

WRITTEN SUBMISSION FROM TREVOR RIGG

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?

I am concerned that the draft Bill proposes putting off annual reductions of at least 3% until 2020. Time for action is now, so the Bill must require immediate action of at least 3% reductions in emissions per year (in line with the SNP Manifesto commitment) from the start, not just in ten years time. Delaying a requirement for at least 3% reductions in emissions until 2020 means action will be too late.

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?

There must be a limit on the amount of emissions reduction that Scotland can buy from overseas. This is vital if the Bill is to ensure Scotland benefits from real domestic emissions reductions and plays its fair part in tackling climate change.

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?

Ministers have made a commitment to include international aviation and shipping from the start, but the Bill as drafted does not provide those assurances. It says emissions from aviation and shipping will only be included after more consultation and legislation. The Bill should be clear all emissions will be included from the start.

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?

Robust reporting to help Parliament hold Scottish Ministers and Government to account. The spirit of the Bill is good, but the mechanisms and processes need to be strong, transparent and ensure accountability, with scrutiny always in the public domain.

Trevor Rigg