Written evidence from RSPB Scotland

RSPB Scotland welcomes the opportunity to submit views to the RACCE Committee on the draft second Report on Proposals and Policies (RPP2). Peatland restoration is a welcome inclusion in RPP2 as a policy. We will work with Government and partners to help achieve the proposed target and ensure peatland restoration benefits the climate and biodiversity.

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 RPP2 be improved by:

- Converting proposals into policies, and implementing them early;
- Fully committing to achieving a minimum of 21,000ha of peatland restoration per year;
- Introducing a clear route map to introduction of nitrogen efficiency measures by all farmers, including a date and regulatory trigger;
- Providing clarity regarding proposals and their estimated abatement which are scheduled for implementation post 2020 in the rural land use sector – especially technical potential from low-carbon land use;
- Protecting marine environments and including a policy to restore marine carbon sinks.

RSPB Scotland and climate change

The RSPB in Scotland is supported by nearly 90,000 members from both urban and rural areas, campaigning on issues affecting wildlife and the natural environment. In combination with RSPB staff across the UK, and our international partners in Birdlife International, we have cross-cutting expertise and experience of spatial planning, marine and sustainability issues within Scotland, the UK and internationally. The RSPB is unusual amongst UK NGOs because we engage with individual applications for renewable and other energy infrastructure across the UK, advising developers how they can minimise the impact of their developments, as well as working with Government to develop legislation and policy. Our professional planning and conservation staff are regularly involved with individual project proposals and we comment on several hundred individual proposals in Scotland each year. This gives us an almost unique perspective into the implications of new policy for development on the ground.

Bird populations reflect the health of the natural environment on which our future depends. Climate change is already affecting birds and wildlife in Scotland, the rest of the UK and globally, and it threatens to drive future biodiversity loss unless urgent action is taken to reduce emissions and keep the world within ‘safe’ levels of climate change. One study published in Nature indicates that climate change could cause
up to 35% of species to be committed to extinction by 2050\textsuperscript{1}, and a recent paper from the Centre for Ecology and Conservation at The University of Exeter has shown that the documented impacts on species attributable to climate change are following the predicted effects, supporting the assertion that human-induced climate change is a major threat to global biodiversity\textsuperscript{2}.

RSPB Scotland welcomes the opportunity to submit views to the RACCE Committee on the draft second Report on Proposals and Policies (RPP2). We are a member of Stop Climate Chaos Scotland and Scottish Environment LINK. We support both organisation's evidence to the committee on the RPP2.

**General points on RPP2**

- RSPB Scotland is disappointed that the RPP2 and also its Rural Land Use section do not move Scotland further forward in a definitive plan to address greenhouse gases (GHGs). We believe that the call for a ‘step change’ in effort advised by the UK Committee on Climate Change has not been heeded. RSPB Scotland was disappointed when Scotland missed the 2010 annual target for GHG reduction. We believe that to avoid further missed targets in the future the RPP2 must aim to set firm policies which provide abatement above the annual target level, in order to provide significant level of contingency. We do not believe that the draft RPP2 does this because there is too great a reliance on uncertain and 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.**

- Abatement comparison between RPP1 and RPP2 Rural Land Use policies shows that ambition has actually decreased. Abatement ambition from proposals shows a small increase. Ambition is seen, however, in estimated abatement between 2020 and 2027 but, **we believe, more transparency is needed regarding the estimates for many of the Rural Land Use proposals which are included in this period.**

- 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 years post 2020. This can be observed clearly in the Rural Land Use sector. 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.**

\textsuperscript{1}Thomas et al. (2004) Extinction risk from climate change Nature 427 pp.145-148
\textsuperscript{2}Ilya M. D. Maclean1 and Robert J. Wilson (2011) Recent ecological responses to climate change support predictions of high extinction risk Proceedings of the National Academy of Sciences of the United Stated of America
Progress of RPP1 policies and proposals

- **Peatland restoration** – RSPB Scotland welcomes the work done to take peatland restoration from a ‘Supporting and enabling measure’ in RPP1 to a policy in RPP2. The new policy in RPP2 restates an existing commitment to spend £1.7m on restoration. We also recognise that considerable effort has been made to restore peatlands by land managers. RSPB Scotland has been active in peatland restoration. For example at our Forsinard Flows nature reserve in Caithness and Sutherland we have remove conifers from 2,200 ha of former blanket bog and have blocked ditches on 15,600 ha. Research has also been done in Scotland to better quantify the carbon benefits of peatland restoration – some of the ongoing research is located at Forsinard.

- **Farming For a Better Climate** – Since the 1990 baseline, the agriculture industry has cut GHG emissions, mostly due to declining livestock numbers and reduced us of nitrogen fertilisers. We recognise that FFBC is working with farmers to disseminate messages on reducing GHG emissions from agricultural practices. However, because FFBC is not adequately monitored, both in terms of measure uptake or coverage across Scotland we are concerned with the validity of the estimated abatement from this policy.

- **Forestry** – Tree planting rates are now nearing the 10,000ha per year target and agreement has been reached for this target to 2022.

- RPP1 included a proposal for **mandatory climate measures through the Common Agriculture Policy (CAP)** but this has also been deleted from RPP2. We recommend that this proposal is reinstated into RPP2 and developed to ensure that all farmers receiving CAP subsidy is required to adopt climate beneficial measures.

RPP2 policies and proposals

Rural Land Use

The Rural Land Use sector is the sector most closely linked to Scotland’s natural environment and is most significant to the work of RSPB Scotland. We believe that RPP2 lacks abatement ambition from policies in the land use sector – the abatement from policies was greater in RPP1. Furthermore, too many of the policies and proposals rely on voluntary uptake – particularly in agriculture. Voluntary measures mean that achieving estimated abatement is not fully in Government control to achieve and therefore the RPP2’s credibility suffers.

- **Peatland restoration** is a welcome inclusion in RPP2 as a ‘policy’, although this is a restatement of an existing commitment of £1.7m for restoration. A new RPP2 proposal suggests that a target of 21,000ha/yr of peatland restoration is ‘technically feasible’. Unfortunately, the wording does not formalise a target and allows room to do less. RSPB Scotland recommends that the peatland

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5 para 9.4.5 of RPP2
restoration target is formalised with a firm commitment to restore a minimum of 21,000ha/yr of peatland (blanket bog & lowland raised bog), and a commitment to finding funding. Realising this target could result in 362,000ha of restored peatland and annual abatement of 0.5Mt CO2e. RSPB Scotland and partners have called for 600,000ha of Scotland’s blanket bog under restoration management within 10 years which, based on ClimateXchange estimates could realise a saving of between 1 and 2.7 Mt CO2e yr\(^{-1}\).

We believe that there is scope to go beyond the 21,000ha figure for restoration by building on the partnership working and coordination already underway in Scotland. Local authorities, Forestry Commission, Scottish Water, Scottish Natural Heritage must come together to commit to realising this target and work with Scotland’s Moorland Forum, Peatland Working Group, IUCN UK Peatland Programme, Scotland’s 2020 Climate Group and many other NGOs and organisations to restore degraded peatlands. Through coordination, Scotland can lead the way in seeing climate change mitigation and adaptation, water quality and biodiversity benefits from peatland restoration.

- **90% Nitrogen Efficiency Measures** is a new proposal which introduces the threat of new regulation to boost uptake of these measures to 90% of farmers. We welcome this but believe that a regulatory trigger must be agreed and publicised in order to stir farmers into action if they wish to avoid regulation, as without this the threat of regulation is weakened. **RSPB Scotland recommends that a date and a regulatory trigger is clarified in the RPP2.**

- The proposals for developments in **agricultural technology**, and **technical potential from low-carbon land use** indicate large abatement levels by 2027. However, these proposals and the abatement estimated are very opaque and lack credibility at this stage. Greater work is needed to develop these proposals and confirm the estimated abatement, or alternative policies are required to fill the abatement gap.

**Marine**

Policies in the marine sector do not feature greatly in RPP2. However, RSPB Scotland believes that the marine environment can support the drive to cut Scotland’s emissions on the condition that it is treated sustainably and sensitively.

- **Marine renewable** - Far from acting as a hindrance, we believe that more comprehensive protected area networks at sea, and true marine spatial planning, will assist the development of the marine renewable energy industry by identifying environmentally sensitive areas to avoid. **RSPB Scotland recommends that the RPP2 is explicit in the means by which sensitive marine areas will be protected from marine development – particularly, in the context of RPP2, marine energy (oil & gas, and renewables).**

**Marine carbon sinks** – RSPB Scotland believes that RPP2 offers an appropriate opportunity to recognise the potential for Scotland’s marine carbon sinks\(^7\),\(^8\), to lock

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\(^7\) Sometime termed 'blue carbon'.

\(^8\) ClimateXchange, Current status and knowledge about potential sequestration capacity for ‘blue carbon’ sinks in Scotland.
up and sequester carbon within marine habitats. We believe that kelp beds and seagrass beds in Scottish waters, which are not currently protected by legislation, should be protected from disturbance. We also recommend a programme to recreate saltmarsh habitats through a process of managed coastal realignment. Suitable locations along our coasts and firths should be identified and prioritised for managed realignment. This process should include areas where saltmarsh can protect homes and businesses against coastal flooding. **RSPB Scotland recommends that marine carbon sink protection and enhancement is included as a policy in RPP2.**