

Response to the Scottish Government consultation on the Climate Change Bill

Scottish Communities Climate Action Network

The Scottish Communities Climate Action Network is a volunteer run network of community-led organisations that are taking climate action. Through supporting each other and providing a channel to communicate with Government, we work for transformational change from the bottom up. We believe that it is at community level that everyone's creative energy and natural desire to create a better place to live can unleash the innovation necessary to transform our economic, political and social systems. Our 140 member organisations are all working in their own ways to bring people together to find locally appropriate solutions to decarbonise their communities.

We work to support these members through learning exchanges, skills training and networking events. We are exploring more effective ways of working and creating synergy between all those striving to build communities resilient enough to grasp the opportunity to build a different, fairer society that regenerates our communities as well as our environment. We work closely with the wider community sector and directly with the Scottish Government to lobby for supportive policy and physical infrastructure to empower community-led action.

CC Bill Consultation Response

1. Do you agree that the 2050 target should be made more ambitious by increasing it to 90% greenhouse gas emission reduction from baseline levels? Yes No (please explain your answer)

NO. The 2050 target should be more ambitious than the current Act specifies, but a 90% reduction is insufficient given the demands of climate science and climate justice. Given our historic responsibility for emissions, Scotland must be prepared to give a bold lead in delivering our fair share of the Paris Agreement. We believe that Scotland should aim to reach net-zero greenhouse gas emissions well before 2050.

Our new targets need to be set solely according to what the science demands and not by what our models currently show to be technically feasible or by what may seem more politically palatable in the short-term.

In fact, models such as that produced by the Zero Carbon Britain (see: <http://zerocarbonbritain.com>) project show that it would be quite possible to reach net-zero within two decades, with existing technology -given sufficient political ambition and leadership. And our communities are crying out for a new political narrative that emphasises well-being

over consumption, which highlights the positive opportunities to be gained by decarbonising our economy and which puts in place the supporting policy and physical infrastructure to unleash and empower community action.

Other countries, such as Sweden, have already set net-zero targets. This bill is an opportunity for Scotland to regain its leadership position and to lead by example.

2. Do you agree that the Climate Change Bill should contain provisions that allow for a net-zero greenhouse gas emission target to be set at a later date? Yes No (please explain your answer)

No. We believe that the new Climate Change Bill must set a net-zero target immediately.

3. a) Do you agree that the 2020 target should be for greenhouse gas emissions to be at least 56% lower than baseline levels? Yes No (please explain your answer)

Yes, we support a 2020 target of at least 56% lower than baseline levels.

Our understanding is that with a revised accounting system and updated estimates of baseline emissions, a 56% reduction by 2020 is almost equivalent to the original 42% target set in the 2009 Act. 56% does not therefore represent the increase in ambition that is required and 60% would be more appropriate. However, given that the new Climate Act is not expected to become legislation until 2019, the new Climate Change Plan (RPP3) is of more relevance here. We ask that the coming Plan yet to be published takes a more ambitious approach - especially with respect to empowering and supporting community-led action.

b) Do you agree that a target should be set for greenhouse gas emissions to be at least 66% lower than baseline levels by 2030? Yes No (please explain your answer)

No. Greater ambition is needed. Given the limited carbon budget that we have available, we should be striving to reduce emissions as rapidly as possible in the short-term rather than assuming a linear reduction to net-zero. This is likely to be much more effective in limiting global temperature rise.

The Fair Shares analysis suggests the UK should be aiming for reductions of between 65% and 75% by 2025 and 76% and 86% by 2030 [1]. We therefore urge the Scottish Government to set target of at least 80% emissions reductions by 2030

[1] <http://www.climatefairshares.org> and <https://www.foe.co.uk/sites/default/files/downloads/uks-fair-share-emissions-cuts-76425.pdf>.

c) Do you agree that a target should be set for greenhouse gas emissions to be at least 78% lower than baseline levels by 2040? Yes No (please explain your answer)

No – as explained above, we believe that we should be aiming to approach net-zero by 2040.

4. Do you agree that annual emission reduction targets should be in the form of percentage reductions from baseline levels? Yes No (please explain your answer)

Yes and No. Whilst percentage reductions from baseline levels are easier to communicate to the public, it is crucial that reporting is also against the 'fair' cumulative emissions budget for Scotland. We therefore suggest that the Bill should include a mechanism for reviewing whether fixed percentage targets are still in line with Scotland's cumulative emissions budget and advising adjusted targets as required.

5. Do you agree that annual targets should be set as a direct consequence of interim and 2050 targets? Yes No (please explain your answer)

Yes, so long as the interim and 2050 targets are set to take account of the need for rapid, early reductions and of the need to stay within our 'fair' carbon budget, as explained above.

6. Do you agree that all emission reduction targets should be set on the basis of actual emissions, removing the accounting adjustment for the EU ETS? Yes No (please explain your answer)

Yes, we agree that it makes sense to set targets on the basis of actual emissions. Removing accounting adjustments for emissions trading will make it clearer which sectors are meeting their contribution and will make it easier to communicate.

However, we are at risk of deluding ourselves if we focus solely on emissions produced in Scotland. The emissions that Scotland is responsible for through our consumption have hardly fallen since 1990. The new Bill should include a requirement to measure and report annually on the actual emissions that we are responsible for in Scotland through our consumption.

7. a) What are your views on allowing the interim and 2050 emission reduction targets to be updated, with due regard to advice from the CCC, through secondary legislation?

Yes, we support the possibility of **increasing** targets through secondary legislation. But any proposal to decrease targets should undergo the full scrutiny of Parliament as primary legislation.

b) What do you think are the most important criteria to be considered when setting or updating emission reduction targets?

Climate science, global justice and international legal frameworks, such as the Paris Agreement and the Sustainable Development Goals, must be the overriding factors in setting targets. We do not support removal of the reference to a 'fair and safe' cumulative emissions budget.

The new Bill should take a 'fairshares' approach, taking account of the legacy of our historic emissions and principles of social justice between peoples and across generations. It should be acknowledged that there is no 'safe' level of emissions given the existing impacts of climate change. Targets must also take account of Scotland's responsibility for emissions through our consumption of goods produced elsewhere.

8. a) What are your views on the frequency of future Climate Change Plans?

Every five years seems like an appropriate timeframe for full renewal of Climate Change Plans. However, there must be a mechanism for ongoing monitoring and evaluation of the success of policy, with annual revisions of each Plan so that it becomes a living document that can form the basis of each Programme for Government. A new Plan should be issued as soon as possible after Royal Assent of the new Bill.

b) What are your views on the length of time that future Climate Change Plans should cover?

Sixteen years seems like an appropriate timeframe but it is crucial that Plans avoid delaying effort to the later years and avoid reliance on speculative technologies. Every Plan should include a pathway to net-zero whilst keeping a main focus on early action within the next ten years.

c) What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?

We don't believe there is a need for Scotland to wait for the Paris Stocktake Process to develop strong Climate Change Plans. As 2018 will represent the last chance for the international community to align national ambitions with the physical imperative of sustaining a liveable atmosphere (to stay well below 2 °C), we urge the Scottish government to develop a radically ambitious plan for climate action to present to the world during the 24th Conference of the Parties of the UNFCCC (COP24) and re-establish itself as a true climate leader.

d) How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?

We support the extension of the period of Parliamentary scrutiny of the draft Climate Change Plan to 90 days at minimum as this is a complex, cross-sectoral exercise requiring a significant degree of expertise across Committees.

The Scottish Government should publish its final Climate Change Plan no later than 9 months following the publication of a draft Plan. It should also publish a report setting out how it has responded to each committee recommendation.

9. What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans?

We do not support the proposal as there is potentially a long time lag between missing a target and the preparation of the next Climate Change Plan. If the Plan is to be a living document that does not allow rollover under-performance, then action must be taken to get back on track as soon as possible. Any shortfalls against previous targets should be made up on an annual basis.

10. What are your views on these initial considerations of the impacts of the Bill proposals on Scotland's people, both now and in future generations?

The move to a post-carbon society creates a significant opportunity to rethink the purpose of the economy and the sort of Scotland we want to create. SCCAN's vision is of a fairer society that regenerates our communities as well as our environment. It is at community level that people's creative energy and natural desire to create a better place to live can unleash the innovation necessary to transform our economic, political and social systems, developing locally appropriate solutions to meeting local needs in a post-carbon Scotland.

We welcome the recent announcement of a Just Transition Commission and also support the intergenerational equity ask of Young Friends of the Earth Scotland and Stop Climate Chaos Scotland to adequately reflect the needs of future generations in Scotland and the rest of the global community in impact assessments. The Welsh Wellbeing of Future Generations Act may be instructive here: It clearly sets out duties on public bodies to take decisions factoring in the interests of future generations.

Any analysis should also take into account the impacts of the Bill on people outside Scotland, especially those most vulnerable to the effects of climate change, given the Scottish Government's repeated commitment to climate justice. Assessing impacts against the Sustainable Development Goals to which we have signed up, would be one effective way of doing this.

11. What are your views on the opportunities and challenges that the Bill proposals could have for Businesses?

The transition to a post-carbon economy could bring significant opportunities for new livelihoods and business, most obviously in re-localised food and energy economies.

Moving to smaller scale, low-carbon food production based on regenerative, organic methods, primarily focussed on meeting local needs, would open up many new opportunities for

meaningful livelihoods, in growing, processing and distribution -as well as bringing many co-benefits of improved health, enhanced biodiversity and rebuilding of soil carbon.

The massive programme of home refurbishment required to drive down domestic energy demand, along with development of decentralised, locally managed energy networks will create many new business and skilled job opportunities.

We must ensure that there is a planned Just Transition from high carbon industries and jobs to a zero-carbon economy, protecting workers' livelihoods. For example, existing skills and expertise in offshore oil and gas should be used for the rapid expansion of offshore renewable energy.

12 a) What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process? (Please give details of additional relevant sources).

The Environmental Report focuses on environmental impacts within Scotland's borders and fails to take account of Scotland's extra-territorial impact from consumption patterns as well as the impact of our production emissions on our global atmosphere. The assessment should be expanded.

b) What are your views on the predicted environmental effects as set out in the Environmental Report?

We agree that stronger climate targets will have positive effects on climatic factors and positive secondary effects on air quality, health and material assets. We agree that potential negative effects as a result of low carbon infrastructure should be avoided or reduced where possible through careful planning, reuse of existing assets and appropriate mitigation measures.

c) Are there any other environmental effects that have not been considered?

d) Do you agree with the conclusions and recommendations set out in the Environmental Report?

e) Please provide any other comments you have on the Environmental Report

13. Please use this space to tell us any other thoughts you have about the proposed Climate Change Bill not covered in your earlier answers.

The legacy of our responsibility for historic emissions places an obligation on Scotland to take a lead in decarbonising our economy. Fortunately we are blessed with abundant renewable resources so are well placed to develop radically ambitious plans for climate action and re-establish Scotland as a true climate leader.

Addressing Climate Change is the defining issue of our time and must become the central focus of Government. The new Climate Bill should ensure that the Climate Change Plan becomes a living document that is central to every Programme for Government. This will include aligning the Scottish Government's budget with its Climate Change Plan to make clear the contribution of each measure to achieving emission reduction targets.. As well as being a major challenge, Climate Change is also a huge opportunity to rethink the purpose of the economy and create a new political narrative focussed on wellbeing and creating a nation of empowered citizens and communities in line with the SCCAN vision*. If we stop confusing ends with means we can move away from an obsession with the mantra of 'sustainable economic growth' and design an economy suited to one planet living. A bold Climate Change Bill will create jobs, improve health and reduce poverty at home whilst ensuring that Scotland plays its part in limiting climate change globally.

Along with the other members of Stop Climate Chaos Scotland, we are calling for the new Climate Change Bill to:

1. **Cut emissions from our inefficient homes** and ensure that all homes have at least an Energy Performance Rating of 'C' by 2025.
2. **Support cleaner transport** and put in legislation the recent commitment to phase out fossil fuel cars by 2032.

Along with Nourish Scotland, we especially want the Climate Change Bill to consider how the farming sector can contribute to reducing greenhouse gas emissions and include the following policies:

- **A nitrogen budget for Scotland by 2020.**
- **Ambitious organic targets for Scotland.**
- **A strong target and more support for agroforestry in Scotland.**

There is huge potential for the farming sector to become part of the solution to addressing climate change through adoption of regenerative agricultural methods. We would suggest that a soil carbon accreditation scheme be investigated as a requirement for future farm support payments.

We also suggest that there should be review of the mechanisms for ensuring Public Bodies act sustainably and contribute to the renewed climate ambitions outlined in the Bill. Ratcheting the role of publicly-funded bodies is a vital message to the whole of Scottish society - public and private - that much greater levels of action are required to achieve the co-benefits associated with greater ambition in the bill:

- Healthier citizens through enhanced provision for sustainable active travel,
- Less morbidity through improved diet with less meat and more local vegetables,
- Warmer homes and workplaces with lower running costs leading to improved well-being.

***Vision for Scotland**

In February 2014, Scottish Communities Climate Action Network invited its members, community groups tackling climate change, to come together and share what they were working towards over the next 10 years or so. The vision below is a synthesis of members' aspirations:

Empowered Democratic Communities

- *We are a nation of active citizens with a vibrant system of small-scale local democracy*
- *Communities have access to local land and resources and are able to devise and implement local solutions to create low-carbon, resilient places.*

Vibrant Local Food Culture

- *The Scottish Diet is based on high quality local produce*
- *There is an abundance of skilled and esteemed small-scale local food growers and producers*
- *Local food growing is evident everywhere - city centres, abandoned land, temporary spaces*
- *Small-scale mixed farms and community woodlands are enhancing bio-diversity*
- *Organic food production and ethically reared livestock are the norm*
- *Locally controlled sustainable fisheries supply local markets*
- *Food waste is a thing of the past*

Effective Local Energy

- *Scotland has a world leading low carbon, local energy economy employing many people in locally owned enterprises*
- *Communities have a significant stake in energy generation and supply*
- *Locally managed smart grids, match local demand to local supply*

- *New build housing is zero-carbon and a massive programme to insulate older housing is nearly complete*
- *District heating is commonplace*
- *Fuel poverty is a thing of the past.*

Living Locally

- *We are travelling much less as we mostly have local livelihoods and most of what we need is available locally*
- *Superfast broadband is available in all areas and community work-hubs are commonplace*
- *Excellent cycle/footpath infrastructure and a fully integrated public transport system has minimised the need for private cars*
- *Convivial, high-density urban living has created social spaces that are safe for walking and cycling*

Waste Not

- *A thriving 'remake' economy means that 'waste' has now become a resource*
- *We value well-being instead of consumption*

Happy Healthiness

- *We are healthy and happy because of our nutritious diet, creative livelihoods, quality local environments, physically active lifestyles and increased local, social interaction*

Practical Training & Education

- *Education values practical skills and a deep connection to nature*
- *Facilitative leadership skills and sustainability are central to the curriculum*
- *Cross-generational knowledge exchange is celebrated*

<http://www.scottishcommunitiescan.org.uk>

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