

WRITTEN SUBMISSION FROM GORDON WILSON

Dear Convener of the TICC Committee

I would be grateful if you and your Committee would consider my views in relation to the Climate Change (Scotland) Bill.

2009 is a critical year for climate change, as internationally we seek to create a new global deal to tackle this massive threat to our planet, and here in Scotland there is a huge opportunity to enact the most progressive climate change legislation in the world.

Issues on which the Committee is seeking views:

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?

1. I am very seriously concerned that the '80% target by 2050 is inadequate.

It seems to generally accepted now that we must not go beyond a threshold of 2 degrees of warming above 1990 levels in order to avoid 'dangerous' warming.

This target is based on a stabilisation level of 450ppm-500ppm. IPCC 2007 shows that this is not guaranteed to keep global temperatures below a 2 degrees increase. It gives only a 50:50 chance.

In a 2007 paper written by James Hansen of NASA in the Philosophical Transactions of the Royal Society, it says we cannot go beyond **1.5 to 1.7** degrees of warming above 1990 levels.

The speed of ice melt has been underestimated by the IPCC and the loss of reflection (albedo) from the poles will add further to warming.

He also states that 'If you leave us at 450ppm for long enough it will probably melt all the ice - that's a sea rise of 75 metres. What we have found is that the target we have all been aiming for is a disaster - a guaranteed disaster' (Guardian).

His suggested safe stabilisation level is 350ppm which means a considerably more serious target. I have not been able to calculate the appropriate target but George Monbiot has recently suggested a cut of 25% by 2012. This indicates that an appropriate target would be much more serious and underlines the importance of early cuts.

<http://www.monbiot.com/archives/2008/12/02/whistling-in-the-wind/>

There is a website relating to 350ppm here <http://holyrood350.org/>

Though I appreciate this is a very difficult problem, particularly in a democratic system, we absolutely must avoid runaway climate change because the human and economic costs are immeasurably more serious than economic and political concerns about measures to avoid it. By the time most of the electorate are convinced of this, it will be too late to do anything about it.

2. Secondly as the NGOs say, **the Interim target** is a useful milestone in principle, but the 2030 target set is not on the trajectory that would have been achieved with at least 3% emission reduction targets annually from the start. This would have meant a 60% rather than 50% reduction by 2030, significant in terms of what needs to be achieved.

It is a more inadequate target within an inadequate target. Furthermore, early cuts are more valuable in terms of reducing climate change because climate change is accelerating due to positive feedbacks. The melting ice and loss of albedo is just one of these.

3. We must take into account ALL of Scotland's emissions. International aviation is the fastest growing source of climate change emissions. If it is excluded, and passenger numbers grow as predicted, research carried out by the World Development Movement shows that aviation in Scotland will account for more than 100% of our 2050 greenhouse gas allowance, making a mockery of emissions reductions achieved in other sectors.

There is no problem determining which emissions are Scottish. There is no need for alignment/ agreement with the UK bill because Scottish emissions from aviation and shipping are known. We know what we are responsible for so we can include it in the Scottish bill.

In principle you just have to add up half the emissions from every journey to and from Scotland.

What can Scotland do to reduce these emissions?

As a nation, we could do more to promote tourism within Scotland, encourage people to holiday at home and reduce demand for flights outside the country. This would not just be of benefit in terms of emissions reduction, but of benefit to Scotland's economy and heritage as well.

Scotland has policy levers to promote and encourage use of other methods of transport such as train links to the major cities across the UK and Europe. By using Scotland's planning powers to rule out future runway expansion and airport infrastructure, the Scottish Government can play a key role in curbing the growth in demand to more sustainable levels. http://assets.wwf.org.uk/downloads/scottish_climate_change_bill_briefing_3_aviation_shipping.pdf

4. Lastly there must be no carbon trading, they must be all be Scottish emissions.

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?

in early years, targets must be absolutely strict - at least 3% and any overshoot should not be taken to reduce the requirement in other years. Early cuts will be more effective than later ones.

This should only be relaxed in later years if the massive cuts have been achieved in earlier years and then current science indicates that this is reasonable (which is highly unlikely).

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?

WWF Scotland state 'the time for action must be now, so the Bill must require at least 3% annual reductions in emissions year-on-year (in line with the SNP Manifesto commitment), starting immediately and not just in ten years time. Delaying a requirement for at least 3% reductions in emissions until 2020 means action will be too late.'

A report for the Australian government last year states that the developed nations including Britain, the US and Australia, would have to slash carbon dioxide emissions by 5% each year over the next decade to hit the 450ppm target.

There is an objection that winters could be cold or mild and summers mild or hot, which makes it difficult to keep to statutory annual targets, and consequently we should allow average targets of 3%.

In answer to this I would say that, in early years, targets must be absolutely strict - at least 3% and any overshoot should not be taken to reduce the requirement in other years. Early cuts will be more effective than later ones.

This should only be relaxed in later years if the massive cuts have been achieved in earlier years and then current science indicates that this is reasonable (which is highly unlikely).

To overcome this difficulty about winters and summers, the target should be sufficiently in excess of 3% in order to absolutely guarantee a minimum of 3 %.

This is necessary in order to ensure the target of at least 80% by 2050 is reached. The bill is meaningful if its terms ensure the target of at least 80% reduction by 2050 is achieved. An exact or average 3% reduction a year would not achieve the target. Targets must be achieved - not just set.

The important thing about the target is the reduction in total emissions. The target assumes a steady reduction in emissions

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?

Scotland counts all emissions, including consumption based emissions. All emissions that we are responsible for should be considered - including those made in another country when goods are produced but are then exported to Scotland.

No carbon trading should be permitted at all. No buying emissions from overseas. This is vital if the Bill is to ensure Scotland benefits from real domestic emissions reduction and does its fair share to tackle climate change

The Observer Sunday 18 January 2009

Plans to include carbon trading schemes in talks about future climate agreements were a desperate error, he said. "It's just greenwash. I would rather the forthcoming Copenhagen climate talks fail than we agree to a bad deal," Hansen said. Only a carbon tax, agreed by the west and then imposed on the rest of the world through political pressure and trade tariffs, would succeed in the now-desperate task of stopping the rise of emissions, he argued. This tax would be imposed on oil corporations and gas companies and would specifically raise the prices of fuels across the globe, making their use less attractive. In addition, the mining of coal - by far the worst emitter of carbon dioxide - would be phased out entirely along with coal-burning power plants.

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?

Scotland counts all its emissions. As well as direct emissions we should also be reporting on consumption-based emissions - those arising in another country when they produce the goods that we buy.

Ministers have made the commitment to include international aviation and shipping emissions in the targets from the start, but the Bill says emissions from international aviation and shipping will only be included after more consultation and legislation. The Bill should be absolutely clear that all emissions have to be included from the start.

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?

It is welcome that the Bill does make provision for a Scottish advisory body on climate change, that is able to advise and steer progress in Scotland with an awareness of Scottish policy, institutional, geographical, social and economic context. A Scottish body is needed now, not some time in the future. The independence of this body and ability to inform and support Parliament need consideration - a Commission model as proposed by Stop Climate Chaos may be more appropriate.

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?

Robust reporting to help Parliament hold Scottish Ministers and Government to account. The spirit of the Bill is good, but the mechanisms and processes need to be strong, transparent and ensure accountability, with scrutiny always in the public domain.

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?

All public bodies 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 duty within the Climate Change Bill would ensure they take the appropriate action to deliver their fair share.

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?

Stop Muirburn completely

Grouse-shooting popularity boosts global warming - New Scientist 12 August 2006 by Fred Pearce:

"In terms of carbon storage, the moors can be thought of as Britain's rainforests," says Adrian Yallop, an ecologist at Cranfield University in Bedfordshire. Yet gamekeepers are burning the moors at an unprecedented rate to encourage the growth of heather, a prime habitat for grouse. The burning threatens to release billions of tonnes of carbon locked into the peat bogs underpinning the moors. "Where burning occurs, the hydrology changes and the peat is open to decomposition and erosion. This strips the moor of carbon as surely as setting fire to the Amazon forest,"

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.

What are your views on this proposal?

These should include measures firstly to stop leaks of hydrofluorocarbon coolant from air conditioning and secondly stop the use of this as soon as possible as it has 2000 the capacity of CO2 for global warming

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

Dealing with climate change must take precedence over development. The present situation is clearly so far from sustainable as to make discussion of 'sustainable development' pointless.

We have to move quickly to a way of life that addresses climate change. This is not compatible with economic development. We need economic retreat.

Do you have any other comments on the Bill?

Climate change science by definition a changing situation and it takes too long to prepare the scientific and papers and IPCC reports and too long for governments to act on them when they emerge. The IPCC last report in 2007 on which the bill is based uses papers going back to 2004. Our response to climate change must take changing situation into account and our targets should involve all sectors and keep up to date with present science and allow an adequate margin for error. We cannot wait for adequate action any longer.

Aside from targets, government must urgently go through every area of government policy and cut emissions as the highest priority. It is critically important not to wait for international agreements.

Even made as strong as possible in its detail this bill is inadequate.

I suggest you need a coalition government (advised by climate scientists) as in the 2nd world war to take electorally unpopular action to seriously address climate change.

Also required are population control measures, as civilised and equitable as possible. Jonathon Porritt sensibly suggests do not have more than 2 children. Measures must not unfairly affect the less well off.

Please also look at <http://holyrood350.org/>

I am willing to play my part in reducing emissions and believe Scotland can lead the way in tackling climate change. Now I am looking to the Scottish Parliament to deliver strong climate change legislation that must be implemented urgently, could be the best in the world and could be a blueprint for other developed nations.

Yours sincerely
Gordon Wilson