

WRITTEN SUBMISSION FROM FIRST GROUP

FirstGroup plc is the largest bus and rail operator in the UK. We are therefore ideally placed to work with the Scottish Government to deliver carbon reductions from the transport sector. The Confederation of Passenger Transport has indicated in their response the opportunities from bus and light rail services. The Sustainable Rail Programme has produced a number of documents setting out the case for rail. In developing their strategy to deliver the carbon reduction targets proposed in the Bill we would encourage the Scottish Government to work with the industry to promote modal shift through partnership working and measures to support investment in emerging transport technologies.

In relation to the questions outlined by the Transport, Infrastructure and Climate Change Committee we would provide the following observations.

We have no particular comments to make in relation to the long-term targets. We agree that interim targets will need to be established in batches as it is difficult to project beyond a certain timeframe. We are unsure as to the wisdom of setting 3% year on year reductions unless there is a clear strategy by which such annual reductions can be achieved. Our own carbon projections show relatively small gains in the short term becoming greater over time as technology develops and becomes more commercially available.

This approach should not, however, override the need to act now in particular in relation to promoting behaviour change whereby we can achieve the most significant reductions in the short-term.

We understand the Scottish Government's rationale in relation to establishing a Committee for Climate Change. It is, however, important that climate change is addressed in line with other broader sustainability goals as, for example, those set out for transport by the Department for Transport in "Towards a Sustainable Transport System". We appreciate this does not apply to Scotland but the document illustrates the need to consider climate change within a broader social context if we are to deliver a truly sustainable transport network.

Within this context we also consider it important that independent, expert advisors on climate change maintain an overview of the broader sustainability agenda and ensure their advice does not conflict with this.

We support the need for reporting duties and the powers for regulation to impose duties on public bodies in relation to climate change.

Overall the Bill appears to provide an appropriate framework for driving greenhouse gas emission reductions in Scotland. The challenge moving forward will be to develop the appropriate strategies and action plans to deliver the carbon savings required and we look forward to being involved in that process in relation to the transport sector.