

## WRITTEN SUBMISSION FROM GLASGOW CITY COUNCIL

In 2008 the Scottish Government consulted on its proposals for a Scottish climate change bill. Glasgow City Council's approved response was submitted at that time. On December 4th 2008, the Climate Change (Scotland) Bill was introduced in the Scottish Parliament.

Glasgow City Council's response to the questions raised in the 'call for views':

**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?**

We welcome the proposal. It is essential that the Scottish Climate Change Bill establishes a statutory target for at least an 80% reduction of greenhouse gases in Scotland by 2050, following the Kyoto Protocol basket of six gases and the target suggested by Intergovernmental Panel on Climate Change for Developed Countries (80%).

**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 action taken in the next few years is crucial to the progress in tackling climate change. Therefore statutory annual targets would appear to be more efficient in achieving the 50% target in 2030 and 80% in 2050. With the multiyear target, there is a risk that early inaction may compromise further progress and achievement of interim and long term targets.

**Q3 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.**

**What are your views on this approach or any possible alternative approaches?**

To achieve both the 2030 and 2050 targets, the bill must establish year-on-year reduction targets of at least 3% from the start. This will also ensure that Scotland fulfills its aspiration of providing an example of good practice to other countries.

**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?**

It is suggested that the priority of the Bill is to establish domestic emissions in Scotland and that international emissions credits are kept to a capped minimum.

**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 definition appears to be fairly comprehensive and robust. The inclusion of emissions resulting from shipping and aviation is a valuable measure.

**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 use initially of the UK Committee on Climate Change is supported. If necessary in the longer term would appear that the existing bodies, e.g. SEPA, SNH, could advise, monitor and scrutinise the implementation of the Bill.

**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?**

The statutory reports are welcome; those will ensure clear and concise monitoring of the process and actions being taken.

**Q8** 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.

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

Those measures are welcomed to ensure the action of public bodies is in line with national measures; however this can only be done with adequate funding support as well as guidance and capacity building.

**Q9** 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.

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

This action is welcome. Adaptation is an essential complement to mitigation action against climate change, rooting it in the bill will ensure that it will not be undermined.

**Q10** 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.

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

This proposal is welcome. The muirburn season has already been changed by the Welsh Assembly and DEFRA to adapt to climate change, prevent soil erosion and water pollution. There should be an introduction of even stricter regulations concerning heather muirburn, particularly on blanket bogs, to prevent significant release of carbon through peat erosion.

**Q11** 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.

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

The proposal is welcome. The forestry plays a key role in addressing climate change both by absorbing carbon dioxide from the atmosphere and storing it in growing vegetation and soil, and as a sustainable source of wood – an alternative and less polluting energy source to fossil fuels, and a low-energy construction material. The planting strategy should aim to achieve a sustainable balance between the planting of exotic conifers for fast carbon uptake and native hardwoods for longer term capture and biodiversity gain.

**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 behavioral change.

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

It is a very relevant proposal. As the Stern Review indicates, by 2050, energy efficiency has the potential to be the biggest single source of emissions savings in the energy sector. The most cost effective way of reducing emissions is to use energy more efficiently. It can also improve productivity and can contribute to the security of energy supplies by reducing reliance on imported energy and ensuring maximum usage of energy resources.

Education is the key to promote behavioral changes, since these occur when attitudes change and for this to happen, individuals and groups have to be educated about the consequences of their actions to them and others, as well as alternative actions and their advantages.

**Q13** 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.

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

It is a relevant and welcome approach. Non domestic buildings are significant users of energy and producers of greenhouse gases emissions. Action to reduce carbon emissions will be needed in every sector of the economy, but clearly we need to focus first on the areas where we can make the most impact for the least cost. Most measures relating to buildings, such as retro-fitted wall and roof insulation, and use of condensing boilers, will actually save money - as well as saving carbon.

**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?**

A significant amount of the final energy consumed in the Scotland is in the form of heat, the generation of which accounts for a great part of the national CO2 emissions.

The investment in renewable sources of heat such as biomass, micro generation and heat from waste will certainly have a positive impact in mitigating against climate change, while preventing fuel poverty.

**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 recyclate;**

**Reduction of packaging;**

**Deposit and return schemes;**

**Charges for carrier bags.**

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

These proposals are extremely relevant, given that waste is a growing problem, and its appropriate disposal is a central part of the work to reduce the effects of climate change because of the impact it has on the production of Greenhouse gases. Landfill sites are fast filling up, and combined with the resulting greenhouse gases they create, the amount of waste produced and the way it is treated waste needs to be re-evaluated.

However such proposals need to be considered in light of the Scottish Government's Zero Waste Policy and in the context of the revision of the National Waste Plan, which is due out for consultation in 2009. The Policy and Plan will allow a more formal consideration of the benefits and necessity of these proposed actions.

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

Adequate.

**Q17** Do you have any views on the Strategic Environmental Assessment which was carried out by the Scottish Government out on the consultation proposals?

No.

**Q18** Does the Bill raise any equalities issues you would wish to highlight?

No.

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

No.

**Q20** Do you have any other comments on the Bill?

No.