

Climate Change Bill Consultation Paper

1. INTRODUCTION

1.1 In June 2017, The Scottish Government launched a consultation on proposals to strengthen the ambition and strategic framework for action to reduce greenhouse gas emissions in Scotland. The proposals for a new Climate Change Bill will amend only those parts of the 2009 Climate Change (Scotland) Act that relate to emission reduction targets and associated reporting duties. The closing date for the Consultation is 22nd September 2017.

2. CONSULTATION

- 2.1** The 2009 Act is structured around a 2050 target to reduce greenhouse gas emissions by at least 80% from baseline levels, while seeking to boost productivity, competitiveness and growth. The 80% target at the time was considered appropriate in 2009 to limit global temperature rise above pre-industrial levels to near 2°C. However, the 2015 UNFCCC Paris Agreement has strengthened global ambition and seeks to limit global temperature rise in this century to 1.5°C. Advice to the Scottish Government from the Committee on Climate Change (CCC) questions if 80% reduction is enough and suggests increasing the target from 80% to 90% by 2050 to be more consistent with a 1.5°C scenario.
- 2.2** The UNFCCC Paris Agreement sets a goal of reaching net-zero global greenhouse gas emissions during the latter half of the century, however the CCC has advised the Scottish Government that the evidence is not available to set a domestic net-zero emissions target at the present time. The Scottish Government therefore proposed to set a net-zero emissions target for the second half of the century, subject to regular reviews of the evidence.
- 2.3** The 2009 Act set a single interim target for emissions reduction of at least 42% by 2020. The Scottish Government proposes, in line with the CCC's advice, to update the interim target for 2020 to at least 56%, and to set new interim targets for at least 66% in 2030 and at least 78% in 2040.
- 2.4** The 2009 Act makes provisions for annual emission reduction targets to be set every year up to 2050. These annual targets are currently specified as fixed amounts of greenhouse gas emissions, measured in tonnes of carbon dioxide equivalent, and are set in five year batches through secondary legislation. The Scottish Government proposes, in line with the CCC's advice, to specify the annual targets in the Bill in the form of percentage reductions from baseline levels to ensure that annual and interim targets remain consistent with one another.
- 2.5** The 2009 Act's emissions reduction targets are set on the basis of "adjusted" emissions, which takes into account the operation of the EU

Emissions Trading Systems (ETS). The CCC advise that all targets in the Bill should be based on actual emissions in Scotland, by removing the EU ETS adjustments, as this will increase the transparency of measuring progress to targets. These proposals will not change how the EU ETS operates in practice.

- 2.6** The 2009 Act allows for limited updates to annual and interim 2020 targets through secondary legislation, but does not include provision to update the 2050 target. It is proposed that updates to both the interim and 2050 targets should be possible through secondary legislation, subject to a suitable set of criteria and advice on these matters from the CCC.
- 2.7** SEStran is currently identified as a “major player” under the 2015 Act and required to report on progress and compliance with the climate change duties. The most recent draft Climate Change Plan for the period 2017-2032 was laid before Parliament in January 2017¹ and SEStran submitted a response to the call for evidence².
- 2.8** The consultation paper highlights a series of 13 questions relating to updating the target ambition overall and interim 2030 and 2040 targets amongst other target matters; measurement of actual emissions; procedures for reviewing targets and reporting on policies and proposals; assessing the wider impacts of the proposals and an opportunity for respondents to raise other issues around the proposed Climate Change Bill.

3. COMMENTS/ SUGGESTED RESPONSE

- 3.1** SEStran welcome the ambition for Scotland to reduce greenhouse gas emissions by at least 90% from baseline levels by 2050 in the proposed Climate Change Bill.
- 3.2** Due to the current rate of change and as transport has made less progress relative to other sectors since the 1990 baseline, the proposals will exert a significant amount of pressure on the transport sector to decarbonise and modally shift current mobility patterns. This will be a challenge for all sectors but especially in our view, transportation, given long-standing behavioural habits, current fuelling technologies and long lead-in times for consumer purchasing habits to change in terms of asset renewal if targets are to be realised.
- 3.3** The draft RPP3 published in January 2017 envisaged a future where transport emissions will have reduced by around a third by 2032, through the wide-scale uptake of low carbon vehicles, enhanced freight logistics and measures such as low emission zones. However, the CCC highlighted there has been less progress on reducing transport emissions relative to other sectors. In 2014, transport emissions (including those from international aviation and shipping) amounted to 12.9 MtCO₂e, marginally below the

¹ <http://www.gov.scot/Resource/0051/00513102.pdf>

² http://www.parliament.scot/S5_Rural/SEStran.pdf

1990 baseline figure of 13.3 MtCO₂e. Currently, transport accounts for 28% of total Scottish emissions. Within that long-term profile, we have seen significant reductions more recently: since transport emissions peaked at 14.9 MtCO₂e in 2007, they have fallen year on year by a total of 2.0 MtCO₂e. This is a 13% reduction in seven years. The ultimate goal by 2050 is that Scotland will be free from harmful tailpipe emissions from land transport, with other transport modes decarbonising at a slower pace, resulting in a healthier, more active population.

- 3.4** Given the predicted increase in population we should balance supply side measures with demand restraint to achieve emissions goals. SEStran has a successful and ever-growing Liftshare scheme and it would be welcome if further proposals and policies could be considered alongside a recognition of the role of RTPs in promoting it. The increase in lift-sharing opportunities could have a related co-benefit in terms of potential inclusion and accessibility impacts across urban-rural geographies. However, the Draft Energy Strategy and RPP3 focus on reducing the emissions impact of individualised modes of transport, must not implicitly or inadvertently be allowed to strategically promote greater use of individual motorised modes over collective or active modes and so potentially contribute to the further decline of bus or rail modes of transport. The increase in lift-sharing opportunities could have a related co-benefit in terms of potential inclusion and accessibility impacts across urban-rural geographies. There is a potential equity impact on those, who in the future despite interest-free loans, can't afford or access for other reasons individualised ULEVs.
- 3.5** It would be welcomed going forward to also consider in greater detail a wider range of potential demand side interventions and the impact these could have on potential latent demand for transportation generated by the long-term achievement of inclusive growth in Scotland which may continue for the near future to generate unsustainable travel practices prior to the impact of supply side policies and proposals outlined in RPP3 being able to generate the emissions reductions planned for them. It may also generate externalities in terms of congestion with economic albeit much reduced environmental externalities in future years, which could impact on economic performance and the resultant ability to resource further emissions reduction proposals and policies
- 3.6** It is recognised that there is a clear pick up in terms of ULEVs registered in Scotland but there is still a significant gap between that figure and other conveniently fuelled vehicles. There is a requirement for clear public leadership on this matter to drive behavioural change and instil in all consumers that they can confidently buy and drive ULEVs over the next 10-15 years. This will be critical if transport is to meet its share of the 2030 "all-Energy" target outlined in the Draft Energy Strategy and the 90% reduction target in the proposed Climate Change Bill.
- 3.7** In terms of transport, SEStran believe that Regional Transport Partnerships offer a clear route for delivery of regional low-carbon outcomes and will engage with others to co-design on policies that deliver improvements to

collective modes of transport and resource the maintenance and adaptation of existing networks to climate change and increased demand.

4. CONCLUSION / RECOMMENDATIONS

- 4.1** The board are invited to comment on the current Climate Change Bill consultation over the next 2 months ahead of a tabling of a proposed final SEStran response for agreement at the September Board meeting.

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Projects Officer
11th August 2017

Annex 1 – List of Consultation Questions

Policy Implications	The proposed Climate Change Bill could deliver significant change to the transport policy context through a more ambitious national target.
Financial Implications	Need for significant infrastructure and new technology.
Equalities Implications	Moving to electric cars could impact on certain socio-economic groups.
Climate Change Implications	Need for further action to increase modal shift and decarbonise the transport sector.

Annex 1 – List of Consultation Questions

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)
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)
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)
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)
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)
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)
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)

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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)
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?
b) What do you think are the most important criteria to be considered when setting or updating emission reduction targets?
8. a) What are your views on the frequency of future Climate Change Plans?
b) What are your views on the length of time that future Climate Change Plans should cover?
c) What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?
d) How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?
9. What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans?

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?

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

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).

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

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.