

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

SUBMISSION FROM WWF SCOTLAND

THE DRAFT CLIMATE CHANGE PLAN (RPP3)

SUMMARY

- **Overall the Draft Climate Change Plan (Draft CCP) is a significant disappointment,** and a missed opportunity to secure the benefits of a low carbon economy. WWF Scotland developed a set of criteria against which to judge the Plan (MATCH – Measurable, Ambitious, Transparent, Credible, Holistic)¹. The Draft CCP particularly fails to meet our Measurable, Ambitious, and Credible criteria:
 - 1. The Draft CCP is not CREDIBLE**

Although the plan presents an often strong description of a low carbon economy in 2030 there is a consistent absence of sufficient specific policies to ensure we operate within the carbon envelopes required by each sector. Several sectors within the Draft CCP are weakened by a reliance on existing policy effort despite the Draft CCP assuming a step change in emissions reductions in the coming years.
 - 2. The Draft CCP is not AMBITIOUS in the policy intentions it describes**

Despite repeated advice from the Scottish Government's independent advisors (the UK CCC) that more policy action is needed if future targets are to be hit, the Draft CCP does not present increased policy effort, apart from extensions to existing policy goals in forestry and peatland. In addition, in our view, the weakest sections of the Draft CCP are the Transport, Agriculture, and Residential & Services chapters, these are the same sectors where emissions have reduced least since 1990, and where the CCC has repeatedly said the need for new policy is most urgent.
 - 3. The Draft CCP does not describe MEASURABLE change**

The Draft CCP does not describe what contribution each individual policy and proposal is expected to make to the policy outcomes. In addition, many of the policies and policy outcomes are not SMART and cannot be monitored. This makes the plan very difficult to analyse, and, unless corrected, it will frustrate the ability of the Scottish Parliament and stakeholders to scrutinise its implementation.
- **Recommendations:** The Scottish Parliament should **recommend specific actions that would fill the many policy gaps that exist** in the Draft CCP. The final CCP should provide the necessary policy commitments to ensure both the transport and agriculture sectors reduce emissions as required by the Draft CCP. Priority suggestions within the REC Committee's remit should include:
 - 1. Transport:** The introduction of demand side measures (such as Workplace Parking Levies or Low Emission Zones); and introduce further incentives to support the growth of EV sales.
 - 2. Agriculture:** Should move away from a voluntary approach that has not been proven to be effective. E.g. soil testing should be made compulsory.
- **The final Climate Change Plan must also be complete.** All policy outcomes must be described according to the definition in the Draft CCP, i.e. they should be a measurable change on the ground and it should be clear what role each policy is expected to play in

achieving the policy outcomes included in the Draft CCP. The final monitoring framework should ensure all policies are presented with the predicted policy output that is specific and measurable. The final CCP should present complete policy outcome tables and the necessary cost data to inform implementation and allow for effective scrutiny.

TRANSPORT

Emissions from transport comprised 28% of Scotland’s emissions in 2014. By 2030 Transport will be the single biggest source of emissions in Scotland contributing more than 30% of total greenhouse gasses. Between 1990 and 2014 emissions from transport have fallen by just 3%, by 2030 the Draft CCP suggests they need to have fallen to approximately 29% below 1990 levels. While this clearly calls for acceleration on the historical rate of change it is approximately 20% less ambitious than the UK CCC’s recommended pathwayⁱⁱ.

The CCC pathway and the draft CCP pathway

There are some noticeable differences between the Transport section of the Draft CCP and the recommendations of the UK CCC. Some of this could be explained by the Scottish Government applying a different modelling approach. However, the significant difference in ambition between the two and the complete absence of certain policy solutions suggest that rather than being a consequence of the TIMES model it is a result of political constraints applied to the model during the development of the CCP. The table below provides a summary of some of the key differences between the two.

Draft CCP – Policy outcomes	CCC advice March 2016
<ul style="list-style-type: none"> • Emissions in 2030 are 9.4 Mt • Proportion of ultra-low emission new cars & vans registered in Scotland to reach 40% by 2030. • No predicted decrease in car travel kms 	<ul style="list-style-type: none"> • Emissions in 2030 are 7.3 Mt (a 22% greater reduction than the draft CCP proposes) • Proportion of new electric cars and vans in 2030 to be between 60 – 65%. (requires support of up to £1000 in 2030 – no funding support described in CCP beyond 2020.) • 12% reduction in car travel kms • Application of a 60mph speed limit on motorways and dual carriageways.

Recommendation: The final CCP should provide an explanation of the key differences between the pathway it sets out for transport, and the advice of the UK CCC. In particular, if no changes are made from the Draft, the final CCP should say why the CCP provides no policy to manage the growth in car kms as recommended by the UK CCC.

Credibility

The credibility of the transport pathway is undermined in the following ways:

1. A reliance on adoption of future EU emissions standards for new cars despite the uncertainty created by Brexit.
2. An assumption that a doubling of electric vehicle sales between 2016 and 2017 can happen in the absence of any additional policy effort and that EV sales will reach 40%

without new policies in place. In its March 2016 report the UK CCC said that stronger implementation was required to deliver necessary increased sales and that this should include preferential road access and free parking. The Draft CCP does not introduce policies to address either of these recommendations. The Draft CCP also requires that EV sales go from 27% in 2030 to 40% in 2032, again the Draft CCP does not describe the policy shift that will secure this acceleration.

3. The absence of most of the cost effective measures identified in a study for Transport Scotland by Aberdeen University and Atkinsⁱⁱⁱ. The difference between the conclusions in this report and the draft CCP are highlighted in the SPICE briefing on the draft CCP.^{iv} For instance, both the Atkins study and the UK CCC recommend applying speed restrictions on trunk roads and yet this approach is absent from the Draft CCP. Similarly, the research highlights the relative low cost of introducing a workplace parking levy such as is used in Nottingham and this only gets passing reference in the Draft CCP.

Recommendation: The final CCP should provide firm commitments to strengthen the incentive package for EVs so they become a more attractive purchase option. In addition the final CCP should set out how it describes the least cost pathway, if it continues to exclude the majority of least cost transport policy options.

Policy Gap

The transport chapter does not set out sufficient ambition in either policy or its description of the 2030 transport system to reassure stakeholders that the sector will operate within its emissions envelope. For instance:

1. The draft CCP only proposes to *consider* the provision of EV charging points in new build properties. This weak policy does nothing to reassure stakeholders that the policy approach has been designed to ensure transport emissions fall within the prescribed envelope.
2. The draft CCP is significantly less ambitious in terms of EV growth and in terms of managing growth in car km than the UK CCC advice. No explanation is given for these significant differences.
3. Many of the proposals are presented as vague possibilities of future action and don't offer any statement of ambition. Too many introduce possible future action by saying *consider*, or *investigate* or *evaluate the scope for*. These are not statements of intent that can be translated into future policy and in turn into future policy outcomes.
4. Rather than committing to introducing low emissions zones in multiple Scottish cities the CCP simply introduces a policy to evaluate the scope for urban wide low emissions zones. Again it is very difficult to attribute any emissions reductions to such a policy.

Recommendations:

- The final CCP should place greater emphasis on modal shift through a) introducing Work Place Parking Levy as policy; b) establishing Low Emissions Zones as a policy rather than proposal; c) setting out a freight consolidation strategy; d) and increased budget for active travel in line with meeting the 10% of journeys ambition.
- The final CCP should increase ambition on EVs to the CCC recommended level and introduce a clear package of policy incentives to support their roll out, including preferential road access and free parking.
- The final CCP should provide detail on the proportion of emissions reductions which are dependent on UK Government and EU decisions.

AGRICULTURE

Contribution of policies not Measurable

The Policy Outcomes in the Agriculture section of the Draft CCP are particularly vague and unspecific, they clearly do not meet our 'measurable' criteria. For example, Policy Outcome 1 in the Agriculture section simply says 'Farmers, crofters, land managers and other primary food producers are aware of the benefits and practicalities of cost-effective climate mitigation measures'; this is clearly not a SMART objective. It is not at all clear what measurable contribution the Scottish Government expects this policy outcome will make to achieving the emission reductions required in this section, it will also be impossible for the Scottish Parliament to monitor progress against this objective in a meaningful way.

Table 14-4 describes Policy Outcome 1 over time, suggesting that 200 farms will have free carbon audits per year, and that in 2018 the Scottish Government hopes to 'expose' an unspecified number of farmers to advice and information. The table shows nothing beyond 2021, even though the CCP is required by the Climate Change Act to show how all annual climate change targets up to 2032 are met. This is in sharp contrast to policy outcome tables elsewhere in the Draft CCP that, for example, provide describe a proportion of new car sales that are electric vehicles, on an annual basis.

If the Agriculture section provided these sorts of measurements of progress, the Scottish Government would be able to determine if and why they were exceeding or under-performing against projections. The presentation of measurable policy outcomes and policy output indicators also ensures the Parliament could effectively scrutinise progress and any proposed remedial measures. Without these measurable policy outcomes it is also impossible to determine whether the breakdown of policy outcomes, policies and proposals is sufficient to meet the emission reductions required. For this reason we cannot describe the section as a credible pathway for achieving the emission reductions that the Draft CCP requires from the agriculture sector.

Policy Gap

The Agriculture section continues to be over reliant on voluntary measures despite the fact the evidence suggests that to date this approach has delivered only modest emissions reductions^v. The CCC has repeatedly highlighted Agriculture as an area in which greater policy effort is required from Scottish Government. In its 2016 Progress Report the CCC recommended that the Scottish Government, "Include in the Climate Change Plan a stronger policy framework for agriculture emission reduction...This should include clear objectives, ways to monitor progress and how reductions will be achieved using the results from Scottish specific research where possible. If the government continues with voluntary measures they must be clear how they will be judged and what would trigger wider measures." The Draft CCP has not delivered on this CCC recommendation.

Most of the 'policies' within the Agriculture section of the Draft CCP relate to voluntary measures, awareness raising and further research rather than requiring farmers to make changes. This balance must be redressed for the CCP to be credible and for the anticipated emissions reductions to be achieved. There is a need for the Scottish Government to provide

leadership and milestones for what is expected. Regulatory backstops must be included in the Plan.

Recommendations:

- The Agriculture section of the Draft CCP should be properly completed, with policy outcome tables following the completed format that exists elsewhere in the Plan, and should show how the emissions reductions required from Agriculture will be met in all years through to 2032.
- Soil testing must be clearly indicated as a compulsory measure with a clear timetable for roll out.
- 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.
- The Plan should include a commitment to introduce a Nitrogen Budget for Scotland with targets which cover more than just on farm fertiliser use

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13 February 2017

ⁱ The full criteria is downloadable online here: <http://www.wwf.org.uk/sites/default/files/2017-02/A%20Plan%20to%20Match%20Scotlands%20Climate%20Ambitions%20%28FINAL%29%20%28Working%20Copy%29.pdf>

ⁱⁱ This assumes International aviation and shipping emissions are the same as 2014 in the UK CCC pathway, if they decline the difference between the CCC and the CCP will be even greater. See <https://www.theccc.org.uk/publication/scottish-emissions-targets-2028-2032-the-high-ambition-pathway-towards-a-low-carbon-economy/>

ⁱⁱⁱ See <http://www.gov.scot/Publications/2009/08/26141950/11>

^{iv} See <http://www.parliament.scot/parliamentarybusiness/103311.aspx>

^v The CCC said in its 2016 progress report that “Transport and agriculture will be the largest emitting sectors once power sector emissions fall rapidly in 2016, and current schemes are largely failing to deliver. There must be strong, credible policies for emission reductions in these sectors.” <https://www.theccc.org.uk/wp-content/uploads/2016/09/Reducing-emissions-in-Scotland-2016-Progress-Report-Committee-on-Climate-Change.pdf> (page 9)