

WRITTEN SUBMISSION FROM GREEN GROUP CITY OF EDINBURGH COUNCIL

**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 believe the 2050 reduction target should be 90% by 2050 from 1990 levels to meet reduction in CO2 necessary to reduce to possibility of runaway climate change (see Tyndall Centre for Climate Research).

The interim target is a good idea in principle, but we have suggested that the 2030 target would be better set at 2020 as this would tie in with dates set in other international agreements and the UK Act.

In relation to the level of the reduction target, WWF figures state that the original manifesto commitment of 3% annual reduction targets would result in a 45% reduction by 2020 and a 60% reduction by 2030. Therefore, the interim target as it is currently set, would not deliver the required trajectory.

**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?**

Only statutory annual reduction targets set so as to achieve 90% reductions by 2050 are acceptable.

We suggest that carbon budgets should be of four years in length to run alongside a Parliamentary term to ensure accountability, and that these budgets should be set two to three years in advance.

**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?**

This approach is wholly inadequate. There must be a statutory requirement for equal annual reductions starting from 2010, that are set to achieve 90% reductions by 2050. Likely to be about 4% per annum.

**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?**

The objective of this Bill should be firmly fixed on directly reducing the emissions which arise in Scotland. Therefore, there should be a limit on the number of international carbon credits Scotland uses to meet its annual targets. Stop Climate Chaos Scotland suggests the absolute minimum of reductions should be met through the purchase of carbon credits, a figure of 20% has been suggested by the NGOs.

**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?**

Emissions from international aviation and shipping **must** be included in the definition of ‘Scottish Emissions’. We welcome the shift in the Bill which moved towards their inclusion.

**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?**

Independent, expert advice is essential. In the SGP consultation response we supported the proposal to make use of the UK Committee on Climate Change in the short term. If a Scottish body were to take on this role it should be a new body with a remit explicitly focused on climate change. One problem with the current proposals is that Ministers, not Parliament, would appoint the Members of this new committee, which reduced its independence and credibility. It should be noted that the NGO responses were overwhelmingly in favour of establishing a new Scottish Climate Change Committee.

**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?**

Our main concern with this section lies in the lack of sanctions and accountability. The Bill currently contains no consequences for Ministers who miss their targets. Given that they are responsible for their success or failure, Ministers need to know what will happen if they fail.

**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?**

We believe it is important duties are placed on public bodies in relation to reducing their emissions.

Local authorities in particular are key to delivering reductions in emissions. Guidance, support and sufficient finance from central government are crucial if LAs are to play their part.

**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?**

It will be impossible to 'adapt' to many of the predicted global impacts of climate change such as global food shortages or impacts on the Scottish economy such as from a collapse in tourism. This is why efforts must be focused on reducing our emissions and demanding that other countries to do the same.

**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?**

No submission.

**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?**

No submission.

**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 behavioural change.

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

This requirement is welcome as energy efficiency can be a rapid and cost effective way of reducing emissions. The recent Scottish Government report on Low Carbon Buildings contained much to be welcomed. However significant levels of Government investment will also be required to achieve the potential for energy efficiency in older buildings.

**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?**

These provisions are welcome. The non-domestic sector represents a significant proportion of the built environment and therefore will have to be included to achieve even the 80% reductions currently proposed by government.

**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?**

As a major proportion of energy demand is for heat it is vital that heat be generated from non-fossil fuel, renewable sources and that a scheme, such as ROCs for renewable electricity, to encourage this switch by the energy providers is developed.

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

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

The handling and treatment of waste generates significant emissions. There is an opportunity to reduce this impact through waste minimisation.

Energy from waste is not a sustainable way of generating electricity. As well as generating CO<sub>2</sub>, emissions, incineration burns useful resources that could otherwise be conserved or recycled.

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

No submission.

**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 submission.

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

No submission.

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

If the provisions of the Bill are successful in starting to achieve the required reductions in carbon emissions, this will start us on the road to sustainable development.

Without a shift to non-fossil fuel based sources of energy and a reduction in climate changing emissions, development cannot be regarded as sustainable development. The bill is therefore absolutely key to achieving this aim.

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

Climate change threatens the lives of everyone but its impacts can be reduced if greenhouse gas emissions are reduced sufficiently quickly. At present plans to reduce emissions globally are not sufficient to prevent runaway climate change. The UN negotiations in Denmark later this year may be the last chance to secure global agreement on reductions and avert catastrophe. It is therefore imperative that Scotland joins other countries in showing global leadership if there is any possibility of getting the non-industrialised world to cut greenhouse gas emissions sufficiently to avoid runaway climate change. This bill is our flagship climate change policy and is a vital piece of legislation. The Scottish Government must ensure that it is not only the best climate legislation in the world but that it does what it says on the tin. Presently, the lack of early targets is undermines the Bill.