SUBMISSION FROM RSPB SCOTLAND

RSPB Scotland welcomes the opportunity to submit views to the EET Committee on the draft second Report on Proposals and Policies (RPP2). We are disappointed that the RPP2 does not provide the step change in ambition needed to meet all of Scotland’s climate change annual targets. RSPB Scotland calls on MSPs to ensure that the RPP2 package of measures is improved so that Scotland meets all of its future climate targets and that early action is taken to minimise impact on the natural environment. RSPB recommends that the draft RPP2 be improved by:

- Converting proposals into policies, and implementing them early;
- Ensuring the continued ambitious development of renewable energy, and supporting grid developments, are guided by a robust spatial planning framework that protects Scotland’s biodiversity (both onshore and offshore);
- Explicitly considering a scenario where Carbon Capture and Storage is not viable or developed as expected by 2020 and 2027, and its implications for hitting the proposed decarbonisation target

Introduction

RSPB Scotland is supported by nearly 90,000 members from both urban and rural areas, campaigning on issues affecting wildlife and the natural environment. We have cross-cutting expertise and experience of spatial planning, marine and sustainability issues within Scotland, the UK and internationally through our partnership with Birdlife International.

The RSPB is unusual amongst NGOs because we engage with individual applications for renewable and other energy infrastructure, advising developers on how they can avoid and minimise negative impacts. Our staff are regularly involved with project proposals and comment on several hundred in Scotland each year. This gives us an almost unique perspective into the implications of new legislation and policy when working with Government. We are a member of Stop Climate Chaos Scotland and support their evidence to the committee on the RPP2.

We have focussed our response on renewable energy and reducing energy emissions. Bird populations reflect the health of the natural environment on which our future depends. Climate change is already affecting birds and wildlife in Scotland, and it threatens to drive future biodiversity loss unless urgent action is taken to reduce emissions. One study published in Nature indicates that climate change could commit up to 35% of species to extinction by 2050. A recent paper from the University of Exeter has shown that impacts on species attributable to climate change are following predicted effects, supporting the assertion that human-induced climate change is a major threat to global biodiversity.

General points on RPP2

- RSPB Scotland is disappointed that the RPP2 does not move Scotland further forward in a definitive plan to address greenhouse gases. We believe that the call for a ‘step change’ in effort advised by the UK CCC has not been heeded. RSPB
Scotland was disappointed when Scotland missed the 2010 annual target for GHG reduction. We believe that to avoid missed targets in future the RPP2 must set firm policies that provide abatement above target levels, to provide significant levels of contingency. We do not believe the draft RPP2 does this as there is a heavy reliance on unconfirmed proposals.

- RSPB Scotland is very concerned that without concerted effort to develop and implement the full range of proposals, along with the policies, Scotland will be unable to meet all of its annual targets. Annex 2 of the RPP2 shows this clearly. RSPB Scotland recommends that RPP2 proposals are turned into policies at the earliest opportunity in order that Scotland’s people can be assured that we will meet all our annual GHG reduction targets.

- RSPB Scotland believes that early action to cut emissions is vital (especially for our natural environment) and is also cheaper than later spending. However, much of the RPP2 carbon abatement effort is planned for post 2020. We cannot afford to wait until the 2020s to start taking significant action and therefore we recommend that proposals are brought forward to earlier years.

Renewable energy

Good progress has been made in renewable electricity development. Since RPP1 the target of delivering at least 80% gross electricity from renewables by 2020 has been raised to 100%. Research commissioned by RSPB Scotland, WWF Scotland and Friends of the Earth Scotland showed it is possible to meet or even exceed this target without harming important environmental interests. RSPB Scotland fully supports the development of well-sited renewables. The real challenge lies not in meeting the targets, but in doing so in harmony with our natural environment. We are concerned about a number of inappropriate wind farm proposals which have come forward in recent years, most notably the proposed Lewis wind farm which was commendably refused by Scottish Ministers in 2008. Information available on site sensitivity has not proven sufficient to deter some developers from proposing development in sensitive areas.

As we move closer towards achieving the 2020 target, the pressure on Scotland’s most important habitats is likely to increase, and the ambition expressed in RPP2 confirms this. Whilst the ambition to increase renewables capacity is welcome, this must go hand in hand with a robust approach to protecting vulnerable sites. Scotland’s ecologically sensitive regions must be identified and an assessment made of the level of investment in renewable energy that can be made without negative ecological impacts. This assessment must be accompanied by spatial guidance for developers and planning authorities. For onshore development, this spatial guidance could be informed by including Scottish Natural Heritage’s Strategic Locational Guidance for Onshore Windfarms in NPF3.

The significant anticipated increase in marine renewables, in particular offshore wind, is a potential cause for concern given the lack of available data on sensitive sites. We urge the Committee to call for more research into, and better monitoring of, the impacts of marine renewables on ecosystems. RSPB recently conducted a review into the impacts of such devices on birds, but much more needs to be done to improve our understanding and aid the sustainable development of marine
renewables. A National Marine Plan led system supported by an ecologically coherent network of Marine Protected Areas, and based upon a robust empirical evidence base, is the most effective mechanism for achieving a sustainable offshore renewables industry.

Regarding bioenergy, we are concerned that the results of the Renewables Obligation banding review, announced on February 12th, are not consistent with the RPP2. The RPP2 states that “biomass should be used in the most efficient and beneficial applications at a scale that is appropriate to make the best use of finite bioenergy supplies i.e. in heat only or Combined Heat and Power (CHP) applications and off gas-grid solutions”. The decision to incentivise electricity-only biomass plants of up to 15MW capacity via Renewable Obligation Certificates, paves the way for new large-scale and potentially destructive biomass plants that risk negatively impacting domestic wood supply and driving deforestation abroad.

Reducing energy demand and emissions

We strongly welcome the new decarbonisation target to achieve 50gCO2/KWh by 2030, furthering the RPP1 commitment to ‘largely decarbonise’ Scotland’s electricity supply. We are concerned however that the energy mix proposed (p.75), which is based on significant gas plant back-up, risks locking Scotland into unabated high carbon generation. Whilst the report recognises that Carbon Capture and Storage (CCS) will not be viable in the first instance, it is assumed that CCS will be operational by 2020 and capacity tripled by 2027.

We propose that caution should be exercised here, given the failure of the first UK CCS Competition despite high hopes for CCS in RPP1. Should CCS not prove to be viable by 2020, there may be unabated power stations on the grid for decades to come. The RPP2 would be strengthened by considering a ‘CCS-not-feasible’ scenario, not assume CCS as a given (e.g. paras 4.4.4 and 4.7.1).

Whilst good progress has been made with the energy demand target of 12% reduction by 2020, we do not believe that the target of 12% is ambitious enough. The target should be increased alongside a strengthening of effort to tackle energy efficiency and galvanise behavioural change. We support the recognition that energy efficiency is the “simplest and most cost-effective way to reduce emissions”.

We welcome the aim to transition the skills and infrastructure from the oil and gas industries into a low carbon economy. However, we are concerned that Scottish Government policies for economic growth are heavily dependent on continued oil and gas extraction and export. We urge the Committee to consider the RPP2 together with, not in isolation to, those economic targets and policies, and consider their compatibility with the targets and underlying aims of the RPP2 and Scotland’s climate change targets.

Grid upgrades and transmission charges

We support necessary upgrades and reinforcements to the grid in Scotland to accommodate renewable generation sources. This must be carried out sensitively, with stakeholders such as RSPB Scotland consulted in the early stages of planned grid development in order to avoid conflict with sensitive environmental interests. We
also broadly welcome recent reviews to transmission charging where they aim to facilitate a move to a low carbon energy sector. However, where changes to transmission charging are likely to make development more attractive it is imperative that precautions are in place to ensure important places for wildlife are protected.

RSPB Scotland
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