

WRITTEN SUBMISSION FROM WATERWATCH SCOTLAND

Introduction

Waterwatch Scotland (WWS) is the national complaints handling authority for all domestic and non domestic water customers and consumer representative body for the water industry in Scotland.

Our role is to:

- Investigate complaints
- Represent customers' interests and views
- Influence policy
- Inform and advise

WWS' responsibility for second tier complaints handling means that it can take forward individual customer grievances against water providers. WWS can also make statutory recommendations to Scottish Ministers, the Scottish Government, Scottish Water and other industry regulators on customers' behalf including: Scottish Environment Protection Agency (SEPA), Drinking Water Quality Regulator (DWQR) and the Water Industry Commission for Scotland (WICS). WWS can report on any matter that it understands to be relevant to the customer and in the customer's best interest.

WWS also has a statutory remit to champion water efficiency within Scotland. WWS sees this as a key and significant component for Scotland to achieve climate change targets.

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?

In principle, Waterwatch Scotland (WWS) supports the Bill's reduction targets for 2050 and 2030. In particular, WWS would be keen to highlight the contribution that the successful implementation of water efficiency policy would make to an overall reduction in greenhouse gas emissions. However, in order to successfully achieve these targets, they must first be supported and championed by key policy makers within public and private sector in order to drive cultural change within domestic and non domestic settings, and must be enforced through legislation.

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?

In principle, WWS supports setting targets in batches as it provides a more measurable means of assessing progress and achievement of targets. WWS would be further interested in understanding what key activities are to be progressed within each batch, how batches are to be measured and supported locally and nationally.

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?

In principle, WWS supports this approach.

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?

No comment.

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?

No comment.

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?

No comment.

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?

WWS supports this approach.

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?

WWS supports this approach as it places emphasis on public bodies to own and champion policy and measures that address climate change.

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?

WWS supports this proposal. A report produced by the Scottish Government will provide stakeholders with the opportunity to monitor progress being made to achieving targets set by the Bill and to flag up any issues foreseen.

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?

No comment.

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?

No comment.

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?

WWS fully supports this view. WWS is keen to promote the need for measures that will encourage behavioural change, especially with a view to championing water efficiency and the relationship between water use and energy consumption within both domestic and non domestic settings.

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?

WWS supports the development and communication of policy and regulations to assess the direct impact that non-domestic buildings have on greenhouse gases, but also the indirect impact they have through associating water / energy use with responsible consumerism and awareness.

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?

WWS supports steps to highlight the relationship between carbon emissions and heating water. Emphasis on heat from renewable sources factored into this issue to change behaviour and promote responsible consumerism is welcomed.

**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 recyclate;
Reduction of packaging;
Deposit and return schemes;
Charges for carrier bags.**

What are your views on these proposals?

No comment.

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

Consultation with industry stakeholders has been adequate.

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

No comment.

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

No comment.

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

WWS supports the Bill in that it champions a focused and committed approach to identifying measures that will result in reduction of carbon emissions. WWS would support greater emphasis on WICS and WWS having a duty to support ScW in the implementation of sustainable solutions by statute.

Q20 Do you have any other comments on the Bill?

No comment.