

WRITTEN SUBMISSION FROM CHRISTIAN AID

Introduction

Christian Aid believes climate change is a social justice issue. Poor countries have done the least to contribute to climate change yet are suffering its effects, first and most severely. Moreover, climate change is threatening to undermine development gains and make poverty permanent.

We therefore welcome the introduction of the Climate Change (Scotland) Bill as an acknowledgement that developed countries need to lead the way in drastically reducing their carbon emissions if we are to secure an equitable global deal to avoid dangerous climate change.

Christian Aid believes the Scottish climate change bill has the potential to be the most ambitious climate legislation in the world and could pave the way for Scotland to demonstrate international leadership ahead of the UNFCCC talks in Copenhagen in December 2009. However, the bill needs to be strengthened in a number of areas which we have outlined in our response below.

Christian Aid is a member of Stop Climate Chaos Scotland. Stop Climate Chaos Scotland is a coalition of more than 30 organisations campaigning together to tackle climate change. The coalition members include environment and development NGOs, faith groups, trade unions, community councils, student societies, women's organisations, a mental health charity, and many others. In Scotland, the members have a combined supporter base of over 1.5 million people.

The Stop Climate Chaos Coalition Scotland priorities for the Climate Change (Scotland) Bill are that it must:

1. Set out a framework that will achieve *at least* an 80% reduction in greenhouse gas emissions by 2050.
2. Establish in statute annual emission reductions of *at least* 3% year-on-year from the start, not just from 2020, compatible with a fair and safe cumulative budget identified by the advisory body¹ (see 4).
3. Include emissions from all sectors in the framework and targets set out in the Bill, including those from international aviation and shipping, from the very start.
4. Establish a Scottish advisory body, a Scottish Climate Change Commission, in the primary legislation to support delivery of the Bill when it is enacted.
5. Ensure that at least 80% of the effort to cut emissions takes place in Scotland.
6. Establish duties on all public bodies to reduce greenhouse gas emissions in line with the national target.
7. Set in place robust, transparent reporting measures so the Scottish Parliament is well informed on progress in meeting targets and Government is held to account on mitigation and adaptation.
8. Ensure that strong enforcement measures are set in place in statute.
9. Ensure Scotland counts all its emissions and reports on those produced by products and services we consume as well as emissions produced domestically.
10. Be explicit that sustainable development is core to the purpose and delivery of the statute in relation to mitigation and adaptation

¹ While Christian Aid supports the Stop Climate Coalition Scotland position in relation to annual reduction of at least 3%, we believe more ambitious annual reductions of at least 4% are needed to increase our chances of avoiding dangerous climate change. See response to questions 1 and 2 for further details.

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?

Christian Aid welcomes the target in the bill to reduce emissions from all greenhouse gases by 80% by 2050. It is widely agreed that to keep below a 2°C rise and avoid dangerous climate change, global emissions reductions of at least 80% by 2020 are essential.

However, the emission reductions pathway to reach 2050 target, and thus the cumulative emissions between now and 2050, are as important as the target itself. According to IPPR¹, global emissions need to peak between 2010 and 2013, and then decline at an annual rate of at least 4% by 2015-2020², if we are to have a 'very low to low risk' of exceeding the 2°C threshold. The current bill requirement that, between 2010 and 2019, Scotland's emissions must be less than the previous year is therefore inadequate. If Scotland is to contribute its fair share of the global effort required to keep below the 2°C, the bill should set annual targets to cut emission reductions by at least 4% from the outset.

Christian Aid believes it would make more sense for the bill's interim target to be set at 2020, in line with the interim targets of the UK and the European Union, rather than at 2030. In addition, to meet the need for early and deep cuts as outlined above, Christian Aid believes the interim target should be to cut emissions by 50% by 2020.

Once the temperature increases above 2°C, scientists say the risk of exceeding 'tipping points' where global warming will become catastrophic and irrevocable will dramatically increase. This would mean up to 1-3 billion people will face water shortages, millions will go hungry, and tens of millions could be at risk as diseases such as malaria spread. If the aim of the bill is for Scotland to contribute its fair share towards avoiding dangerous climate change this aim should be made explicit in the long title of the bill.

Q.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.

What are your views on the proposals in the Bill relating to the net Scottish emissions account, and should there be a limit on the number of carbon units which Scotland can purchase?

Christian Aid believes it is disingenuous to refer to a **Scottish** net emissions account unless a figure is put on how much of the bill's reduction target is met through domestic effort i.e. emission reductions that are made in Scotland.

As it stands, the bill allows for an unlimited level of carbon credits to be purchased to meet the emission reduction targets. For reasons of global equity and international leadership, Christian Aid believes the at least 80% of the effort to meet the bill's targets should take place in Scotland and not be 'bought in' from other countries.

Global equity

To avoid dangerous climate change, not only do all countries need to reduce their emissions by 80% by 2050 but **industrialised countries need to lead the way in making deep, rapid cuts**. A transition to low-carbon development in developing countries (*through mitigations funds of the UNFCCC*), needs to happen *in addition to* and not instead of, emission reductions in wealthy nations such as the UK.

Developing countries have contributed the least to climate change, are disproportionately suffering its effects and are the least able to finance mitigation and adaptation. In contrast, industrialised nations like Scotland, which bear the historical responsibility for climate change, have the greatest capacity to reduce their emissions to deliver an equitable global solution to the problem. The overall objective of the Bill must therefore be to guide Scotland to a low carbon economy and not to simply set targets which can be met by paying others to cut their emissions.

Quality of credits

In addition, Christian Aid has serious concerns about the quality of carbon credits generated outside the EU. It is questionable whether some of the projects from which carbon credits are generated are truly 'additional' (ie, delivering emission reductions which would not otherwise have occurred) or contribute to sustainable development in the host country. Moreover, there is evidence to suggest that some "offsetting" projects have produced substantial social and environmental harm.

Therefore, if the bill allows for the purchase of carbon credits, it should specify the criteria that will be applied to ensure they are truly additional, purchased from projects, which have been certified as making a measurable, reportable and verifiable contribution to sustainable development, and benefiting the local community.

International leadership

Placing a requirement in the Bill, that limits the proportion of emission reductions bought in from elsewhere, would make Scotland the first industrialised nation to demonstrate its willingness to make deep cuts at home. This would place Scotland at the forefront of generating greater trust and confidence, particularly amongst developing countries, which is desperately needed in advance of the international talks in Copenhagen in December 2009.

Incentivising the traded sector

Stating in the bill that at least 80% of the emission cuts is met through domestic effort is entirely compatible with the operation of the European Union's Emissions Trading Scheme (ETS). The ETS is a potentially valuable mechanism but both Stern and Turner have acknowledged it will not in itself deliver the required cuts in the timescale required, nor drive investment in a renewable power sector. The traded sector in Scotland accounts for approximately 50% of Scotland's emissions and includes the power sector which is critical to the delivery of a low-carbon economy. The traded sector can therefore make a significant contribution to meeting the bill's targets.

It has been suggested that because emissions from the traded sector are fixed by the number of allowances allocated through the ETS scheme, there is no reason to focus on these sectors. Followed through to its logical conclusion that would mean there would be no point in using available policy levers to reduce emissions from the electricity sector, such as energy efficiency measures or support for renewables.

It has also been argued that if the ETS sectors in Scotland reduced their emissions below the scheme's cap that would only shift the emissions elsewhere in Europe through the sale of credits. Christian Aid acknowledges this argument but believes it is preferable that the ETS sector in Scotland is incentivised to show leadership by demonstrating how early deep reductions can be made at home and thus, the capacity for the ETS cap to be tightened.

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?

Christian Aid supports the inclusion of Scotland's share of emissions from international aviation and shipping in the definition of Scottish emissions. We would like to see these emissions included in the primary legislation but allow for the methodology used to calculate these emissions to be revised in the future (through secondary legislation) in line with international reporting methods.

Christian Aid would also like to see a commitment in the bill to regular reporting on the emissions produced elsewhere that result from consumption in Scotland. By reporting on consumption, the Scottish Government would be able to identify appropriate levers to address all emissions arising from the behaviour of individuals in Scotland. Such reporting would also encourage individuals to address their behaviour and consumption to make a contribution towards reducing global 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?

Christian Aid would want to ensure that the body advising on the bill's targets has sufficient expertise to understand the impact of climate change on vulnerable communities around the world and a comprehensive understanding of the policy levers available in Scotland to bring about early deep cuts in emissions.

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?

Christian Aid believes that in order that the targets set out in the bill are met and that Scotland makes its fair contribution towards avoiding dangerous climate change, there must be robust reporting arrangements that are transparent and accountable.

Q19 Do you have any comments on the impact of the Bill on sustainable development?

The bill sets out a framework to reduce greenhouse gases. However, it is important that the reductions in greenhouse gases are not achieved by undermining the long-term sustainability of vulnerable communities. For example, one of the solutions that has been sought to cut emissions in rich countries is substituting biofuels for oil. This "solution" will need vast tracts of land for plantations, leading to biodiversity loss, food insecurity, conflict, and the forced ejection of millions of rural and peasant farmers from their lands.

As Christian Aid does not wish to see the targets in the bill met at the expense of vulnerable communities, it strongly supports a general duty on sustainable development in the bill.

Q20 Do you have any other comments on the Bill?

It has been suggested that there is a contradiction in the positions advocated by international development agencies in pushing for deep cuts in emissions and promoting fair trade from developing countries. However, this suggestion is a red herring as it is rich countries that dominate international trade and between which the majority of goods are exchanged. For example, the International Institute for Environment and Development has stated that the total emissions associated with the export of fruit and vegetables from Africa is the equivalent of 0.1% of the UK's total emissions. Moreover, local or regional trade does not necessarily incur more emissions than international trade. Growing flowers in Kenya and flying them to the UK can be less than a fifth of those grown in heated and lighted greenhouses in Holland.

ⁱ High Stakes: Designing emissions pathways to reduce the risk of dangerous climate change IPPR 2006