



Evidence on Draft Climate Change Plan

Environment, Climate Change & Land Reform Committee

February 2017

Introduction

Stop Climate Chaos Scotland (SCCS) is a civil society coalition campaigning for action on climate change. Members include environment and international development organisations, student unions and trade unions, community groups and faith groups. We believe that the Scottish Government should take bold action to tackle climate change here at home and play its part in supporting climate justice around the world. We are grateful for the opportunity to share the views of the coalition on the aspects of the Draft Climate Change Plan which relate to the remit of this Committee.

Overview

- The Draft Climate Change Plan sets out a positive vision of a low carbon future which is cleaner, healthier and more prosperous. However, SCCS remains concerned that the Draft Plan contains little detail on how that vision will be achieved and therefore lacks credibility in its current form.
- The Draft Plan contains very few new policies, despite the UK Committee on Climate Change clearly setting out the areas where new policies or policy developments were needed as recently as September.
- While progress can be made on areas such as waste and peatland restoration under this Draft Plan the worst performing sectors will continue to perform poorly. Experts have repeatedly said that the transport, agriculture and heating sectors needed more action from Scottish Government. However, these are the weakest sections of the climate plan, offering little in emissions reductions and providing little in terms of credible, measurable policy.
- The Draft Plan is not measurable. Despite the welcome adoption of a whole energy system approach, the Plan does not clearly establish how policies will result in emissions reductions in each sector. In addition, some sectors contain almost no measurable outputs or timed milestones by which progress towards outcomes can be measured.

MATCH Criteria comparison

The MATCH criteria by which to judge the Draft Plan was developed by WWF Scotland and adopted by SCCS. The criteria ask if the Draft Plan is Measurable, Ambitious, Transparent, Credible and Holistic.

- **Measurable** – The Draft Plan is not measurable. It is not possible to gain an understanding of the relative contributions of policies to emissions reductions. In some areas, policies lack measurable milestones
- **Ambitious** – In some areas such as heat, the Draft Plan is very ambitious. However, there is a lack of credible policies with which to realise that ambition. In other areas such as energy efficiency, transport and agriculture, the level of ambition is disappointing.
- **Transparent** – The Draft Plan does not clearly explain how each policy or policy outcome contributes towards climate targets.
- **Credible** – The Draft Plan is not credible. Despite a welcome balance in favour of policies over proposals, the Draft Plan does not clearly show how all emissions targets will be met. In addition, the Draft Plan is overly reliant on voluntary measures, awareness raising and the actions of the UK Government and EU to achieve its aims.
- **Holistic** – The Draft Plan contains some useful assessments of the wider impacts of policies and proposals in each sector. Some further assessment of financial and social impacts would strengthen the Draft Plan in this respect.

Recommendations for improving the Draft Plan

Our recommendations are split into those which pertain to the whole Draft Plan and those which are sector specific policy recommendations.

Draft Plan recommendations

- The Scottish Government should ensure that every policy has sufficient detail to allow readers to assess the impact of that policy on meeting Scotland's climate targets or providing additional co-benefits.
- The Draft Plan should be amended to include more new policies, particularly in sectors which have historically underperformed such as transport and agriculture. This should include changing some proposals into policies.
- The Draft Plan should be amended to ensure that every policy outcome is measurable with clear expectations on outputs, milestones and outcomes.

Sector specific recommendations

- Transport: The Scottish Government should increase the funding for active travel in order to meet their own ambitious targets. SCCS recommends increasing funding from 2% to 10% of the overall transport budget.
- Transport: The Scottish Government should produce a credible plan as part of the Climate Change Plan to ensure that there are no new sales of petrol and diesel cars by 2030. This should be supported by new policies such as Workplace Parking Levies and Low Emission Zones, implemented in conjunction with local authorities, as well as support for people to switch to public transport, active travel or electric vehicles.
- Energy efficiency: The Scottish Government should support all homes to reach at least an EPC band 'C' by 2025. The roll out of the new Scottish Energy Efficiency Plan must set clear objectives, start earlier and be properly funded to deliver the transformational change which Scotland's homes and buildings require.
- Heating: Whilst the ambitions on heat in the Draft Plan are set very high, the policy action to deliver them is lacking. Every new home should have a connection to low carbon heating such as solar, heat pumps or district heating.
- Agriculture: The Scottish Government must stand by its previous commitment to implement compulsory soil testing and set out a clear timetable for its introduction. A clear timetable must be set for the introduction of carbon audits and a Nitrogen Budget for Scotland.

Development of the Draft Climate Change Plan (RPP3)

SCCS welcomes the regular discussions with civil servants and Ministers which members have had during the development of the plan, as well as the stakeholder event and a seminar on the TIMES model. The use of TIMES has allowed a more systematic approach to identifying emissions reductions pathways than the bottom up approach used for RPP1 and 2. We also welcome the acknowledgement of the need for climate justice to be embedded in the Draft Plan and in the Scottish Government's subsequent actions. The reference made to climate justice by the Cabinet Secretary is a positive development.

Climate change governance (including monitoring and evaluation)

The Draft Plan contains a chapter on monitoring and evaluation which contains a useful explanation of the proposed framework. The framework proposes to measure a range of outcomes, outputs and indicators and to report annually. It is not clear whether the framework will function effectively, given the lack of detail in many areas of the Plan. It seems unlikely, if the Draft Plan is left unchanged, that a monitoring and evaluation framework could adequately assess the progress of some policies.

For example, Policy Outcome 3 in agriculture aims to cut emissions from dairy and meat production, however no measurable outcome or figure for abatement is given. In the table of policy milestones for achieving this outcome, a single phrase is repeated each year up to 2021, with no numerical targets, after which there are no milestones set. More detail must be filled in by the time of the final Plan if the monitoring and evaluation approach is to be the effective step forward that it should be.

A new governance body is proposed (section 6.1.6) which will oversee the monitoring and evaluation of the Plan, its proposals and policies and resultant actions over time. However very little information is given about this body and it is unclear whether it will supersede any other existing groups or structures.

Finally, it is not possible to tell from the Plan how much expenditure is required to deliver policies. Future budgets must be developed with the Plan in mind and the Scottish Government should provide clarity on the extent to which they meet the commitments in the Plan.

Our asks – Governance, Monitoring & Evaluation

1. In order for the monitoring and evaluation framework to be credible, the level of measurable detail in each sector must be improved and published.
2. Further information on the proposed governance body is needed
3. Detail must be made available on planned expenditure in each sector

Resource use

The waste sector is a positive aspect of the Plan, focusing on policies rather than proposals and aiming to meet a statutory target ahead of time. More detail on specific numerical targets for reductions in landfill waste, emissions and food waste would add to the strength of this section.

Progress since RPP2

The waste sector has seen a 7.6 MtCO₂e (77.3%) fall in emissions between 1990 and 2014 – the largest percentage fall of any sector over this time period, contributing significantly to the achievement of climate targets so far. Recycling rates are up to 44% from 32% and household waste has decreased by 18% since 2007.

Appropriateness and effectiveness of the proposals and policies for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets

The Plan contains a target to reduce food waste by 33% but the pathway to achieving this is unclear at present. Similarly, the circular economy aspects of the Plan require further development. We expect to see this development through the Circular Economy Bill planned for later this year.

Appropriateness of the timescales over which the proposals and policies are to take effect

According to the timelines in the Plan, the proportional reduction in waste sent to landfill is expected to increase year on year up to 2025 but then level out at 32%. It would be useful to see further policy development to decrease landfilled waste even further beyond 2025.

Our asks – Resource Use

1. We wish to see a clearer policy package for achieving the target of 33% reduction in food waste
2. Any further development of plans for anaerobic digestion should take into account wider health, environmental and social impacts

Land use (including peatlands and land use by the public sector)

The Land Use (LULUCF) section of the Plan includes welcome commitments on peatland restoration and on tree planting. The Scottish Government has said that these will be funded, however greater clarity is required on the [mechanism](#) which will be used to disburse the funding. We favour the return of Peatland Action as the delivery body.

Progress since RPP2

RPP2 included a commitment to further research Blue Carbon. This does not appear in the Draft Climate Change Plan but we recommend that this is reinserted with a policy commitment to further understand the value of marine carbon sink habitats and developing mechanisms to protect and restore them.

Appropriateness and effectiveness of the proposals and policies for meeting the annual emissions targets and contributing towards the 2020 and 2050 targets

We welcome the target to restore 250,000ha of degraded peatland by 2032 but there needs to be clarity on how this will be delivered.

Similarly, the Plan includes a target to plant 15,000ha of trees by 2025. This is a welcome ambition, however it lacks some credibility given that the existing target of 10,000ha per annum has been repeatedly missed, with an average of just 6,800ha planted since the last RPP. It is not clear how the actions described in the Plan will counter this trend and see forestry increasing.

We welcome the aim to increase the amount of timber used in construction and the commitment to investigate how to achieve more tree planting on farms

Our asks – Land Use

1. A return of Peatland Action as the vehicle to engage land owners and fund restoration
2. More research into the full lifecycle analysis of GHGs from afforestation, in particular more research to understand the carbon implications for forest soils.
3. The right tree planted in the right place to optimise carbon sequestration and other benefits, and a preference for native broadleaved species with a long lifespan to lock carbon in living material for many decades.
4. Further research and development of a mechanism to restore and protect marine carbon sink habitats, also known as blue carbon habitats.

Behaviour change

The Plan contains a chapter on behaviour change as well as a detailed Annex covering the Scottish Government's Individual, Social, Material (ISM) model of behaviour change. We welcome the use of ISM and the Scottish Government's focus on behaviour change and the detailed example in the Annex is useful in understanding how ISM is being used in research. However, clearer evidence should be provided in other sections to show how the use of the ISM model has influenced the policies in the Draft Plan and how behaviour change is being considered at the system level.

For more information, please contact:

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