and shipping will only be included after more consultation and legislation. The Bill should be amended to include all emissions.

**The setting up of a Scottish Climate Change Committee** is welcomed and this should be instituted immediately. It should be independent and contain a wide range of interests from the public, private, voluntary and community sectors. It should be given a key role in the scrutiny process for assessing progress towards headline and annual targets.

The suspicion exists **that excessive carbon trading** could dilute the real and practical efforts to reduce emissions in Scotland. The legislation should limit the amount that can be bought from overseas to 20%. A SPICe briefing paper indicates that there are installations based in Scotland who are already involved in the main existing emissions trading scheme (EU ETS). However, I understand that information from trading installations in Scotland is currently confidential. Steps are required to ensure these figures can be taken into account in monitoring.

The Bill contains **reporting mechanisms on progress on tackling emissions in Scotland**. These are essential in holding Ministers to account. Reporting should be in the public domain, with serious commitment to achievement of the targets set. The Scottish Climate Change Committee should be given powers in the reporting and scrutiny process.

**All policy documents and publicly funded projects** should be subject to scrutiny at the time of inception, possibly as part of Strategic or Local Environmental Assessments, to test for emission increase or potential for reduction. These should also be monitored and be subject to reporting and scrutiny.

All **public bodies** should have a duty to deliver the targets set out in this Bill from the start. Public bodies have a critical role to play in delivering the necessary emissions reductions and a there should be a duty within the Climate Change Bill to ensure they take the appropriate action to deliver their fair share. The public sector should demonstrate leadership.

The Bill should consider **sectoral reduction targets**, or at the very least, scrutiny of particular sectors from where heavy emissions are recognised. This need not be comprehensive, as some sectors are small or difficult to measure. Transport and energy are two which seem eminently suited to rigorous monitoring and scrutiny

On the **Forestry provisions**, it makes sense to seek ways of increasing woodland cover in Scotland and using land to foster renewable technology. I support the proposal for the Forestry Commission to work with developers, and particularly communities, to bring forward renewable energy development. Proposals to sell land and cutting rights to the private sector are not supported, but I would welcome joint-ventures over new planting schemes and renewable developments, so long as there are adequate safeguards over existing employment, land management and fostering public access to woodland areas

In progressing with the Climate Change legislation, **the context within which it operates must be considered**. In particular, the Scottish Government's National Performance Framework, Strategic Objectives, and National Outcomes provide the key to the Scottish Government's agenda to make Scotland a more successful country. The underlying physical, social and economic objectives are vital for Scotland to become a place which is wealthier, fairer, smarter, healthier, safer, stronger and greener. The Climate Change Bill should acknowledge its position in this wider context, so that actions and targets take into account the wider societal interests and sustainability.

Thank you for considering these comments. Now I am looking to the Scottish Parliament to deliver strong climate change legislation that must be implemented urgently.

Yours sincerely

Alexander Cook