

## Summary

RSPB Scotland is supported by over 79,000 members and employs around 200 staff to promote the conservation of birds and biodiversity. Our work covers a wide range of issues including planning, climate change, energy, marine issues, water, trade and agriculture. In combination with RSPB staff across the UK, and our international partners in Birdlife International, we have cross-cutting expertise and experience of land use and sustainability issues within Scotland, the UK and internationally.

Climate Change is the greatest long-term threat to our environment and humankind. RSPB Scotland believes that it is vitally important that Scotland sets an example to the world in helping tackle climate change by making deep and sustained cuts in greenhouse gas emissions. RSPB Scotland recognises the scale and urgency of the climate change problem, and are mobilising our own resources as an organisation, and the talents, energy and efforts of our membership, to help address it. We are taking steps to reduce emissions from our own use of energy in our properties and in our work travel as well as promoting energy saving and renewables to the wider public. We have long been a keen supporter of renewable energy and work closely with the Scottish Government and industry to encourage developments in the right places, which avoid environmental harm. (See Scotland's Renewable Future<sup>1</sup>).

With others in the Stop Climate Chaos Scotland<sup>2</sup> coalition, we have developed a shared view on the key issues for a Scottish Climate Change Bill including the following top line asks:

1. Set out a framework that will achieve *at least* an 80% reduction in greenhouse gas emissions by 2050.
2. Establish in statute annual emission reductions of *at least* 3% year-on-year from the start, not just from 2020, compatible with a fair and safe cumulative budget identified by the advisory body (see 4).
3. Include emissions from all sectors in the framework and targets set out in the Bill, including those from international aviation and shipping, from the very start.
4. Establish a Scottish advisory body, a Scottish Climate Change Commission, in the primary legislation to support delivery of the Bill when it is enacted.
5. Ensure that at least 80% of the effort to cut emissions takes place in Scotland.
6. Establish duties on all public bodies to reduce greenhouse gas emissions in line with the national target.
7. Set in place robust, transparent reporting measures so the Scottish Parliament is well informed on progress in meeting targets and Government is held to account on mitigation and adaptation.
8. Ensure that strong enforcement measures are set in place in statute.
9. Ensure Scotland counts all its emissions and reports on those produced by products and services we consume as well as emissions produced domestically.
10. Be explicit that sustainable development is core to the purpose and delivery of the statute in relation to mitigation and adaptation.

RSPB Scotland's evidence provides additional detail concerning environmental issues, to complement the general positions given in the SCCS and Scottish Environment LINK evidence, to which we are signatories.

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<sup>1</sup>[http://www.rspb.org.uk/ourwork/conservation/sites/scotland/responsible\\_renewables/index.asp](http://www.rspb.org.uk/ourwork/conservation/sites/scotland/responsible_renewables/index.asp)

<sup>2</sup>[www.stopclimatechaos.org/scotland](http://www.stopclimatechaos.org/scotland)

## The climate change threat to our natural environment

Climate change is having a staggering impact on our environment – a third or more land based plant and animal species could be driven to extinction by the 2050s if we take no action to limit global warming. To avoid these catastrophic impacts, we have to act in a sustainable manner to rapidly cut greenhouse gas emissions and plan adaptation to the inevitable changes that will occur. **We therefore urge the Scottish Government to provide a Scottish Climate Change bill with annual emissions reduction targets of at least 3% from the outset to deliver at least an 80% reduction in greenhouse gas emissions by 2050.**

Through RSPB Scotland's research, land management on our reserves, and our network of volunteers we are well aware that the natural world is already being affected by climate change. This work provides warnings of the threats to species, habitats and ecosystems if we do not take urgent steps to address climate change. Wildlife in Scotland is responding to the unprecedented rate of temperature change with some bird species arriving earlier in migration, earlier blooming dates for plants, and earlier appearance of insects as spring creeps forward and autumn recedes. These changes are not occurring uniformly and discrepancies are leading to disruption of the food chain for some species.

Climate change may be having a dramatic damaging effect on Britain's coastal wildlife, through undermining the food supply of seabirds on the North Sea coast. The spectacular seabird colonies on Shetland and Orkney have suffered catastrophic breeding failure, with poor management of the marine environment now being exacerbated by climate change. Due to rising sea temperatures, the plankton mix at the base of the food chain has altered radically, reducing the survival of sandeels – the staple diet of many seabirds, and commercial fish species.

Birds found in our uplands such as golden plover, are facing a serious reduction in breeding success as climate change affects their invertebrate food supply. These changes threaten an important part of our biodiversity as well as key tourist attractions with significant economic value.

## A sustainable approach to tackling climate change

**RSPB Scotland would like to see a strong commitment in the Bill to ensure climate change is tackled in a sustainable way that works within environmental limits.** How we tackle climate change is important. There is no point saving the planet if we have destroyed our natural environment in the process. A healthy environment, where wildlife thrives can help in tackling some of the causes of climate change and provide natural solutions for dealing with impacts from changing weather and sea level rise. Much of Scotland's economy and our international identity depend on the rich array of species and habitats that make up our biodiversity. There are many win-win solutions available where wildlife conservation can be delivered alongside action to address climate change. Examples are provided in an RSPB Scotland leaflet (Helping Nature to Help Us<sup>3</sup>) and include:

- Peatbog restoration. Our peatland soils hold more than 40 times as much carbon as all the vegetation above ground. The living layer of mosses on a healthy bog contains as much carbon per hectare as a forest. Despite this importance, the majority of Scotland's peatlands are left in a damaged state from past agriculture and forestry management, as well as peat extraction resulting in carbon losses with minimal funding available to address this and help restore them.
- Managing natural wetlands to provide flooding solutions as well as habitat for threatened species.
- Restoring and expanding native woodland habitat to conserve declining species and offer sustainable sources of fuel to meet local energy needs.

**To achieve this sustainable approach, RSPB Scotland would like to see an over-arching sustainability included in the Climate Change (Scotland) Bill, and the long title amended to reflect this commitment to a sustainable approach.**

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<sup>3</sup> [http://www.rspb.org.uk/Images/Final%20Final%20Scottish%20Climate%20A4%20booklet\\_tcm9-184696.pdf](http://www.rspb.org.uk/Images/Final%20Final%20Scottish%20Climate%20A4%20booklet_tcm9-184696.pdf)

## **Adapting to the impacts of Climate Change (s45)**

**We believe Scottish Ministers should be required to produce a Scottish impact assessment and to report regularly to the Scottish Parliament on programmes of sustainable adaptation action.** Without cutting our greenhouse gas emissions, the climate change impacts will be so great that dealing with the consequences will be come impossible. We must therefore make emissions reduction a priority but also recognise that urgent and important work is required to adapt to the inevitable impacts of climate change from historic and present emissions, which remain in the atmosphere for many years.

Scotland has its own special environmental challenges when it comes to adaptation, including providing natural solutions to coastal and inland flooding and restoring large areas of peatland habitat and native woodlands as well as providing greater support for wildlife in our farmed landscapes. Much of our natural environment has been damaged by past activity and the resilience of many of our important species and habitats has been compromised. We believe that urgent action is required to take forward ambitious programmes of large, landscape-scale habitat enhancement to provide climate change adaptation benefits for wildlife and communities threatened by the impacts of climate change.

On our own nature reserves, we have undertaken habitat restoration which we believe can help demonstrate adaptation benefits. These include managed realignment at Skinflats near Grangemouth on the Forth Estuary and Nigg Bay on the Cromarty Firth where saltmarsh and mudflat habitat will be reinstated, providing vital feeding and nesting sites for internationally important bird populations as well as flood management benefits. To date there have been few examples elsewhere of such activity and we believe that strong leadership and coordination is required across public bodies to deliver such benefits at a large enough scale to provide resilience for wildlife and people, in the face of climate change.

**Currently the Climate Change (Scotland) Bill relies on the UK risk assessment (section 56 of the Climate Change Act 2008) rather than requiring a specific report assessing the risks for Scotland. RSPB Scotland believes Scotland's unique environment and population distribution demand an accurate assessment of the risks for Scotland. At the very least we would seek to ensure that SNH and SEPA play an active role in the UK risk assessment process.**

**The Climate Change (Scotland) Bill proposes that once Scottish Ministers have produced a programme of proposals and policies to meet the objectives of adapting to climate change, the only subsequent assessment of the progress made towards meeting the objectives is to be made by Ministers themselves. The Climate Change Act 2008 (s59) requires the Committee on Climate Change to assess the progress being made by the UK proposals and policies and we would expect a similar level of independent assessment of Scottish Ministers' progress.**

### **Land use**

Land use in Scotland is responsible for 25% of our emissions, due largely to our organic carbon rich (peaty) soils and much of the responsibility for land use decisions is devolved to the Scottish Parliament. It makes sense therefore to ensure that the Scottish Climate Change bill addresses this sector. Farmers and other land managers need advice to better manage our soils to reduce carbon emissions and the research capacity of appropriate land use research institutes needs to be harnessed to this effect. Further support from the Scottish Rural Development Programme (SRDP) for appropriate management action will also be required to drive the necessary changes. **RSPB Scotland believes that the Bill needs to address the contribution Scotland's land uses make to climate change, and to facilitate environmentally sustainable mitigation and adaptation action. We would welcome an indication in the Bill that the Scottish Government's forthcoming Land Use Review would set out a strategic approach for managing Scotland's land use in relation to climate change mitigation and wildlife adaptation.**

### **Forestry**

We do not welcome the additional broad powers being proposed in Section 47 (1, 2 & 4) to over-ride the Forestry Commissioners' duties under the Forestry Act 1967, and to delegate their functions. If enacted, these provisions could result in environmentally unsustainable forestry that would harm, not enhance biodiversity. The RSPB would expect full and proper consultation and public debate on any fundamental changes to the primary legislative framework of forestry in Scotland. This should be done separately from the Climate Change (Scotland) Bill.

We strongly support the idea of Forestry Commission Scotland being able to participate in environmentally appropriate joint ventures to address climate change under Section 47 (3).

Full written evidence on Section 47 of the Bill has been provided to the Rural Affairs and Environment Committee and is appended here. [CLICK LINK](#)

### **Muirburn**

RSPB Scotland believes that introducing the flexibility to allow Scottish Ministers to make any required changes to muirburn dates in the future, based on sound and growing scientific evidence about management measures that can be taken to help climate change adaptation, as provided for by Section 46 of the draft Climate Change (Scotland) Bill is a sensible approach.

We would add that we also support the idea of making provision through a licensing system for out of season burning, to allow flexibility of approach. To provide the necessary safeguards for the natural heritage from out-of-season burning, we consider that a licensing system should be put in place and it seems to us most appropriate that such a system is administered by Scottish Natural Heritage as the Scottish Government's advisors on nature conservation.

Such a licensing system would, as mentioned, enable a flexible approach whilst a change in the unlicensed dates would reflect the needs of a changing climate and bring Scotland into line with England and Wales. We would welcome amendments to the draft Climate Change (Scotland) Bill to enable such a licensing system to be established at the same time as any changes in the permitted times for making muirburn.

Again, full written evidence on Section 46 of the Bill has been provided to the Rural Affairs and the Environment Committee and is appended here. [CLICK LINK](#)