

Response ID ANON-HDX-1TS1-N

Submitted to **Climate Change Bill**
Submitted on **2017-09-22 14:04:39**

Proposals on updating target ambition

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

Please explain your answer:

Whilst an increased target of 90% is welcome, this is not a strong enough target for 2050. The Scottish Government must set a target of a 100% reduction in carbon emissions by 2050. A 90% reduction in emissions is not in line with what is needed to deliver the UK's fair share of the Paris Agreement, given our historical responsibility for emissions. We do not accept that a 90% is at the upper limits of what is possible to achieve, as this does not take into account the development of technologies in the coming years which will help to achieve a rapid reduction in carbon emissions.

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

Please explain your answer:

Yes, but a net-zero target should be being set now for 2050.

3a Do you agree that the 2020 target should be for greenhouse gas emissions to be at least 56% lower than baseline levels?

Yes

Please explain your answer:

3b 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

Please explain your answer:

This target for 2030 is only marginally higher than the previous target and needs to be updated accordingly to reflect the increased ambition of a 100% reduction in emissions by 2050. We support the call to increase the 2030 target to a 77% reduction in emissions compared to 1990 levels.

3c 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

Please explain your answer:

The 2020 target should be updated accordingly to reflect the increased ambition of a 100% reduction in emissions by 2050. We support the call for a 90% reduction in emissions by 2040.

4 Do you agree that annual emission reduction targets should be in the form of percentage reductions from baseline levels?

Yes

Please explain your answer:

5 Do you agree that annual targets should be set as a direct consequence of interim and 2050 targets?

Yes

Please explain your answer:

Actual Emissions

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

Please explain your answer:

Reviewing Targets and Reporting on Policies and Proposals

7a 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?

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? :

This sounds acceptable, as long as secondary legislation is not used to weaken the Climate Change Act.

7b What do you think are the most important criteria to be considered when setting or updating emission reduction targets?

What do you think are the most important criteria to be considered when setting or updating emission reduction targets?:

No views.

8a What are your views on the frequency of future Climate Change Plans?

What are your views on the frequency of future Climate Change Plans?:

The current frequency seems appropriate. However, what is more important is that the Climate Change Plans set out strong and effective 'Policies' which are then delivered, rather than simply classifying the more ambitious actions as 'Proposals' which are not required to be delivered.

8b What are your views on the length of time each Climate Change Plan should cover?

What are your views on the length of time each Climate Change Plan should cover?:

The current period seems appropriate. However, it is vital that the latter years of the Climate Change Plans are not used to backload effort on emissions reductions to the later years of the Plan, as has happened in previous plans. As cumulative emissions is critical (the 'area under the curve'), such an approach would risk failing to meet emissions reduction targets.

8c What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?

What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?:

We are happy to support the view of Stop Climate Chaos Scotland on this matter.

8d How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?

How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?":

Parliamentary Committees raised concerns that they did not have enough time to gather all the evidence necessary to make recommendations on the Climate Change Plan. Given that the Climate Change Plan is a complex and cross-cutting piece of legislation, we support the call to extend the Parliamentary consideration to 90 days.

9 What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans?

What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans? :

We are happy to support the view of Stop Climate Chaos Scotland on this matter.

Accessing the wider impacts of the proposals

10 What are your views on these initial considerations of the impact of the Bill proposals on Scotland's people, both now and in future generations?

What are your views on these initial considerations of the impact of the Bill proposals on Scotland's people, both now and in future generations?:

In so far as they are measures to head off climate change, the most serious threat facing humanity, they are uniquely positive.

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

What are your views on the opportunities and challenges that the Bill proposals could present for businesses?:

Making serious reductions in carbon emissions presents an opportunity for the Scottish Government to boost sustainable economic growth through sustainable transport. Scotland is home to world-leading bus companies and manufacturers (e.g. First, Stagecoach, Alexander Dennis); by investing in and supporting low carbon this sector, the Scottish Government can simultaneously cut carbon emissions, achieve a modal shift to sustainable transport and boost sustainable economic growth.

12a 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)

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)::

No views.

12b What are your views on the predicted environmental effects as set out in the Environmental Report?

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

No views.

12c Are there any other environmental effects that have not been considered?

Are there any other environmental effects that have not been considered?:

No views.

12d Do you agree with the conclusions and recommendations set out in the Environmental Report?

Do you agree with the conclusions and recommendations set out in the Environmental Report?:

We are pleased that the SEA Environment Report supports "greater policy alignment of action to reduce GHG emissions with wider Scottish Government policy objectives". At present, there is a complete lack of alignment of the Scottish Government's spending on transport and their wider ambitions. For example, the decision to prioritise the provision of new road infrastructure (e.g. spending £6 billion on the dualling of the A9 and A96 roads), with the resultant impact of generating new private car use and the damaging of the prospects for rail freight runs in complete contradiction with the Government's wider ambitions to reduce greenhouse gas emissions, reduce congestion, reduce inequalities, reduce air quality, achieve sustainable economic growth and achieve a modal shift to sustainable transport. The Government's infrastructure investment desperately needs to be aligned with sustainable transport to achieve these aims.

12e Please provide any other comments you have on the Environmental Report.

Please provide any other comments you have on the Environmental Report.:

No views.

Other issues

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.

Please use this space to tell us any other thoughts you have about the proposed Climate Change Bill not covered in your earlier answers.:

Given the transport is now the largest source of carbon emissions, and next to no progress has been made to reduce emissions, there is a need to set specific measures to tackle transport emissions. Despite the recent Programme for Government setting out some welcome policies and targets to reduce carbon emissions from transport, there is much more that needs to be done to develop a low carbon transport system. We recommend that the Climate Change Bill include requirements for:

- All parts of the transport sector to have specific plans to reduce their emissions. This should include the most polluting form of transport, aviation, which has been allowed to grow in an uncontrolled fashion, even before the £300 million annual tax cut which Scottish Ministers irresponsibly intend to provide to this sector by means of abolishing Air Departure Tax.
- The Government's Infrastructure Investment Plan to reflect the Government's stated aim to achieve a modal shift to sustainable modes of transport
- The Scottish Budget to be aligned with the Climate Change Plans and carbon reduction targets (as proposed by Stop Climate Chaos Scotland).

About You

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Transform Scotland

Please specify organisation type (if applicable):

Third sector organisation

Other – please state::

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact

you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: