Written Submission from SCIAF

Introduction

The Scottish Catholic International Aid Fund (SCIAF) is the official overseas aid and development charity of the Catholic Church in Scotland. SCIAF runs projects in 15 countries in Africa, Latin America and Asia, helping thousands of people of all faiths and none to overcome hunger, poverty, war and natural disasters every year. In Scotland we campaign to tackle the root causes of global poverty. Our vision is a world in which all people, especially the poor and the oppressed, can live life to the full.

Climate change is already pushing many of the people SCIAF works with into poverty and time is running out to keep global warming below the dangerous tipping point of 1.5 degrees above pre-industrial levels. We campaign to ensure that Scotland fulfils its common but differentiated responsibility to reduce greenhouse gas emissions and to tackle the irreversible impacts of global warming. In January 2017, SCIAF launched a campaign calling for a transition away from fossil fuels to clean energy in Scotland and support for sustainable energy access in developing countries. Our campaign draws on the experiences of the people we serve overseas, as well as the moral leadership of the Catholic Church in the movement for climate justice.

SCIAF welcomes the cross-party support for climate justice in the Scottish Parliament, and commends the Scottish Government’s ambitious vision for a low-carbon economy and a transition away from fossil fuels. This vision comes across strongly in the draft Climate Change Plan (CCP) and Energy strategy, and forms a good basis to build on. We believe, however, that more ambitious and rigorous policies and proposals could improve the draft CCP, and would help to ensure that the low-carbon transition proceeds without delay.

SCIAF an active member of the Stop Climate Chaos Scotland (SCCS) coalition, and supports the evidence that the coalition will submit to the Environment, Climate Change and Land Reform.

In summary, SCIAF’s view of the draft Climate Change Plan is:

1. SCIAF welcomes the plan, and notes the ambitious vision it puts forward for a low-carbon future in Scotland.

2. SCIAF believes that the Climate Change Plan would benefit from more detail on how this ambition will be achieved.

3. SCIAF notes with concern that few new policies have been introduced in the plan, and that projected emission reductions in some sectors rely on projected technological and market-led developments. Considering the urgent need to reduce emissions, SCIAF calls for the Scottish Government to include new policies based on available technologies.
This submission will begin by offering general recommendations on the ambition and detail set out in the CCP, and it will conclude with sector-specific recommendations for the draft CCP.

**General recommendations**

**TIMES model and climate governance**

We welcome the introduction of the TIMES model; we believe it has allowed for a more systematic approach to identifying emissions reduction pathways. However, the new model also means that readers of the CCP need to rely on policy detail to assess the feasibility of the plan. At the moment, this detail is lacking in many areas of the plan.

SCIAF also welcomes the monitoring and evaluation framework provided in the plan. However, this framework may be difficult to implement unless more detail on the policies in the plan is provided.

Ambition proposed for some sectors is higher than expected, but the pathway to this ambition is not clear.

For example, the CCP proposes that 80% of homes and 94% of non-domestic buildings will be heated by renewables by 2030. The plan anticipates no significant changes in the next decade, but expects a major increase in renewable heat deployment from mid-2020s. SCIAF welcomes this ambition, but is concerned over how it will be delivered, as the plan contains no new policies to drive mass roll-out of renewable heat.

Furthermore, although the CCP envisions an increase in uptake of energy efficiency measures, it is not clear how this increase will be supported. The plan contains no significant new funding for energy efficiency measures or plans on how private finance will be leveraged to this end.

Ambition, policies and proposals on some key sectors are weaker than expected, and weaker than what is needed.

The CCP proposals on transport and agriculture in particular are surprisingly unambitious. For example, the UKCCC anticipates that 65% of new vehicle sales will be ultra-low emission vehicles (ULEVs) by 2030 while the CCP only sets this figure at 27%. Furthermore, annual emissions reductions from the transport sector are due to be less than the required 3% per year set out in the Climate Change Act. The UKCCC has clearly indicated that in order for the Scottish Government to achieve its climate targets, it must implement new policies to cut emissions in sectors such as transport, agriculture and land use, as well as renewable heat uptake.

Policies proposed for some sectors rely heavily on technological developments that are beyond the control of the Scottish Government.

For example, projected emissions reductions in the transport sector are based on market-led technological solutions. In addition, the CCP’s pathway to negative emissions from electricity generation relies on Carbon Capture and Storage (CCS) technology becoming available, even though the technology has not yet been
deployed at industrial scale in the UK. SCIAF believes that developments both in market-led vehicle efficiency and CCS are to be welcomed. However, considering the urgent need to reduce emissions, we would encourage the Scottish Government to ensure that such projections do not detract from policies that can deliver emission reduction in the immediate future.

In order to address these concerns, SCIAF recommends that:

1. Every policy in the Climate Change Plan has sufficient detail to allow readers to assess to what extent each policy contributes to meeting Scotland’s climate targets or provides additional benefits.

2. The draft plan should be amended so that each policy outcome is measurable with clear expectations on outputs, milestones and outcomes.

3. The Plan should introduce new policies, particularly in sectors which have underperformed previously, such as transport.

**Sector-specific recommendations**

**Transport**

A transition away from fossil fuel-powered vehicles is key to reducing Scotland’s emissions. Over a quarter (28%) of all Scotland’s emissions come from transport yet emissions have fallen just 2% since 1990.

Many countries in Europe, such as Norway, are planning ambitious policies to phase out of cars that run on fossil fuels, and are investing in active travel, like walking and cycling. The new Climate Change Plan is an opportunity to start working towards a transport system that runs on clean energy and fits the needs of Scottish people. However, the draft plan relies on market-led technological change for much of the planned emissions reductions in this sector and on actions by the UK Government or EU to deliver the policy outcomes, which are expected to deliver the biggest emissions reductions. As mentioned above, the target for ULEV market penetration falls short of the UKCCC projection.

In addition, the Plan builds in expectations of significant increases in transport demand. SCIAF believes that the Plan could benefit from putting more emphasis on reducing demand, for example by ensuring that affordable public transport is readily available. The draft Plan should include more ambitious policies to reduce the amount of polluting petrol and diesel cars in Scotland, and to encourage active travel and use of public transport. These policies could include Workplace Parking Levies and Low Emission Zones, which are currently referenced in the draft CCP as proposals.

In order to address these concerns, SCIAF recommends:

1. Ensuring Air Passenger Duty (APD) remains at its current level to cut emissions, improve air quality & promote behaviour change

2. Embedding Low Emission Zones and workplace parking levies as policies, rather than as proposals
3. Introducing a more ambitious target for market penetration of ULEVs in line with UKCCC recommendations

**Energy efficiency**

Scotland has made good progress in energy conservation, but we know that much more can be done in the residential sector. The CCP suggests that energy efficiency measures will double from 2017 to 2018, but there is no detail as to how this will be achieved and no further increase envisaged between 2018 and 2032. Much of the success of the plan relies on the new Scottish Energy Efficiency Programme (SEEP) which is currently being consulted on. Furthermore, despite previous plans to introduce energy efficiency regulations for all privately owned homes, the draft CCP opts to only consult on standards for private rented sector homes.

As a member of SCCS, SCIAF urges the Scottish Government to ensure that all homes reach at least an EPC band ‘C’ by 2025. The roll out of the new Scottish Energy Efficiency Plan must set clear objectives, start earlier and be properly funded to deliver the transformational change which Scotland’s homes and buildings require.

In order to address these concerns, SCIAF recommends:

1. Committing to making all Scottish Homes at least EPC C rating by 2025. In order to achieve this, clear objectives and a plan for implementation for the Scotland’s Energy Efficiency Programme (SEEP) should be set.
2. Extending energy efficiency regulation to all private homes.
3. Increasing the 2017/2018 budget allocated for energy efficiency measures, and committing to increased funding throughout the period covered by the CCP.

**Heat**

The UKCCC has identified renewable heat deployment as a key challenge for Scotland’s action on climate. The last Report on Proposals and Policies proposed that this Plan would include new policies to support the increased deployment of renewable heat. The high level of ambition on heat contained in the new draft Plan is welcome. However, SCIAF notes with concern that there is little detailed policy in the draft Plan which would realise that ambition.

In order to address these concerns, SCIAF recommends:

1. Establishing a clear, credible path with detailed policies and milestones for achieving the ambitions on heat, particularly post 2025. This should include an earlier start in the shift to low carbon heat, building on existing successes in heat pumps and district heating, and growing these businesses.
2. Including new policies that will support the scale of transformation in heating envisaged, such as the use of building regulations and changes to planning, minimum standards, finance and the regulation of district heating.
Conclusion

SCIAF welcomes the draft Climate Change Plan and the opportunity to contribute to it. Due to the imminent threat climate change poses to our societies and especially to our poorest brothers and sisters overseas, SCIAF urges decision-makers to ensure that the Climate Change Plan is as ambitious and rigorous as possible, and starts to deliver emission reductions in the immediate future.

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