



Evidence on Draft Climate Change Plan

Rural Economy and Connectivity 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.

Summary

- 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 demonstrates very low ambition for the Transport and Agriculture sectors. For example, emissions reductions from Agriculture are set to be the lowest of any sector at just 12% or 0.9MtCO₂e by 2032. This falls far short of the 1.5MtCO₂e reduction recommended by the UK Committee on Climate Change.
- The Plan contains almost no new policies for the Transport and Agriculture sectors.
- In Agriculture, there are no policies set out beyond 2025, despite this Plan covering the period 2017-32.
- In Agriculture, planned emissions reductions are very dependent on voluntary measures, despite a commitment from the Cabinet Secretary that measures such as soil testing would be compulsory.
- Emissions from Transport have hardly fallen since 1990 and are only projected to fall by an average of 1.3% per year from 2017-2032 – well below the 3% annual reduction required by the 2009 Act.
- The Draft Plan is heavily reliant on market-led technological change and on actions by the UK Government or EU to reach its emissions targets. There are insufficient measures in place to manage demand or to encourage shift to more sustainable modes of transport.
- The goal of increasing tree planting from the current annual target of 10,000ha per year to 15,000ha by 2025 is very welcome. However, given that an average of just 6,800ha have been planted since the last RPP, without additional policy detail, this ambition lacks credibility.

Agriculture

The Agriculture section has a good narrative vision but contains no compulsory measures on actions such as soil testing or carbon audits; relies heavily on awareness raising to produce behaviour change amongst farmers and gives very little detail about timescales and milestones for delivery.

- *Progress since RPP2*

The number of Climate Change Focus Farms, used as demonstration farms to share best practise, has risen from four to nine since RPP2, achieving the goal of doubling the number.

The Draft Plan states that a proposal in RPP2 for 90% uptake in fertiliser efficiency measures has been superseded by a range of other measures including “the policy for compulsory soil testing” and “the proposal for a nitrogen budget for Scotland” (Table 14-19, Draft Climate Change Plan). Both compulsory soil testing and a nitrogen budget would be very welcome moves, however neither is explicitly set out as either a policy or proposal in the rest of the Plan. Clarity on whether the Scottish Government intends to introduce them as policies or proposals is essential.

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

The Agriculture sector is being expected to deliver approx. 0.9MtCO₂e of savings to 2032, however the UKCCC recommended that the sector could deliver 1.5MtCO₂e of abatement under its High Ambition scenario over the same period. This is the smallest emissions reduction of any sector at just 12% over the RPP period.

Whilst the Plan contains 14 policies in Agriculture, most of these relate to voluntary measures, awareness raising and further research rather than requiring farmers to make changes. This balance must be redressed for the Plan to be credible and for even the modest planned emissions reductions to be achieved.

Many policies commit to implementation only after consultation with farmers. Whilst it is important to raise awareness amongst farmers, there is also a need for the Scottish Government to provide leadership and milestones for what is expected. Regulatory backstops must be included in the Plan.

The planned marketing campaign on low carbon farming could be effectively replaced by support for organic farming which is already low carbon and has an Organic kite mark system in place.

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

The Agriculture section of the Plan contains no measurable indicators to show when the policies are expected to be delivered over time. The tables in this section showing ‘Policy Outcome over time’ contain words rather than numbers.

Our asks

1. Soil testing must be more clearly indicated as a compulsory measure with a clear timetable for roll out.
2. The Plan should include a clear mechanism for Carbon Audit roll out up to 2032 – with a regulatory backstop indicating the level of voluntary uptake expected before a measure is made compulsory.
3. The Plan should include a commitment to introduce a Nitrogen Budget for Scotland with targets which cover more than just on farm fertiliser use.
4. The Plan must clarify when policies will be implemented including measurable indicators over the whole RPP period up to 2032.

Forestry (and Land Use)

The Land Use (LULUCF) section of the Plan includes welcome commitments on peatland restoration and on tree planting. Clarity is needed, both on how the measures will be rolled out in a way which is learnt from previous programmes and on how they will be funded

- *Progress since RPP2*

Both RPP1 and RPP2 established targets for afforestation, with RPP1 including a proposal to increase tree planting to 15,000ha per annum. RPP2 then lowered this ambition but committed to planting no less than 10,000ha per annum. However, Table 13-6 in the Draft Climate Change Plan states that

an average of just 6,800ha of trees have been planted per year since RPP2, calling into doubt the credibility of the new 15,000ha target without significant policy action.

- *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 plant 15,000ha of trees per year by 2025, however it is not clear how the actions described in the Plan will achieve this target, given the failure to meet the existing target of 10,000ha per year. 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

1. Clarity is needed on how the 15,000ha per annum target for tree planting will be achieved.
2. More research is required into the full lifecycle analysis of GHGs from afforestation, including more research to understand the carbon implications for forest soils.
3. The Plan should commit to planting the right tree in the right place to optimise carbon sequestration and other benefits, and show a preference for native broadleaved species with a long lifespan to lock carbon in living material for many decades.

Transport

Over a quarter (28%) of all Scotland's emissions come from transport and these emissions have only fallen by just 2% since 1990. Therefore we had hoped to see ambitious new policies set out in this Plan. However, such policies are sadly lacking. The Draft Plan relies on market-led technological change for much of the planned emissions reductions in this sector and on actions by the UK Government or EU to deliver the policy outcomes which are expected to deliver the biggest emissions reductions.¹

Many of the Government-led actions needed to achieve significant reductions are either missing², underfunded³ or simply included as proposals⁴.

In addition, the Plan builds in expectations of significant increases in transport demand, without tackling the causes of demand such as the availability of public transport as highlighted by the Scottish Government's own behavioural research.⁵

- *Progress since RPP2*

Much of the progress since RPP2 which relates to policies is due to strengthened EU emissions standards for vehicles⁶ but there is welcome evidence of progress in the rollout of a network of charge points for electric vehicles.

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

This sector's annual emissions reductions are due to be less than the required 3% per year set out in the Climate Change Act.

¹ Policy Outcome 1 is expected to deliver 20% of all emissions savings in transport but is dependent on EU or UK Government action in 3 of the 4 policies needed to deliver this Outcome.

² Modal shift (e.g. moving from private car to public transport or active travel) is notably absent in terms of policies and proposals

³ The Plan expects the proportion of journeys taken by bicycle to increase from 1% in 2016 to 10% in 2020 without introducing any new funding or policies

⁴ Low Emission Zones and Workplace Parking Levies are both mentioned throughout the plan as ideas which could have a positive impact on cutting transport emissions (see 9.2.17) but are only listed as proposals, not policies

⁵ See 5.1.12 in the Draft Climate Change Plan

⁶ See Table 9-22 in the Draft Climate Change Plan

The ambition to increase the uptake of electric vehicles or ultra-low emissions vehicles is also disappointing, aiming for just 27% of new vehicle sales being ULEVs by 2030 compared with 65% recommended by the UK CCC.⁷ In the Netherlands and Scandinavia there are discussions ongoing about moving to 100% of new car sales to be electric by around 2030.

Parts of the Plan refer to Low Emission Zones (LEZs) and workplace parking levies (WPLs) as actions which “will [...] incentivise public transport and active travel, as well as reducing congestion and contributing to improved air quality⁸. However, neither is included as a policy despite being cited as ways of achieving planned emissions reductions. Both LEZs and WPLs should be included as policies in the Plan.

The Plan sets out an expectation that cycling rates will increase from 1% last year to 10% in 2020 but contains no new funds or policies to achieve this, instead maintaining active travel funding at its current level. This is not credible. SCCS and others have advocated for an increase in the active travel budget from 2% of the overall transport budget to 10% to support the necessary modal shift away from private car use and towards walking and cycling.

- *Appropriateness of the timescales over which the proposals and policies are to take effect*
Active travel funding is only planned up to 2021 with no detail beyond this point. Similarly, Policy Outcome 1 which accounts for around a fifth of planned emissions reductions only contains timed milestones up to 2021.
Policy Outcome 4, which aims to increase the proportion of the bus fleet which is low emissions, does not contain any policies yet it sets out clear targets for increasing the proportion up to 2032. More detailed policies are needed for this timetable to be credible. Policy Outcome 5, on reducing emissions at airports and ports, relies entirely on voluntary private sector action and has no timetable for delivery.

Our asks

1. Increase active travel budget to 10% in order to achieve the step change in active travel described in the CCP
2. Ensure APD remains at its current level to cut emissions, improve air quality & promote behaviour change
3. 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 achieved by embedding Low Emission Zones as a policy, rather than a proposal and adopting workplace parking levies as policy implemented through and operated by local authorities.
4. Introduce a more ambitious target for market penetration of ULEVs in line with UKCCC recommendations
5. Provide detail on the proportion of emissions reductions which are dependent on UK Government and EU decisions.

For more information, please contact:

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⁷ p73, Reducing emissions in Scotland: 2016 Progress Report, UK Committee on Climate Change

⁸ See sections 9.2.17 and 9.2.18