

WRITTEN SUBMISSION FROM SCOTTISH CATHOLIC INTERNATIONAL AID FUND

SCIAF welcomes the presentation of the Climate Change (Scotland) Bill before the Scottish Parliament and is pleased to submit written evidence to the Transport Infrastructure and Climate Change Committee. SCIAF supports local communities in over 20 countries in Africa, Asia and Latin America, helping thousands of families to combat the negative effects that climate change is already having on their day to day lives. SCAIF has also undertaken policy and campaigns work on climate change in Scotland and at an international level since 2007; independently, as a member of Stop Climate Chaos Scotland, and as part of extensive international networks. Consequently we are well-placed to bring the voice of poor and vulnerable communities overseas to a legislative process that will not only affect those living in Scotland but communities worldwide.

As a member of Stop Climate Chaos Scotland (SCCS) we endorse its priorities (see below) and its full submission. Where appropriate, we will ask you to refer to its submission which reflects SCIAF's views on particular topics. The Stop Climate Chaos Coalition Scotland priorities for the Climate Change (Scotland) Bill are that it must:

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 all emissions 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.
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.

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?

For a full response, please also refer to the SCCS submission. [CLICK LINK](#)

SCIAF welcomes the long-term greenhouse gas emissions reduction target of at least 80% by 2050 based on 1990 levels outlined in the Bill, which we feel represents a strong commitment to doing Scotland's fair share to tackle climate change.

However, further to the evidence submitted by SCCS, we must stress the importance of committing Scotland to a greenhouse gas emissions reduction trajectory that ensures early action and makes a fair contribution to the global effort needed to prevent dangerous climate change.

Early action is essential because people living in developing countries are already feeling the effects of climate change. The UN estimates that between 2000 and 2004, 262 million people were affected by climate related disasters each year. 98% of these people were from developing countriesⁱ. Should global temperatures continue to rise, many more will be affected. Indeed it is crucial for poor and vulnerable communities worldwide that the global surface temperature is not permitted to rise beyond what the UN has called a 'tipping point' – the temperature at which 'the risk of large-scale human development setbacks and irreversible ecological catastrophes will increase sharply'ⁱⁱ. The IPCC has identified this potential tipping point as a rise of 2°C above pre-industrial levels, however at the most recent UNFCCC Conference of Parties in Poznan in December 2008, the Alliance of Small Island States (AOSIS), pointing to new scientific evidence, stated that their future survival depended on rises in global surface temperatures staying below 1.5°C.ⁱⁱⁱ

It is therefore essential that Scotland commit itself to early action and retain the ability (and be willing) to revise the current commitment to a reduction in greenhouse gas emissions of at least 80% by 2050 upwards in line with changing climate science. Ensuring early action also means committing to annual targets of at least 3% greenhouse gas emissions reductions per annum from 2010 onwards and amending the interim target from 50% reduction in greenhouse gas emissions by 2030 to 50% reduction in greenhouse gas emissions reduction by 2020 (based on 1990 levels).

By setting the interim target for 50% by 2020, we would not only be committing ourselves to early action but setting a leading example which would be immediately comparable with UK and EU targets, both of which have 2020 rather than 2030 targets.

Further, by setting the interim target at 50% by 2020, we would automatically meet the UK's share of the EU's 2020 target should it be revised upwards in light of a global deal on climate change being reached at the UNFCCC Conference of Parties in Copenhagen in December 2009. The current EU deal commits member states to a collective reduction in greenhouse gas emissions of 20% by 2020 and if a global deal is reached this figure will be increased to 30% by 2020 (based on 1990 levels). Because the EU greenhouse gas emissions reductions commitment is based on the principle of effort sharing, economies with a high GDP per capita such as the UK are expected to reduce their greenhouse gas emissions by more than those member states with a lower GDP per capita. The UK Committee on Climate Change has therefore recommended that the UK as a whole should commit to reducing its greenhouse gas emissions by 34% by 2020, or 42% by 2020 (based on 1990 levels) should a global deal be reached^{iv}. It is widely recognised that Scotland is well-placed to cut its greenhouse gas emissions by more than the UK average. Consequently, by setting the interim target at 50% by 2020, Scottish legislation is likely to be consistent with the UK's share of any revised EU target.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please also refer to the SCCS submission.

SCIAF recommends the adoption of annual emissions reductions targets of at least 3% year on year from 2010, to ensure that Scotland commits itself to early action on climate change. This is also in keeping with current scientific evidence and would keep us on track for the 2050 target.

A study for the IPPR by Paul Baer and Michael Mastrandrea^v which looked at global emissions reductions found that, in order to have a 74-91% chance of keeping the temperature increase to 2°C, global emissions must contract by 5% each year from 2010 onwards. A 2006 report by the Tyndall centre looked at the UK and found that, if it was to do its fair share of stabilising atmospheric carbon emissions at 450ppmv by 2050—a level which still carries a 50% chance of exceeding 2 degrees^{vi}—this would require decarbonisation of 9-13% per annum^{vii}.

When the science is suggesting annual cuts of 5-13%, 3% must be seen as a bare minimum. Annual targets of at least 3% are also in keeping with the SNP's manifesto promise of 'mandatory carbon reduction targets of 3% per annum'.

Annual targets of at least 3% commencing from 2010 onwards must be included in primary legislation for the Climate Change (Scotland) Bill to ensure it is a truly world leading piece of legislation that commits Scotland to doing its fair share to tackle climate change.

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?

For a full response, please also refer to the SCCS submission.

SCIAF, like SCCS, believes that the vast majority of greenhouse gas emissions reductions should come from Scottish sources, and not be 'bought in' from other countries. In addition to the reasons outlined in the SCCS submission, SCIAF believes that the majority of greenhouse gas emissions reductions should come from Scotland because:

- The use of carbon credits might detract from domestic reduction effort. The unrestricted availability of international credits may create an incentive for administrations to emphasise short term, quick and easy fixes abroad, instead of focusing on the longer term changes that are necessary in Scotland. Whilst this may reduce emissions in the short term the danger is that, by putting off difficult decisions, it stores up problems for the longer term.
- Overuse of international credits would risk sending mixed messages and engendering cynicism amongst the general public as the government could be perceived as 'buying its way out' of its responsibilities. This could be damaging domestically, whilst also putting Scotland's international leadership credentials on this issue to the test.

- One of the major obstacles to securing a global deal at the UNFCCC Conference of Parties in Copenhagen this year is the lack of trust present between developed and developing countries. Failure to make firm emissions reduction pledges and the over-reliance on international credits and trading schemes by developed countries has engendered scepticism amongst developing countries. A Bill that limited the proportion of emissions reductions bought in from elsewhere would make Scotland amongst the first industrialised nations to demonstrate its commitment to make deep cuts at home. In doing so Scotland would be at the forefront of generating greater trust and confidence among developing nations, which is desperately need to ensure we have any chance of securing a sufficiently ambitious global deal at Copenhagen.
- Our historical responsibility for climate change. The UK has a particular responsibility for climate change being, in 1830, the first country to emit more CO₂ a year than the current sustainable level – something we have continued to do till today.^{viii} In 2005, just one of Scotland's power stations, Longannet on the River Forth, emitted ten times more CO₂ than Malawi produces in a year, and more CO₂ than ten sub-Saharan African countries combined.^{ix} Scotland must address this historical responsibility for climate change by ensuring that the majority of greenhouse gas emissions reductions come from domestic sources.

SCIAF does not wish to rule out the use of international carbon credits altogether, however a limit must be placed on the amount of international credits that can be used to prevent Scotland from becoming over-reliant on international credits as a means of making up for annual shortfalls in domestic greenhouse gas emissions reductions.

Further, should international credits be used by the Scottish Government, they should adhere to international best practice. The following principles must apply to international credits used by the Scottish Government:

- Full transparency: annual reports on emissions reductions must show actual emissions from Scotland and net emissions after credits are taken into account.
- Ownership by developing countries and affected peoples: the methods by which international credits are generated must have the free, prior and informed consent of the host country government and of local communities affected by the project.
- Genuine social and environmental benefits: international credits must promote sustainable development and be additional to existing mitigation efforts.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS 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?

For a full response, please refer to the SCCS 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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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?

For a full response, please refer to the SCCS submission.

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

For a full response, please refer to the SCCS 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?

For a full response, please refer to the SCCS submission.

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

For a full response, please also refer to the SCCS submission.

Climate change is fundamentally a matter of international equity. Climate change has a disproportionate effect on poor and vulnerable communities, those who have done the least to cause it. It is also very likely that climate change will widen inequalities between the developed and the developing world further as well as compounding existing social inequalities within developing countries.

Indeed, we are already witnessing the disproportionate effect climate change is having on women living in developing countries, particularly those living in rural areas. Women are responsible for up to 75% of household food production in developing countries. Increased droughts and water scarcity stand to make this role even more time-consuming. This not only makes their day-to-day lives more difficult, it risks reducing the amount of time they have to spend on other activities, such as paid employment or education. Consequently, climate change is contributing to the further entrenchment of gender-based inequalities in the developing world^x.

Further, poor and vulnerable people are less able to adapt to and manage the impacts of climate change that have occurred and will continue to occur over the coming decades. There is consensus from international bodies (from the IPCC to the UNDP) and from people on the ground that adaptation is essential, and that insufficient adaptation has consequences for social justice, respect of human rights and global inequalities. However, the countries where adaptation is most urgently needed are least able to provide it. They lack the necessary finance, the necessary infrastructure and often the relevant information. In countries with extremely tight budgets, finding money for adaptation may mean taking money away from basic social services such as health and education.

By contrast, developed nations—including Scotland—have the financial means to fund adaptation and have the moral responsibility to do so. Given Scotland's historical responsibility for greenhouse gas emissions, we should provide compensation to those most vulnerable to the impacts of climate change. Indeed, the Climate Change (Scotland) Bill provides a unique opportunity here for the Scottish Government to redress these inequalities by playing a role in providing resources to fund adaptation in developing countries.

Even relatively modest sums of funding provided could have a real impact in practical terms on the ground – as has already been proved by the impact that Scottish Government development aid has had.

It would also have a symbolic importance that would far outweigh its practical benefits. Obtaining sufficient, secure, additional and accessible financing for mitigation, adaptation and technology transfer is key to obtaining a global deal on Climate change at the UNFCCC Conference of Parties in Copenhagen in December 2009. The current lack of financing has become an important excuse for inaction at the negotiations. Scotland, by providing some funding for adaptation, could play an important role in breaking this deadlock.

Consequently, the Scottish Government should make some funding available that will allow communities in developing countries to adapt and respond to the climate change that is already impacting upon their lives. As a matter of principle this funding must be in addition to, and not be drawn from, the development aid budget, with a fixed, predictable amount made available year-on-year. Across the world we are seeing increasing levels of funding for developing countries to adapt to the effects of climate change, but this often comes from existing aid budgets. Since developed industrialised countries have, by and large, caused climate change, the 'polluter pays' principle means they should be obligated to pay for such adaptation measures as a matter of course. This must not 'eat into' existing development aid budgets which were set up before climate change and its effects became apparent.

The provision of secure, accessible and additional funding for adaptation is essential to ensure that Scotland does its fair share to address the inequalities that have already resulted from climate change.

(For more detailed answer on how to include funding for adaptation please see the response to question 20)

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

For a full response, please also refer to the SCCS submission.

We agree with SCCS that sustainable development should be an underpinning principle of the bill, and we would therefore like to see a sustainable development duty included in the Bill in Part 6 and also see 'sustainable development' referenced in the Bill's long title. This would ensure that the bill remains focused throughout on promoting positive and sustainable development both in Scotland and in the developing world. It would also acknowledge the truly global nature of climate change and recognise the impact that the Climate Change (Scotland) Bill could have on communities across the globe.

Further we also believe that it is essential that the Climate Change (Scotland) Bill should place a duty on the Scottish Government to ensure that any mitigation and adaptation efforts contribute to the furthering of sustainable development; and ensure the avoidance of negative social and environmental impacts on poor and vulnerable communities worldwide. This, for example, would guard against a reliance on first-generation biofuels to meet annual greenhouse gas emissions reductions commitments in the transport sector because of the damaging effects they can have on rural communities and food security in the developing world.

Q20 Do you have any other comments on the Bill?

For a full response, please also refer to the SCCS submission.

(Please also see SCIAF's response to Question 18)

In recognition of the urgent need for adaptation funding in the developed world, we propose that the Scottish government make a relatively modest sum of money available to help developing countries adapt to climate change that is already happening. As a matter of principle this must be in addition to, and not be drawn from, the development aid budget, with a fixed, predictable amount made available year-on-year from direct government funding.

In addition to its predictable core funding, such a fund could be topped up from innovative sources. One such suggestion is a 'climate fund' mechanism, replenished in part through fines (or missed incentive payments) levied against Government Departments and publicly-funded bodies that have failed to meet relevant climate emissions targets. Such a fund, if designed well, could incentivise public bodies to meet their emissions reductions targets, mobilise additional investment to meet emissions reductions targets and adaptation projects within Scotland, and result in additional funds being available for adaptation overseas.

ⁱ **UNDP** (2007) *Human Development Report: Fighting Climate Change – Human Solidarity in a Divided World*

ⁱⁱ **UNDP** (2007) *Human Development Report: Fighting Climate Change – Human Solidarity in a Divided World*

ⁱⁱⁱ Scientific evidence referred to can be found in **Hawkins et al.** (2008) *Climate Safety: In Case of Emergency...* (Public Interest Research Centre, United Kingdom)

^{iv} **UK Committee on Climate Change** (2008) *Building a Low Carbon Economy – the UK's Contribution to Tackling Climate Change*

^v **Baer and Mastrandrea** (2006) *High Stakes*, Institute of Public Policy Research,

^{vi} **UNDP** (2007) *Human Development Report: Fighting Climate Change – Human Solidarity in a Divided World* p7

^{vii} **Tyndall Centre** (2006) *Living within a Carbon Budget: Report for Friends of the Earth and the Co-operative Bank*

^{viii} **WDM** (2007) *Climate Calendar: The UK's unjust contribution to global climate change* p4

^{ix} **Scottish Environment Protection Agency** (2005) *SPRI Emission Data; Return Details for Scottish Power Longannet Power Station* figures show that, in 2005, Longannet emitted 8.5 million tonnes of carbon dioxide. The 10 sub-Saharan African countries include Malawi, Rwanda, Burundi, Chad, Comoros, Uganda, the Democratic Republic of Congo, Gambia, Mali and the Central African Republic. Figures from the Energy Information Administration (2004) *World carbon dioxide emissions from the consumption and flaring of fossil fuels 1980 – 2004* show that emissions from these ten countries add up to 8.29 million tonnes.

^x **Action Aid** (2007) *We Know What We Need: South Asian Women speak out on climate change adaptation*