

WRITTEN SUBMISSION FROM BAGGIT LIMITED

Submission to the Transport, Infrastructure and Climate Change Committee

CLIMATE CHANGE (SCOTLAND) BILL

In response to the calls for evidence on Questions 1 - 20 I submit the following for consideration.

OVERALL TARGETS

Question 1

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.

It is nigh impossible to achieve such unrealistic targets such as 50% and 80%. In order to get anywhere near those targets all air freight and air travel would need to come to a complete standstill thereby depleting our country of inward investment and as a consequence uncompetitive in world markets.

Question 2

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.

No government should set those unrealistic targets without the full and equal support of other countries.

Question 3

The Bill provides that from the year 2020, the annual emissions targets must be set so that each is at least 3% lower than the target for the previous year. Prior to 2020, the Scottish Government has indicated that it intends to set annual targets which build towards delivering emissions reductions of at least 3% each year.

It has been scientifically suggested that greenhouse gas emission will decline by a few percent but start to rise in 2010 so yet again this is an unrealistic target to set.

NET SCOTTISH EMISSIONS ACCOUNT

Question 4

The Bill introduces the concept of a "net Scottish emissions account" as a point of reference against which the target for reducing greenhouse gases can be measured. It is defined as the net Scottish emissions plus or minus any carbon units credited to or debited from the account. Any units purchased may be used to offset Scottish emissions. Any carbon units generated in Scotland and sold to customers outside Scotland, count as emissions made in Scotland.

No country should be allowed to buy and sell carbon units as this diminishes the whole point of the exercise.

Question 5

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.

Exactly the point I make in answer to Question 4.

SCOTTISH COMMITTEE ON CLIMATE CHANGE

Question 6

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.

Why are we extending Edinburgh Airport in order that it can take more aircraft?

REPORTING DUTIES

Question 7

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.

In order that figures are not in anyway massaged, reporting frequency should be set in stone.

DUTIES OF PUBLIC BODIES RELATING TO CLIMATE CHANGE

Question 8

The Bill contains powers to allow the Scottish Government, by regulations, to impose duties on public bodies in relation to climate change, to issue guidance to those bodies relating to their climate change duties and to require that they report upon the discharge of those duties.

No more quangos, we taxpayers already pay through the nose for what we have at the moment.

OTHER CLIMATE CHANGE PROVISIONS

ADAPTATION

Question 9

The Bill places a duty on the Scottish Government to produce a report for Scotland, setting out its objectives in relation to adaptation to climate change, proposals and policies for meeting them and the timescales within which they will be introduced.

As in answer to Question 8, far to many reports are delayed in order that figures can be massaged.

MUIRBURN

Question 10

Muirburn is the act of controlled burning of vegetation on open semi-natural habitats such as muir (Scottish word for moor) or moorland, and includes the burning of plants such as gorse, heather and grass. The Bill contains an enabling power to allow the Scottish Government to vary the permitted times during which muirburn may be made where they consider it necessary or expedient to do so in relation to climate change.

We already have in place, why do we need more powers to vary the times when Muirburn takes place, surely this can be done through common sense dialogue.

FORESTRY

Question 11

The Bill will allow modification by order of the functions of the Forestry Commissioners to enable the Forestry Commission in Scotland to play a greater role in tackling climate change. The

immediate intent of the Scottish Government is to take forward proposals relating to renewable energy development on the National Forest Estate and the release of capital from the National Forest Estate for woodland creation.

In other words, grow more trees. Do we really need more powers to do this.

ENERGY EFFICIENCY

Question 12

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.

Not before time, let's make a start with the Scottish Parliament Building which seems to think that energy grows on trees.

Question 13

The Bill confers powers on the Scottish Ministers to make regulations providing for the assessment of (a) the energy performance of non-domestic buildings; and (b) emissions of greenhouse gases produced or associated with such buildings. The provisions are enabling in nature and the Policy Memorandum provides further information on the Scottish Government's thinking in this area.

Will this mean an end to (a) the floodlighting of Edinburgh Castle and (b) an end to the fireworks display at Festival time. Just what we need to encourage tourism.

Question 14

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.

No more windfarms, which are not only costly and poor value for money, they are a blight on our countryside. We need to invest in wave power using the currents available in the Firth of Forth for example and to a certain extent we need to seriously ignore all the "green" factions and consider converting waste to energy.

WASTE REDUCTION AND RECYCLING

Question 15

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 recycleate;
- * Reduction of packaging;
- * Deposit and return schemes;
- * Charges for carrier bags.

I have forwarded a full and concise submission on this question which can be found on the [RAE Committee calls for evidence page](#).

GENERAL ISSUES

Question 16

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

Utterly disgraceful, given that the only specified consumer product within the Bill is carrier bags (it has yet to be defined what is meant by a carrier bag) not one single invitation has been sent out to anyone within this sector of the industry which is singled out for legislative powers.

Question 17

Do you have any views on the Strategic Environmental Assessment which was carried out by the Scottish Government on the consultation proposals?

No.

Question 18

Does the Bill raise any equalities issues you would wish to highlight?

The fact that no other bags other than carrier bags are included within the Bill is discriminatory under EU Legislation. Furthermore, any national agreement by retailers to charge a minimum price – *even one requested by the Government itself* – is likely in principle to be anti-competitive and would need to demonstrate it's exemption from the Competition Act to avoid the risk of a successful legal challenge.

Question 19

Do you have any comments on the impact of the Bill on sustainable development?

I refer to the answer at Question 14.

Question 20

Do you have any other comments on the Bill?

Scotland's Environmental and Rural Development Committee rejected proposals to introduce a charge for plastic carrier bags, Scotland's Rural Affairs and Environment Committee rejected proposals to introduce a charge for plastic carrier bags in 2008, both committees understood that to introduce a charge would increase not only waste in Scotland but increased emissions in Scotland. Section 59 contained within the Climate Change (Scotland) Bill should be removed.

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