

WRITTEN SUBMISSION FROM RENFREWSHIRE 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?

The 2050 target and 2030 interim targets being proposed for the reduction in greenhouse gas emissions are achievable, but challenging, and will require a strategic plan to achieve this aim.

Strategic changes would include progression with renewable power projects, transportation plans and strategies, low carbon and high energy efficient Buildings, shared use of resources, partnership working, and increasing public general awareness.

To fund the investment needed to achieve the target reductions it is recommended that the Scottish Parliament will need to consider the availability of investment and the resources required to achieve these targets and whilst much investment has been undertaken by the Council in this area already, a higher level of funding will be necessary.

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 setting of achievable annual performance targets in batches between 2010 and 2022 is welcomed and good practice, as is the reporting of progress towards achievement of annual targets, for years 2030 and 2050, but this has resource implications across the Council which will need to be considered. The reporting periods are recommended as bi-annual between 2010 and 2022 to allow sufficient time for measurable progress to be recorded. A number of local Performance Indicators may be necessary to record progress across the Council and it is suggested this information be reported and monitored through the existing Sustainable Development Working Group which is a cross cutting group with individual work tasks assigned to Service Departments.

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?

The proposed annual emission target reductions of 3% is a positive but challenging target to set and whilst generally supportive of this, it must be progressed as part of a strategic plan. This plan should contain actions which will lead to measurable energy efficiency savings and whilst these actions will lead to improvements there will be additional costs associated with procurement and provision.

Annual targets will need to reflect the baseline year (1990) for each gas type and recognition for improvements already achieved or in progress.

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 net amount of Scottish emissions is a useful starting point of reference with which the target for reducing greenhouse gases can be measured. The amount of units that emissions that can be credited or debited can vary, carbon units can be bought or sold however there should be a limit to the extent this can be done, if real progress is to be achieved. Containing demand for increasing energy consumption will be challenging, driven by change and increasing community aspirations in many areas.

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?

Scottish greenhouse gas emissions attributable to Scotland or those which represent the Scottish share of emissions from international aviation and international shipping require further definition by Scottish Ministers to enable an accurate picture for Scotland to be established at the outset, and to define how and whether these elements can be properly included, and the ability to influence external commercial entities in the medium to long term. Further information is being sought regarding how this process would be operated including items such as carbon offsetting measures and measurable targets apportioned to Renfrewshire. Renfrewshire as home to Glasgow International Airport should not be disadvantaged by the airport’s location by having additional emissions attributable to Renfrewshire.

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?

Whilst the use of independent expert advice for Scotland in addition to the advice provided by the UK committee on Climate Change is to be welcomed. Any additional actions from this advice would need to be aligned to UK advice. The impact and measures of this should be that it does not unduly put Scotland at a disadvantage compared to the UK as a whole and any advice should be tailored to Climate Change as it affects Scotland.

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?

Reporting requirements are fully supported and it is anticipated that all Scottish Local Authorities would follow existing corporate reporting mechanisms on performance. There will also need to be sufficient resources across the council to co-ordinate and undertake this task. It is further anticipated that individual Service Departments across the Council would be allocated tasks and undertake performance reporting, consistent for their area of responsibility.

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?

The requirement of local authorities to undertake regulatory functions regarding Climate Change duties is supported. It is anticipate these will follow existing corporate requirements. Further implications of this requirement include increased joint working with partners and public bodies.

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?

Whilst the general proposal for adaptations are welcomed, planning considerations for identified areas of risk due to Climate Change should be subject to regulatory controls and to address the effects of Climate Change

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?

The proposed controls through the bill are to be supported to enable control and improvement in Climate Change.

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 immediate intent of the legislation is to take forward proposals to allow the Forestry Commission to enter into joint ventures for:

- Renewable energy development and,
- To allow them to let timber cutting rights to fund Climate Change activity.

Both of these proposals could have significant planning and environmental implications. The Council would be supportive of these types of project and could work with the Forestry Commission to reduce the emissions of greenhouse gasses.

Recognition should be given, however, to the significant environmental impacts that tree felling and planting can have on biodiversity, landscape, nature conservation and archaeology unless it is carefully managed.

Similarly, realising the untapped potential wind and hydro renewable energy schemes on the forest estate will have to be achieved in a sensitive manner that respects the environment. Public access may also be affected by these types of development.

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?

The bills proposal for production of an action plan which should be strategic in nature to improve the energy efficiency of buildings is supported. Resource implications for continued progress need to be considered for buildings and the proposed implementation of an action plan should be supported by advice on cases of best practice, and benchmarking to encourage behavioural change.

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?

The proposals for the Scottish Ministers to make regulations to the energy performance of buildings is to be welcomed and will be a driver for change

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?

Whilst the proposals for renewable sources are to be welcomed, a more direct approach is thought necessary to encourage greater use of bio-mass heat sources as it is an efficient method of reducing CO² emissions. There are issues which must be addressed centrally regarding the production of bio-mass crops used to create fuel. The use of locally produced bio-mass crops should be encouraged to reduce the transport CO² emissions.

The additional capital cost of installing a biomass heating plant must be offset against long term competitive biomass fuel prices and it will be important that the costs of biomass fuels are controlled centrally.

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 Council's views are to support these proposals and the undernoted identifies the Council's progress to date regarding these matters.

- **Waste prevention and management plans:**
"Development of plans for the prevention, reduction, management, recycling and disposal of waste" Management, recycling and disposal of waste are already underway to comply with the Landfill (Scotland) regulations (in response to Landfill directive).
Scotland's new National Waste Plan is currently being prepared by the Scottish Government to replace original National Waste Plan and Area Waste Plans Waste however Wastes Minimisation legislation is unlikely to be enacted in the short term. The European Waste Framework directive (17th June 2008) delays the introduction of this type of legislation until 2014.
When enacting legislation clarity should be provided on the exact role of the enforcement agency; SEPA, Local Authorities and other agencies.
Additional resources & training should be provided in relation to the duties imposed.
If Local Authorities are required to implement local Waste Management Plans resources & training should be provided.
- **Waste data:**
Information on municipal waste is already provided through SEPA waste data flow to comply with Landfill (Scotland) regulations. Resources and procedures are already in place to comply with European legislation. Comprehensive data is available at present. Any additional information could be provided (dependant on individual local authority management systems.)
- **Deposit of recyclable waste:**
A comprehensive network of facilities is currently provided and there would be scope for additional facilities but practical considerations such as additional space at Civic Amenity sites or other places to accommodate containers for additional materials. Planning permission would be required at site facilities in high density areas and Town Centres. Ability to engage with other stakeholders (supermarkets, universities, shopping centres, schools, etc) to arrange the provision of containers.
Facilities for deposits at events: Practical considerations and resource implications (weekends, etc) would require to be considered.

- **Procurement of recyclate:**
This is relevant to Private Contractors within the waste industry. The Council is supportive to improve markets for materials and use recycled material where practically and economically feasible.
- **Reduction of packaging:**
This is relevant to manufacturing and retailing sectors. Prioritise and encourage the use of packaging using a single material. Single material packaging has a positive effect on recycling rates. Less contamination (higher quality) and easier to manage through the recycling process.
- **Deposit & return schemes:**
It is suggested that channelling this activity should be channelled through Retailers & Manufacturers as done in other countries (i.e. Sweden).
- **Charge for Supply of Carrier Bags:**
Although no significant waste reduction would be expected, the benefits of this are that this initiative will raise the profile of recycling. (A simple positive action). This may ultimately have a positive effect on participation rates and may help to tackle the “through-away” culture. All Supermarkets should be required to provide take back schemes as it would discourage the public from requesting the Council to collect plastic bags for recycling. A very costly initiative with very little effect on tonnage/ targets.

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

It would have been useful to have a number of workshops to support the consultation process to further understand the requirements of the application of this consultation. Some example and models of best practice may also be useful to aid and support practical implementation of the bill.

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

As per Q16 it would have been useful to have a number of workshops to support the consultation process to further understand the requirements of the application of this consultation. Some example and models of best practice may also be useful to aid and support practical implementation of the bill

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

The general issues are that Sustainable Development may have impacts on future new buildings developments and its planning requirements to meet Planning and building standards. Energy efficiency of buildings will be an ongoing requirement for asset management and greater demand for energy e.g. use of technology within schools need to be better understood regarding longer term implications.

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

No comment.

Q20 Do you have any other comments on the Bill?

No comment.

Implications of this report

1. **Financial Implications**
No immediate or direct implications, but the adoption of courses of action arising from the Climate Change Bill may have implications with regards to investment and resources. Prudential borrowing in the nature of spending to save projects will need to be considered.
2. **Personnel Implications**
Any implications will be in the medium to longer term. A change in working practices is seen more likely than seeking additional resources.

3. **Community Plan/Council Plan Implications**

Healthier - Reductions in greenhouse gas emissions will bring beneficial health effect to the community.

Safer and Stronger – Greenhouse gas reductions will support safer and stronger communities.

Greener – Reductions in greenhouse gas emissions will bring beneficial health effects to the community.

Developing our Organisation – Greenhouse gas reductions will enable improved ways of working and facilitate development of our organisation in areas of asset management and corporate working.

4. **Legal Implications**

Legal requirement for the Council when the Bill is approved.

5. **Property Implications**

Property requirements regarding energy efficiency will be an on going requirement and have an effect on working practises e.g. mobile/home working.

6. **Information Technology Implications**

Current systems will be utilised to support new ways of working.

7. **Equal Opportunity Implications**

None.

8. **Health and Safety Implications**

Reduction on Greenhouse gas emissions will improve health of the community.

9. **Procurement Implications**

None.

10. **Risk Implications**

Risk of compliance with Climate Change Bill if resources are not aligned to areas for improvement.