

RURAL ECONOMY AND CONNECTIVITY COMMITTEE
SUBMISSION FROM STOP CLIMATE CHAOS SCOTLAND
THE DRAFT CLIMATE CHANGE PLAN (RPP3)

Introduction

1. Stop Climate Chaos Scotland 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 represent a broad and diverse cross section of Scottish society. This briefing is intended to inform Committee members of the views of the coalition on the aspects of the Draft Climate Change Plan which relate to the remit of the Committee.

Overview of the Draft Climate Change Plan

2. The Draft Climate Change Plan lacks detailed policies to realise the positive vision and ambition which it seeks to achieve and falls short of delivering the ambitious new policies for which we had hoped. Historically high emitting sectors such as transport and agriculture, which required bold new policies to address emissions, are still the weakest sectors in the Draft Plan. The Draft Plan fails to live up to the MATCH criteria which requires that it is Measurable, Ambitious, Transparent, Credible and Holistic.

Key weaknesses in Transport & Agriculture

3. The Plan demonstrates very low ambition for the Transport and Agriculture sectors. Anticipated emissions from Agriculture, for example are expected to fall by just 0.9MtCO₂e or 12% by 2032 - the smallest proportional reduction of any sector and significantly less than the UK CCC's recommendation of 1.5MtCO₂e reduction by 2030.
4. In Agriculture, there are no policies set out beyond 2025, despite this Plan being required by the Climate Act to show how all annual targets will be met for the period 2017-32.
5. 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.
6. 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.
7. In Transport, the plan fails to take action to capture the benefits of greater active travel and does nothing to support demand management in car travel. The plan is also unambitious about the take-up of electric vehicles through to 2030, assuming EVs will be only 27% of new car and vans sales in 2030. This compares to a UKCCC projection of 65% by 2030, and goals being discussed in the Netherlands & Scandinavia for 100% of car sales to be electric in around 203

Recommendations for change

8. Improve the credibility of the Draft Plan by redressing the balance of policies and proposals in favour of compulsory rather than voluntary measures, particularly in Agriculture.
9. Refocus the Plan on actions which can be taken by the Scottish Government and local authorities, rather than on those which rely on technological change or action by the UK and EU.
10. Clarify when policies will be implemented including measurable policy outcomes over the whole RPP period to 2032.
11. Turn proposals such as Low Emission Zones, Workplace Parking Levies into policies and commit to an increase in the active travel budget in order to make credible the ambition in the transport sector.

Forestry (and Land Use)

12. The goal of increasing tree planting from the current 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.

13. Clarity is needed on how the 15,000ha per annum target for tree planting will be achieved.

14. Commit to further research into the full lifecycle analysis of GHGs from tree planting

15. Commit to planting the right tree in the right place to optimise carbon sequestration and lock in carbon for a longer lifespan.

Agriculture

16. The Agriculture section of the Draft Plan sets out an attractive but vague vision and contains little measurable action to achieve it. It 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. Most of the policies relate to voluntary measures, awareness raising and further research rather than requiring farmers to make changes. This balance must be redressed and regulatory backstops introduced for the Plan to be credible. The Agriculture sector is expected to deliver savings of 0.9MtCO₂e to 2032, far below the UKCCC's recommended ambition of 1.5MtCO₂e. This is the smallest emissions reduction of any sector at just 12%.

17. Soil testing must be more clearly indicated as a compulsory measure with a clear timetable for roll out.

18. Include a clear mechanism for Carbon Audit roll out– with a regulatory backstop indicating the level of voluntary uptake expected before measure is made compulsory.

19. Commit to introducing a Nitrogen Budget that goes beyond farm fertiliser use.
20. Clarify when policies will be implemented including measurable indicators over the whole RPP period up to 2032.

Transport

21. Over a quarter (28%) of all Scotland's emissions come from transport yet emissions have fallen just 2% since 1990. 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, calling into question the credibility of the Draft Plan.
22. Many of the Scottish Government-led actions needed to achieve significant reductions are either missing, underfunded or simply included as proposals¹. 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.²
23. The ambition to increase the uptake of ultra-low emissions vehicles (ULEVs) is disappointing, aiming for just 27% of new vehicle sales being ULEVs by 2030. This falls short of the recommendation by the UKCCC which calls for a 65% uptake by 2030.³ Goals of achieving 100% of new car sales as ULEVs by 2030 are being considered in the Netherlands and Scandinavia. The Plan sets out an expectation that cycling rates will increase from 1% last year to 10% in 2020, yet it only maintains active travel funding at its current level up to 2021 with no detail beyond this point. This is not credible. Active travel funding accounts for just 2% of the transport budget, compared with the 10% advocated by SCCS and others.

24. Increase active travel funding from 2% to 10% of the transport budget in order to achieve the step change in active travel described in the Draft Plan.
25. Ensure APD remains at its current level to cut emissions, improve air quality & promote behaviour change
26. Promote demand management through firm commitments to embed Low Emission Zones and workplace parking levies as policies, rather than proposals
27. Introduce a more ambitious target for market penetration of ULEVs, at least in line with UKCCC recommendations
28. Provide detail on the proportion of emissions reductions which are dependent on UK Government and EU decisions.

Stop Climate Chaos Scotland
6 February 2017

¹ 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

² See 5.1.12 in the Draft Climate Change Plan

³ p73, Reducing emissions in Scotland: 2016 Progress Report, UK Committee on Climate Change