



planet

Local action for a sustainable and healthy

Stoneybank,
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10th February 2017

Dear Sirs

Scottish Draft Climate Change Plan RPP3

Transition Black Isle

Transition Black Isle is a charity and part of the global “Transition Network” of communities. We believe that a strong community-based response is required to the issues of climate change and resource depletion, and that action to mitigate these challenges should also seek to make communities more resilient to the likely shocks arising from them.

We welcome the Scottish Government’s draft Climate Change Plan, and its strong commitment to setting and meeting challenging targets for emission reduction. We present our views on the draft Plan, together with some proposals for areas which could, in our view, be strengthened further.

General

The draft Plan places much reliance on technology (EVs, CCS, electrical storage), the EU ETS and SEEP. This seems high-risk – CCS, in particular, seems to be many years from being routinely adopted at utility scale; SEEP, although commendably ambitious, is unproven; and it will most likely be unclear for some time whether we will continue to participate in the EU ETS. On the other hand, there is very little emphasis on behaviour change or community engagement despite the evidence quoted from Climate Conversations: “Participants want to act on climate change but want more information on climate change, the impacts of climate change and the actions they can take.” (5.1.12).

We therefore think the Plan should include more emphasis on engaging with the public and communities, and demonstrating a consistent government approach to climate change, in order to encourage behaviour change. Although this is discussed in the Draft Plan, there is little detail about specific policies or policy outcomes relating to behaviour change.

Behavioural changes

Specific examples where we believe there is scope for behaviour changes to give large emission reductions are:

- For transport, there has been no progress in reducing emissions to date, despite energy efficiency improvements in vehicles, yet the approach suggested is to continue to rely on further energy efficiency improvements for future emission reductions. In fact (9.3.6) any

behavioural change from private to public transport is dismissed as being limited by capacity (whereas Climate Conversations report strong support for improvements to public transport).

- For services, again emissions have been steady since 1990, despite improvements in building fabric and improvements in energy efficiency, so again we are concerned that further improvements in these areas may fail to deliver the anticipated emission reductions. Personal experience is of over-heated office buildings and wasteful use of lighting, giving scope for considerable savings from behaviour change.
- In agriculture, there is potential for substantial emission reductions from behaviour change – change of diet to less red meat (with associated health benefits), change to more seasonal, local and organic fruit and veg.
- Also in the domestic setting, there is much scope for behavioural change – for example by accelerating the switch to LED lighting, and reducing wasted energy.

In some areas Government policy is actually encouraging adverse behaviour change, e.g. by the proposed reduction in APD, and the respective spend on road improvements compared with cycle routes.

Engaging with Communities

There has been a lot of work done on the psychology of behaviour change, and this is covered to some extent in section 5.1 of the draft Plan. Changes are more likely if they have been identified by the individuals or by trusted messengers, rather than by unknown officials. The draft Plan requires change, and talks about financial incentives for change – but people need to be willing to change.

We have been successful in several applications to the Climate Challenge Fund, and greatly appreciate the support the fund has provided to community groups. However, even this fund is very tightly focussed on demonstrable emission reductions. This is effective in helping those already committed to behaviour change, but less helpful in opening conversations with those for whom climate change is a lower priority. We therefore suggest the general thinking set out in section 5.1 should be developed into a programme to help people identify and take actions to lower their own carbon footprints, and to help community groups to lower the barriers which make change difficult.

We also note that the changes anticipated in the draft Plan will have a profound impact on many small businesses, which are an important part of many communities. In general terms smaller businesses are less able to adapt to rapid changes, and we therefore suggest resources should be devoted to anticipating these changes and helping smaller businesses with re-training.

Electricity use

The draft Plan assumes that, by 2032, 40% of new cars and vans will be EVs. This seems undemanding, given the plans in Norway and the Netherlands to ban sales of petrol and diesel cars and vans by 2025, and we think it likely that the switch to EVs will happen faster than anticipated in the draft Plan. In parallel with this change, the draft Plan anticipates space and water heating in the residential, service and industrial sectors switching to low-carbon fuel, presumably mostly electricity (although hopefully using heat pumps). These two changes will very significantly increase the use of electricity unless strenuous efforts are made to reduce demands. We believe there is a high risk that it proves impossible to meet these increased levels of electricity demand from renewable generation. Coupled with the risks that CCS is not widely available by the late 2020's, as anticipated in the Plan, we believe there is a need for

more ambitious improvements to the energy efficiency of buildings, and additional policies to reduce the use of cars and vans.

Extrapolation from emission reductions to date

We note that, between 1998 and 2014, Scotland's GHG emissions on a territorial basis fell by 28.8%, whilst its carbon footprint, based on our consumption rather than production, fell by only 6.3%. It is most likely that this discrepancy arose from the movement of manufacturing processes from Scotland to other countries. We suggest this off-shoring of manufacturing is likely to slow down, and as a result it will become difficult to maintain the pace of emission reductions we have seen to date. We therefore believe greater efforts will be needed to achieve the further reductions in the draft Plan. In particular, we suggest the targets of 6% reduction in domestic heat demand from fabric improvements by 2032, and 10% reduction in the equivalent service sector heat demand, should be increased, and as noted above we believe there should be targets to reduce emissions from travel and agriculture as a result of behaviour change.

Sustainable economic growth

We note that the Scottish Government's central objective requires "increasing sustainable economic growth" (2.1.1). We strongly believe that it is impossible to have indefinite sustainable economic growth because of the finite amount of resources on the planet. Increasing levels of economic growth will also make the achievement of emission reductions more difficult. In our view it would be better to focus on increasing well-being rather than on economic growth. This change in emphasis would be consistent with the draft Plan's commitment to a circular economy, and to the focus on "reducing and re-using, in addition to re-cycling" (5.1.19) (in fact, we suggest this should be "... in *preference* to re-cycling"). This change in emphasis would also help to resolve many of the conflicts between Government policies.

Yours faithfully,

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