

# Scottish Association for Public Transport

## Response to Climate Change (Scotland) Bill

February 2009

**Q1 Targets** To take account of the recommendation in the First Report (Dec., 2008) of the UK Independent Committee on Climate Change for steeper cuts in greenhouse gas emissions by 2020, the Bill should be amended to include a target of 40% cuts on 1990 by 2020 (equivalent to 30% cuts on 2005) exclusive of international movement rising to an 80% target by 2050 inclusive of international movement

**Q2 Annual Targets** The Association queries the concept of annual targets since general economic fluctuations produce year to year changes in emissions separable from policy actions. It suggests that secondary legislation should specify targets for the five years 2011-15 and 2016-20 compatible with the aim of 40% cuts by 2020

**Q3 Annual Percentage Cuts from 2020** Bill should replace annual percentage cuts with a requirement for government to set percentage cuts for each following decade five years before the start of the decade. To meet the aim of an 80% cut by 2050 extended to include attributions related to movement to and from Scotland, there should be a further indicative cut of one-third between 2020 and 2030 with similar cuts in each of the two following decades.

**Q4 Carbon Trading** The Association, in common with the UK Committee on Climate Change, has strong reservations about procedures allowing Scotland to count as savings any significant amount of savings made outwith Scotland. There is a risk that political factors and low prices for carbon will dilute the incentives for the steeper cuts in greenhouse gas emissions required in all countries. Direct taxation of fossil fuels (less allowances for effective carbon capture and storage) is likely to be a more effective policy instrument as part of a package requiring the proceeds of such taxation to be used to reduce other taxation and provide investment incentives for shifts to greater energy efficiency, energy conservation and greater reliance on alternative fuels (The Association has already raised this issue in evidence to the Calman Commission)

**Q5 Calculation of Scottish emissions** Emissions should include all emissions from Scottish sources plus, as proposed, amounts attributable to Scotland from international aviation and shipping. There should also be consideration of whether the following attributions should be added:-

- a) emissions arising from manufactured imports consumed in Scotland (with corresponding cuts in the emissions of exporting countries)
- b) emissions related to movement of passengers and goods between Scotland and other parts of the UK e.g. UK domestic aviation and other UK goods and passenger movement (with corresponding cuts in emissions otherwise entirely attributed to other parts of the UK) [in practice, UK domestic aviation may be the only area of internal UK movement to merit early attribution]

**Q6 Scottish Committee on Climate Change** The Bill should include powers for such a Committee but, in practice, this function could be handled by arrangements within the existing UK Committee at least for the next ten years

**Q7 Reports to Scottish Parliament** – expand to include means to enforce recommendations

**Q8 Duties on public bodies** – no added comment

**Q9 Reports on Adaptation** – should be altered to make clear that Mitigation is included  
See also comment on Q20

**Q10 Muirburn and Q11 Forestry** - no added comment

**Q12, 13 & 14 Energy Efficiency/Conservation** - welcome reference to Action Plan and to Behavioural Change – see also comment on Q20

**Q15 Waste/recycling** – no added comment

**Q 6 & 17 Adequacy of consultation in advance of Bill and views on SEA consultation**  
the effort to consult was commendable but the nature of the topic and the background information available early in 2008 made it difficult to provide meaningful comment and clear conclusions on the broad options considered as part of the SEA. It is worth noting that the broad brush SEA evaluation of options did consider that both the economy and the environment would gain from faster and sustained cuts in greenhouse gas emissions, a conclusion strengthened in the First Report of the UK Committee on Climate Change.

**Q18 Equality Issues** These arise both in relation to individuals and to different parts of Scotland but can be handled as part of Budgetary and Mitigation Strategies – see also comment on Q20

**Q19 Impact of Bill on Sustainable Development** – this will depend on the Action Programmes and Monitoring adopted but Bill should reflect the UK Climate Change Committee view that progress on greenhouse gas reduction will make the economy stronger and more secure while also giving social gains and local as well as global environmental benefits

**Q20 Any other comments** - the main omission from the Bill is a requirement to indicate the proportion of greenhouse gas cuts likely to come from the action within the powers of the Scottish Government and action mainly dependent on UK, EU and international decisions. This should be made clear in the sections dealing with targets and percentage cuts.

Neither the Scottish nor UK Bills can set out detailed action programmes and related monitoring but the Scottish Bill should be modified to require the Scottish Government to produce rolling five-year action programmes and to indicate expectations of the outcome of UK, EU and international action. These programmes should include appropriate budgetary strategy and the treatment of adaptation, mitigation and equality issues. Review of such programmes should be the principal feature of the regular reports monitoring progress and recommending the further action required to meet, or modify, targets.

The Association sees significant opportunities for accelerating greenhouse gas cuts within the powers of the Scottish Government in relation to transport, planning and access. Scope for action in this area could be further enhanced through greater elements of fiscal, financial and energy devolution (see our submissions to the Calman Commission, the Strategic Transport Projects Review and the summary comments on the First Report of the UK Climate Change Committee and the two reports on Energy and Carbon Dioxide made by AEA to the Scottish Government in October, 2008 – all of these are sent as separate attachments)

Alastair Reid, Secretary,  
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