

**Environment, Climate Change and Land Reform Committee**

**Climate Change (Emissions Reduction Targets) (Scotland) Bill**

**SUBMISSION FROM Cycling Scotland**

Cycling Scotland welcomes the opportunity to contribute to the Committee's call for evidence. Our key points are:

- The role of cycling and active travel should be recognised as zero-carbon option to help deliver the current targets and the aspiration for a net-zero emissions future.
- Although technology has a role to play, it should not be relied upon too heavily to achieve emission reduction targets.
- Reporting of targets should be in percentages, and annual targets should align with interim and long-term targets to ensure consistency.
- Climate Change Plans should be consistently published and clearly outline actions to reduce emissions and improve air quality, including a focus on cycling (and active travel).
- Cycling Scotland offers to use the Cycling Potential Tool to model emissions savings for a defined/specified area from realising the cycling potential.

Cycling Scotland is the nation's cycling organisation. Working with others, we help create and deliver opportunities and an environment so anyone anywhere in Scotland can cycle easily and safely. Our vision is for a sustainable, inclusive and healthy Scotland where anyone anywhere can enjoy all of the benefits of cycling.

**Provisions to set a Net Zero Emissions target in the future and increasing the 2050 target to 90% reduction from the baseline**

We welcome the ambition in the Bill to work towards net-zero emissions. To help achieve this, greater emphasis on cycling and active travel is needed, as zero-carbon options. Targets should be accompanied by policies and initiatives that will help achieve the targets such as the promotion of cycling and active travel, and behaviour change to facilitate modal shift.

The latest figures show that emissions from transport are increasing, with transport now accounting for more than 37% of total greenhouse gas emissions in Scotland. This represents a 7% increase from the 1990 baseline<sup>1</sup>. Road transport specifically is the largest source of emissions in Scotland. Using bikes to replace short car journeys and for city trips gives the greatest savings in emissions. Stop-start driving and short-trips (where the engine does not have time to warm up properly) results in more fuel being burnt less efficiently and thus a higher level of emissions. In Scotland, the latest available figures show that 61.4% of car journeys are less than 5 km<sup>2</sup> <sup>3</sup>, offering a real opportunity to switch to cycling, and have a significant impact on reducing transport's contribution to carbon and other greenhouse gas emissions.

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<sup>1</sup> Scottish Government (2018) Scottish Greenhouse Gas Emissions 2016

<http://www.gov.scot/Resource/0053/00536542.pdf>

<sup>2</sup> Transport Scotland (2017) Travel and Transport in Scotland 2016, page 49

<https://www.transport.gov.scot/media/39692/sct09170037961.pdf>

<sup>3</sup> Car journey includes both driver car and passenger car journeys

To achieve the emissions reduction required to meet these targets, and work towards net-zero, the transport sector should not rely too heavily on fuel efficiency and technology improvements, which cannot be guaranteed and may not deliver the pace of change required. Indeed, electric and other low emission vehicles still contribute to particulate matter emissions, through braking and tyres, which arise almost exclusively from vehicles. This has implications with regards to the focus on decarbonising cars and electric vehicles to reduce emissions, as they still represent traffic and such issues would remain even with these vehicles generating less exhaust emissions.

As a minimum, the target for 2050 should be 90% reduction, with incremental increases towards this, as outlined in the Bill. As the Scottish Government met its 2020 target to reduce emissions by 42% six years early, this provides an opportunity to set more ambitious targets, and demonstrates that targets can be met.

### **Annual targets: 2021 to 2049 (moving to expression in percentages)**

As outlined in our response to the Scottish Government's consultation on the Climate Change Bill, we welcome the decision to move the expression of annual targets to percentages. Percentage reductions are easier for everyone concerned to understand, and arguably more so by members of the public, who are crucial to get on board, if targets are to be achieved and be more intuitive, as their travel behaviours will have a significant impact on emissions from transport. Percentages can also be more easily tracked from one year to the next, and are easier to monitor if on track to meeting the targets. Further, it will help improve consistency of monitoring and measuring targets longer-term.

Further, annual targets should reflect and be a step towards achieving interim and long-term targets, and so should be set as a direct consequence of these. Targets set on the basis of actual emissions are more accurate and more realistic, and can be used to measure if targets are achievable.

### **Publication of targets**

Targets should to be published consistently, so progress towards them can be measured and tracked over time. With regards to this, progress towards targets should be published annually, as this helps improve accountability and also further assists with tracking and monitoring.

Reporting of greenhouse gas emissions reductions should include details on all types of greenhouse gases by sector and align with the sectors outlined in Section 2 (C) E of the Bill, and also by greenhouse gas type, to track areas of action required such as transport.

### **Climate Change Plans**

In our response to the Scottish Government's consultation on the Climate Change Bill, we agreed with the proposals that the current frequency of 5 years for Climate Change Plans is appropriate as this provides enough time for evidence and actual progress towards targets to be identified and measured, and properly reported. Each plan should be focused on the time period it covers. However, there should be an annual publication of key targets and progress towards them, to accompany the Plan(s), through annual progress reports for example.

Regarding the number of days given to Parliament to review and approve Plans, in the aforementioned consultation, we agreed with the recommendation that the period of time

for Parliamentary scrutiny should be 120 days. As this is not proposed in the current Bill, we welcome reference to 90 days in the Bill and believe this should be set as a minimum number of days required.

**Other**

Cycling Scotland operates a Cycling Potential Tool which can model emissions savings for a defined/specified area from realising the cycling potential. Going forward, we offer to use this Tool to help contribute to further evidence gathering and in any discussions on how the cycling potential tool can be incorporated more into decision making, strategic thinking, and monitoring around emissions reduction targets. We believe the Tool is of particular relevance to the Climate Change (Emissions Reduction Targets) (Scotland) Bill and ensuring that investment in cycling is prioritised where it will have the greatest impact, with regards to cutting emissions.