Dear Lord Deben,

Evidence to the Environment, Climate Change and Land Reform Committee on the Climate Change (Emissions Reduction Targets) (Scotland) Bill

I am writing to thank you for giving evidence to the Environment, Climate Change and Land Reform Committee last week on the Climate Change (Emissions Reduction Targets) (Scotland) Bill, as well as the Scottish Government’s final Climate Change Plan and your Progress Report for Scotland 2018. The Committee appreciates you taking the time to give evidence and assisting us in our deliberations on this important Bill.

The Committee had a number of questions which it did not have the opportunity or time to ask at the meeting last week. I would be most grateful if you could provide a written response to the following queries:

Final Climate Change Plan

- Given that updated emissions envelopes for LULUCF have allowed for reduced ambition across other sectors, what should be done to ensure that achieving future targets are not overly reliant on these sinks?

- How does the CCC model future emissions reduction scenarios, does it have access to the TIMES Model yet?

- The CCC calls for “clarification of non-domestic policy” in relation to energy efficiency in buildings. What discussions have you had with the Scottish Government in relation to this, and are you satisfied that policies in this area will fit with your scenarios?
• Both this Committee and the CCC were critical of the lack of progress on transport in the draft CCP. The Report welcomes progress on ULEVs, however makes little mention of active travel or public transport. Is enough being done in these areas?
  o Is it riskier to focus on technological solutions and emissions intensity\(^1\) rather than reducing distances travelled, or modal shift?

• Why is there such a significant difference in the assumed growth profiles of ULEVs between CCC and Scottish Government scenarios?
  o How do these scenarios translate to cumulative sales as a percentage of total sales?

• Is enough being done to support the haulage industry and those reliant on heavy diesel to reduce emissions?

• Given that there is little progress in relation to agricultural emissions, what impact will this have on the CCP’s scenarios and the 90% ambition in the Bill?

• The CCP proposes to set an annual percentage target for the emissions intensity of the beef, sheep and dairy sectors. This will require farmers to undertake genotyping, improve fertility, reduce animal mortality and to improve management practices, as well as to reduce emissions from nitrogen fertiliser. Which of these is a priority for action, and what are the barriers?

2018 Progress Report

• Whether adequate data now exists to effectively estimate emissions from agriculture?
  o Have recent improvements to methodologies (through the creation of a SMART Inventory) improved understanding of abatement potential within the sector?

• The Progress Report has highlighted a number of policy requirements in order to meet the aspirations of the CCP, and emissions reduction targets out to 2050 (e.g. the development of an energy efficiency strategy for non-domestic buildings). How urgent are these policy requirements and will a new CCP be required sooner rather than later?

• Both this Committee and the CCC have highlighted the need for contingency planning should untested technology not be deployed, or LULUCF sink estimates be modified. What contingency planning, in your view, has the Scottish Government been undertaking and how effective will this be? How important is this, as targets are expected to become more challenging?

\(^1\) Emissions per km travelled
Advice on the Scottish Government’s Climate Change (Emissions Reduction Targets) (Scotland) Bill

Advice on the Bill

- Could you please provide an outline of the process of compiling the evidence on which the advice to Ministers is based?

Sections 1 & 2 – The Net Zero and 90% by 2050 Targets

- What are the benefits and risks of each of the two options in your advice, and of going beyond 90%?

- The CCC has stated that emissions reductions are “at the limits of feasibility identified to date”, and at the “very limit of feasibility” – how is feasible defined?

Section 3 – Interim Targets

- If Scotland is on course to outperform the interim 56% target for 2020, could this be made more challenging to front-load the emissions reduction pathway?

Section 4 – Modification of the 2050 and Interim Targets

- What scenarios might require changes to the interim targets, and what are the practical implications?

- Why is the ability to lower as well as raise targets “critical to the operation of the target framework proposed by the CCC”?

Section 5 – The Target Setting Criteria

- Whether the CCC had any input on choosing the target setting criteria?

- Given that they were originally set out in the 2009 Act, are they still appropriate for this Bill?

- Would it be better if they more closely aligned with the Climate Change Plan’s sectoral approach?

Section 6 – Duty to Seek Advice from the Relevant Body

- Under what circumstances would the CCC envisage recommending the purchase of carbon credits to meet targets?

Section 9 – Annual Targets: 2021 to 2049

- Why it is preferable to express targets in percentages, rather than in tonnes of emissions and what are the advantages and disadvantages of both approaches?

Part 2 – Emissions Accounting
• Why should a “back-up option” in case of “unexpected, sustained underperformance against annual targets” be allowed?

• Could the use carbon credits become a bargaining tool (e.g. to stop carbon leakage) from industry/manufacturing rather than to improve environmental performance?

• For a clear explanation of how inventory revisions can make targets easier or harder to meet, and how the proposed changes will help to ensure objectivity, consistency and transparency?

• Whether the 5 year approach is likely to result in “dips” or “sprints” of activity between years 5 and 1?

Once again, on behalf of the Committee, I thank you for your time and your evidence, which will be most valuable to us in our deliberations on the Bill.

Yours sincerely,

Gillian Martin MSP
Convener
Environment, Climate Change and Land Reform Committee