

WRITTEN SUBMISSION FROM SCOTTISH ENVIRONMENT LINK

The Scottish Environment LINK (LINK) Climate Change Task Force welcomes the opportunity to provide written evidence on the Climate Change (Scotland) Bill. Established in 1987, LINK is the forum for Scotland's voluntary environment organisations¹ - 32 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK provides a forum and network for its member organisations, enabling informed debate, and assisting co-operation within the voluntary environmental sector. LINK assists communication between member bodies, government and its agencies and other sectors within civic society. Acting at local, national and international levels, LINK aims to ensure that the environment is fully recognised in the development of policy and legislation affecting Scotland.

The LINK Climate Change Task Force works closely with the Stop Climate Chaos Coalition² (SCCS) and supports the top ten priorities for the Bill identified by SCCS. The coalition members include environment and development NGOs, faith groups, trade unions, community councils, student societies, women's organisations, a mental health charity, and many others. In Scotland, the members have a combined supporter base of over 1.5 million people.

The LINK Climate Change Task Force supports the following ten Stop Climate Chaos Coalition Scotland priorities for the Climate Change (Scotland) Bill. The Bill 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 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.

LINK member bodies believe that Scotland needs urgent action on climate change and have been calling for greenhouse gas reductions to be delivered in a sustainable manner and for adaptation measures to be put in place to help secure our natural and cultural heritage. We are using our environmental experience and strong membership base in helping to address climate change, but we need the Government to provide the lead to ensure policies and decision-making go in the right direction to reduce greenhouse gas emissions.

Further information outlining LINK's view on climate change is available in the document - Time to Act on Climate Change³

¹ www.scotlink.org

² <http://www.stopclimatechaos.org/scotland>

³ <http://www.scotlink.org/pdf/LINKClimateStatementSept08.pdf>

1. Reducing greenhouse gas emissions

Climate change is the greatest threat facing our environment and humankind and it requires immediate and sustained reductions in greenhouse gas emissions to avoid disastrous consequences. Research predicts that without urgent action, climate change could cause the extinction of up to one million species worldwide by 2050, which is more than a third of land-based species. Numerous devastating climate change impacts on biodiversity and ecosystems are identified in the various reports from the IPCC.

The Millennium Ecosystem Assessment⁴ states that, if significant global adverse changes to ecosystems are to be avoided, efforts should be made to limit the increase in global mean surface temperature to less than 2°C above pre-industrial levels and to limit the rate of change to less than 0.2°C per decade.

Currently, the best scientific advice points to the need for greenhouse gas reductions in developed countries of at least 80% by 2050. This would give us a reasonable likelihood of staying below a 2°C increase in global temperature, which is considered the maximum manageable level if we are to avert the worst effects of climate change.

We consider that early emissions reduction of at least 3% per annum is necessary and achievable in a sustainable manner. To delay makes the cuts required in future so great and rapid that it may be too difficult to achieve without severe social, economic and environmental consequences.

We want to see this reflected in the Scottish Climate Change Bill with strong statutory long-term and annual targets to deliver the necessary greenhouse gas reductions in order to avoid dangerous levels of climate change.

2. A sustainable approach

LINK considers it essential that a strong sustainability duty is included in the Bill. Sustainable development means recognising environmental limits while considering the environment, social issues and the economy together. This is the only way to really tackle climate change and ensure our actions do not add to the challenges brought about by climate change. Our use of energy for homes and businesses, travel, our consumption of goods and food and our use of the land and sea are all major sources of greenhouse gas emissions. Reducing these emissions needs to be set within a legislative framework that encourages a sustainable approach. This means delivering energy demand reduction and efficiency, along with renewables without environmental harm; reducing waste and encouraging recycling. It means greater support for walking, cycling and public transport rather than expanding airports and roads. It also means finding ways to manage our land to provide multiple public benefits, including attractive landscapes and natural habitats, improved local economies and quality of life.

A sustainable approach will also avoid environmental conflict when considering the most appropriate ways to reduce greenhouse gas emissions or adapting to climate change. Present and future generations depend on a healthy environment and there is no point seeking opportunistic ways of addressing climate change which threaten biodiversity, landscapes or our cultural heritage. Indeed, our natural environment if managed sustainably can often help in cutting emissions and providing the means to deal with a changing climate.

The Ministerial Foreword to the consultation document recognises the need for sustainability to be at the heart of all policies, including climate change but this is not reflected in the legislative proposals. We think that it is vital that such a strong legislative framework document should include a clear steer that climate change should be tackled in a sustainable manner.

⁴ <http://www.millenniumassessment.org/documents/document.318.aspx.pdf>

3. Adaptation

LINK welcomes the Bill's proposals for Government to produce reports on Adaptation. We are already seeing changes in our natural environment on land and at sea, with many of Scotland's most iconic species and habitats showing particular vulnerability. The right adaptation measures are vital to ensure the conservation of Scotland's biodiversity, and to address the threats to ecosystem structure and function. In our built heritage, our historic buildings are facing extremes of weather not previously experienced in their lifetimes. Coordinated action across all sectors is required to help make our environment resilient, bearing in mind that much of it is already in a damaged and deteriorating state.

In order to deliver the right response in Scotland it is important that decision-makers have the right information on the impacts of climate change relevant to the particular Scottish circumstances. **We therefore would like to see the Bill require the Scottish Government to produce their own climate change impact assessment with support from the relevant advisory body, rather than rely entirely on a UK impacts report.**

It is also important that the Bill provides for independent public scrutiny of the Scottish Government's progress in implementing its adaptation policies and programmes. **We therefore recommend that the Scottish Climate Change Bill should require the production of a Scottish adaptation programme at least every three years, which includes:**

- an assessment of the current and future predicted impact of climate change in Scotland
- the objectives of the Scottish Government in relation to adaptation to climate change
- the Scottish Government's proposals, policies and timescales for meeting those objectives

and should provide for:

- an independent assessment, at least every two years, of progress towards implementing the objectives, proposals and policies set out in the adaptation strategy
- annual reporting to the Scottish Parliament of achievements and revisions to the strategy

4. Muirburn

LINK supports the Bill's enabling powers for Ministers to vary muirburn times. This is a measure which is required as part of our adaptation response to the impacts of a changing climate. Many moorland ground-nesting birds have already shown a response to climate change by breeding earlier in the season and it is important therefore for Ministers to be able to adjust the times at which muirburn is permitted in order to avoid harming wildlife. Key stakeholders of the Moorland Forum, a consortium of organisations with an interest in moorland management issues have responded to a Scottish Government request for an agreed position and provided a statement in support of the Bills proposals.

5. Forestry ⁵

In principle, LINK welcomes the fresh look at how the Forestry Commission Scotland (FCS) can deliver for climate change but we are particularly concerned that the plans proposed in the Bill are controversial, not fully explained or costed and as such, they represent a distraction from the important climate change priorities in the Bill.

Creating new woodlands contributes to carbon sequestration as does restoring damaged woodlands, but the benefits of this are relatively small and scientifically challenging to confirm compared to carbon mitigation from reductions in our use of fossil fuels. The National Forest Estate whilst having a role to play in carbon sequestration also has a vital role in adaptation yet this was not considered in the FCS proposals. Much of the public concern voiced over the Bill's forestry proposals was a reflection of support for the multiple benefits of our forests including environmental and recreational values which could be undermined if carbon became the primary driver for the National Forest Estate.

⁵ Please see <http://www.scotlink.org/pdf/LINKWTFWrittenEvidenceRAECommitteeForestryProposalsCCScotBil3Feb2009.pdf> for detailed LINK evidence to the Rural Affairs and Environment Committee on the Forestry provisions in the Claimed Change (Scotland) Bill.

It is LINK's view that these proposals require more considered thought and discussion. As a result, we are unhappy with the wide reaching enabling powers in Section 47, sub sections 1,2 and 4 being included in the Bill. Rather we would like to see any specific powers that may be identified, legislated for in future, after they have been properly explored and consulted upon. We do however welcome the inclusion of Subsection 3,a), b), c) and d) (i) which allows the FCS to enter into joint ventures which could include renewable energy projects, because these proposals are specific and directly relevant to the Bill's aims.

LINK also considers it important to recognise that land use as a whole, including agriculture, forestry, and nature conservation are all important for climate change mitigation and adaptation. We believe that Scotland should have a sustainable land use strategy to deliver a holistic, integrated approach to land use which addresses climate change and delivers multiple public benefits.

6. Energy Efficiency

LINK welcomes the recognition the Bill gives to the role energy efficiency will play in driving down emissions and closing a future energy gap. However, there are a number of key areas where this section could be improved. Firstly, the Bill should refer to 'improving' rather than 'promoting' energy efficiency wherever possible. This language is used in the Housing (Scotland) Act 2006, section 179 (duty of Scottish Ministers to prepare strategy for *improving* the energy efficiency of living accommodation) and should be adopted in defining the aims of this Bill with regard to energy efficiency.

There has been considerable delay (some six years) in the provision of a long promised Energy Efficiency Action Plan and the Bill should not prevent its earliest possible publication. The Plan should include targets on energy efficiency, and progress should be reported in terms of reduced energy demand, reduced emissions, and increase in microrenewables as part of the Annual Report set out in Part 3 – Reporting Duties.

The following member organisations have agreed this statement:

Friends of the Earth Scotland
The John Muir Trust
National Trust for Scotland
Plantlife Scotland
Ramblers' Association Scotland
RSPB Scotland

Scottish Allotments and Gardens Society
Scottish Wildlife Trust
Woodland Trust Scotland
WWF Scotland

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