



CLIMATE CHANGE (SCOTLAND) BILL

Interim submission to Scottish Parliament Transport, Infrastructure
Climate Change Committee

Wednesday 4th February 2009

1. Introduction

- 1.1 Transform Scotland is the national sustainable transport alliance. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; local environment and transport campaign groups; and individual supporters.
- 1.2 We strongly welcome the principle of Scottish climate change bill and the aspiration of the Scottish Government that Scotland lead the way on reducing climate change emissions.
- 1.3 We are a member of Stop Climate Chaos Scotland (SCCS), and are in broad agreement with the evidence presented by SCCS to the TICC Committee at its meeting held on 3rd February 2009.
- 1.4 We are particularly concerned with four elements of the Bill as currently drafted, and we set out our views on these matters in §4 below. This paper represents our interim view on the Bill. We intend to respond to the TICC Committee's call for views in full before the 27th February deadline.

2. Transport's current contribution

- 2.1 In 2006, the Scottish transport sector was responsible for 24.4% of all greenhouse gas emissions.¹
- 2.2 It is likely that this underestimates the impact of the Scottish transport sector. As expressed by the UK Department for Transport in 2007, government estimates of the impact of the transport sector "are likely to be an understatement of the full climate impact of UK related transportation [because of] the full climate impact of aviation emissions at high altitudes".²
- 2.3 Transport is the principal sector where emissions continue to rise. Greenhouse gas emissions from the Scottish transport sector rose by 14.3% between 1990 and 2006, whereas all Scottish emissions fell by 12.3% over this same period.³ Clearly, if the transport sector played its part in reducing emissions then there would be a significantly better chance of hitting future targets.
- 2.4 The current level of emissions from the transport sector alone is currently above the total level of emissions that can be emitted under the 2050 target level. In 2006, total Scottish transport emissions were 4.08 MtCe,⁴ while the 2050 target will require emissions from all Scottish activity to be below 3.81 MtCe.⁵ Hence, current transport emissions represent 107% of the total emissions allowable from all Scottish activity in Scotland in 2050 under the target proposed in the Bill.

¹ NAEI (2008) - <http://www.airquality.co.uk/archive/reports/cat07/0809180941_DA_GHG1_1990-2006_v1r.xls> and <http://www.airquality.co.uk/archive/reports/cat07/0811180855_International_aviation_and_shipping1990-2006_final_v5.xls>. This figure is for all transport emissions (including, e.g., aviation and shipping). It is calculated as 15001 tCO₂e (transport emissions) divided by 61359 tCO₂e (total emissions including international emissions).

² Department for Transport (2007): *Low Carbon Transport Innovation Strategy*, §2.5. <<http://www.dft.gov.uk/pgr/scienceresearch/technology/lctis/lowcarbontis?page=5#a1010>>. Note that this quote refers to UK emissions, but the argument holds equally for Scottish aviation emissions.

³ NAEI figures. Transport emissions were 13128 tCO₂e in 1990 and 15001 tCO₂e in 2006. Total emissions including international emissions were 70002 tCO₂e in 1990 and 61359 tCO₂e in 2006.

⁴ NAEI report total Scottish transport emissions in 2006 as 15001 tCO₂e, or 4.08 MtCe.

⁵ NAEI report total Scottish emissions in 1990 as 70002 tCO₂e, or 19.07 MtCe. 20% of this baseline figure implies a 2050 target of 3.81 MtCe.

3. Current transport priorities

- 3.1 Current Scottish transport expenditure priorities are systematically biased towards large infrastructure projects; current priorities are, on the whole, contrary to achievement of greenhouse gas emission reduction in the transport sector.
- 3.2 The proposed Scottish Budget 2009-10 sets out a large increase in spending on motorways and trunk roads, whilst support for existing public transport networks is static or in decline, and funding for the most sustainable modes of travel - walking and cycling - remains at the pitifully low level of £20m per annum (around 1% of the entire transport budget).
- 3.3 In December 2008, the Scottish Government published the *Strategic Transport Projects Review (STPR)* and its *National Planning Framework for Scotland 2: Proposed Framework (NPF2)*. STPR, amongst other things, sets out a £9 billion spending programme on roads, while NPF2 provides for airport expansion and a £2.1 bn Second Forth Road Bridge.
- 3.4 Even if we accept the optimistic claim that the STPR projects will cut emissions (a 1% cut by 2022 on business-as-usual is asserted), this programme is not compatible with the climate change trajectories set out in the Bill, even in its current state. Current forecasts for the year 2022 indicate that, in the absence of significant technological or behavioural change, total road transport carbon emissions will increase from 2005 levels by some 10%. This is fundamentally at odds with the Government's climate change ambitions: a 10% increase in emissions from the transport sector (at 2022) is patently not compatible with the acknowledged requirements for deep cuts in total emissions (by 2020).

4. Specific comments on the Bill

4.1 The Bill must set annual emission reduction targets of at least 3% from 2010

- 4.1.1 Bill §3 (2) (b): The Bill allows the Government the option of setting emission reduction targets for the period up to 2020 that would barely reduce emissions during this period (or continue with business-as-usual reductions of approximately 1% per annum as seen across the period 1990-2006).
- 4.1.2 The interim target (50% reduction by 2030) is similarly unacceptable; it compares unfavourably with the UK Committee on Climate Change's Intended budget (42% reduction by 2020). We support the SCCS recommendation of an interim target of 50% reduction by 2020.
- 4.1.3 It is imperative that the Bill establish annual emission reduction targets of at least 3% from 2010, not just from 2020, and that the interim target be amended accordingly. This would allow Scotland to keep its cumulative emissions within sustainable levels; an early start in delivering emission reduction would also help focus minds in sectors - such as transport - that are currently failing to contribute.

4.2 The Bill must include International Aviation and Shipping from 2010

- 4.2.1 Bill §14: The Bill fails to include emissions from International Aviation and Shipping (IAS), instead providing only that the Scottish Ministers "may" make provision for this at a later date.
- 4.2.2 This is not in accordance with the statement made by the Cabinet Secretary for Finance and Sustainable Growth John Swinney MSP on 27th October 2008:⁶

"This Government has taken the bold decision to include emissions from international aviation and shipping within its targets. Scotland benefits greatly from international trade and travel and we believe it is right to take responsibility for the Scottish share of these emissions."

⁶ Scottish Government news release 'Tackling climate change', 27/10/08. <<http://www.scotland.gov.uk/News/Releases/2008/10/27131648>>. Retrieved on 03/02/09.

4.2.3 Given the rapid increase in emissions from the aviation sector, the omission of IAS emissions would damage the credibility of the Bill.

4.2.4 The Bill should be amended to specifically include IAS emissions from the start.

4.3 The Bill must establish a duty on all public bodies to reduce emissions in line with the national targets

4.3.1 Bill Part 4: The Bill fails to place upon public bodies a duty to reduce climate change emissions, providing only that Ministers “may” choose to do so at a later date.

4.3.2 The Bill should be amended to establish a duty upon *all* public bodies to reduce emissions in line with the national targets.

4.4 The Bill must include mechanisms for enforcement of the emission reduction targets

4.4.1 The Bill contains no mechanisms for enforcement. As such, we question what will make Scottish Ministers (and public bodies) comply with the emission reduction targets that are set.

4.4.2 We would like to draw the Committee’s attention to the example of waste water and drinking water quality. Both of these are regulated and enforced by specific bodies. This mechanism has proved a highly successful model in helping meeting targets for water quality, and the meeting of climate targets will require similar levels of scrutiny and sanctions.

4.4.3 The Bill should be amended to include measures for effective enforcement of the targets.

5. Conclusions

5.1 The Bill is generally welcome, but requires improvement if there is any chance of action being taken to reduce climate change emissions within Scotland by 80%. Specifically, we recommend:

- The Bill must set annual emission reduction targets of at least 3% from 2010
- The Bill must include International Aviation and Shipping from 2010
- The Bill must establish a duty on all public bodies to reduce emissions in line with the national targets
- The Bill must include mechanisms for enforcement of the emission reduction targets.

5.2 More fundamentally, the Bill must be followed by a fundamental review of all existing and new policy decisions, and new legislation, in order that they comply with the requirements of the Bill. In essence, we require the Government to produce a national plan for emission reduction.

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