

Environment, Climate Change and Land Reform Committee

Climate Change (Emissions Reduction Targets) (Scotland) Bill

SUBMISSION FROM ABERDEEN CITY COUNCIL

Targets and scope of the Bill

Aberdeen City Council is supportive of the primary objective and the administrative requirements (seeking advice, ministerial duties, reporting and climate change plans) of the Bill, being to set greater emission reduction targets and for Scotland to continue to act as a World leader in tackling climate change. This legislation aligns with the principles of our own Local Outcome Improvement plan in having an Aberdeen that prospers, where people are resilient, included and supported when needed and we have empowered, resilient and sustainable communities. However, it should be noted that some officers would have liked to see the legislation go further to make a firmer commitment to net zero emissions and global leadership as a clear long-term marker from government for driving investment, innovation and change.

The inclusion of aviation and shipping in the setting of targets is welcomed, though there is a feeling that the Bill doesn't address the need for stronger Public Bodies Duties. It would be useful if the scope went beyond ambition and reporting at a national level and also strengthened the framework / expectations for leadership, accountability, target setting, action planning and reporting across other tiers of public sector and industry (i.e. major players / emitters). This might become more apparent through the Climate Change Plans and subsequent local level plans mentioned through the draft Energy Efficiency Strategy legislation.

As such, Aberdeen City Council welcome the provisions for modifications to set a net zero emissions target at a future point and the restrictions against offsetting, believing these targets and frequency of reporting are ambitious and are at the very limit of feasibility. It should be acknowledged that these will only be achievable if supported by strong policy measures, wider collaboration and potentially fiscal penalties/incentives to ensure transposition. However, Aberdeen City Council would urge caution in setting targets solely based upon the advice of the Committee on Climate Change. Their advice should be taken into consideration as part of a wider consultation with other groups to ensure holistic views are obtained.

Annual targets / reports would enable a clear path and trajectory but may not account for fluctuations such as unseasonably cold weather or economic dips which will affect emissions in any given year. It should be acknowledged that this may not give a clear picture.

In response to the question: Can target setting be considered without also considering what action will be required to meet them? It is felt that this should be no. Target setting should

always be done following robust analyses. That said, long-term targets can and perhaps should go beyond / be more ambitious than what is technically feasible today as situations change and it's important that ambitious leadership is shown.

While it's useful to see what criteria will be used to consider changes, it's not clear how useful this list is / will be in practice. Its wide ranging and difficult to deduce where the evidence will come from, what format it will take, etc. Overall, the wide scope risks giving too much room to allow for any scenario to be presented / justified. Would it not be more transparent / equivalent to say, 'Ministers will seek and take account of advice that must consider actual / potential impact (positive / negative) on all sectors of society'. Elements that are useful to see in here are those relating to 'Just Transition'. However, it may be more constructive to see these established more formally (i.e. through a 'Commission' as proposed by Friends of the Earth Scotland). This is pertinent for Aberdeen where a major part of the economic output of the region is currently anchored on oil and gas exploration / production and associated services. While Aberdeen is working hard to diversify the economy of the region and see a long-term shift to a low-carbon economy, it's critical to ensure the avoidance of shocks to the system as has already been experienced through the reduction in the price of oil. Ensuring a 'Just Transition' is one way to help protect from dramatic shifts that may have major impacts on local economies, jobs, inequalities, etc.

In respect to emissions accounting and the restriction on the use of carbon units, this is considered a step in the right direction towards ensuring strong domestic action to address Scottish emissions is the focus, and not offsetting emissions elsewhere. In an ideal world, this would not take place at all. There is also some disagreement over how emissions should be expressed. Some officers agree these should be expressed as percentages, as this is consistent and makes it more readily understood by the general public; however, others would prefer absolute emissions reporting alongside the percentages.

Challenges with implementation

It will be necessary for the Scottish Government to ensure consistent application and consideration of these targets, ensuring emissions reduction is embedded throughout all aspects of decision making and agreeing levels of priority in areas of policy conflict.

The impact and speed of change will be determined by:

- How quickly Scottish Government provide the first plan. Given they already have done a lot of work in this area, it would be pertinent for a position to be put forward on the plan almost immediately and no longer than 2 years.
- Research and innovation in alternative technologies, models of growth (especially in relation to consumption) and the speed at which these are applied. To be at the fore, it might be necessary for individuals and organisations to be slightly less risk averse and be proactive in trialling new approaches. This might need to be supported by Scottish Government in relation to financial and reputational risks.

- Who will fund the actions? Will there be duties on local authorities, developers /farmers /landowners etc? Para 68 states in the Policy Memorandum says: *As this is a framework Bill and does not set out how the targets will be delivered it is not possible to identify any direct effects on local authorities from the Bill proposals.* Clearly there will be a lot of local and regional delivery required.
- The continued levels of population growth, which means maintaining Business As Usual targets will be challenging in themselves.
- Considering emission production through whole life costing of products / projects; encouraging target compliance through all elements of the supply chain.
- Affordability of technology both at an individual and organisational level, with greater use of innovation and smarter technology to aid day to day operations, research and knowledge transfer.
- Effective communication and awareness, with easy understanding of what people can do and the interpretation of what net-zero emissions actually means. The use of Plain English will be essential, with simple infographics and stakeholder engagement with the diverse range of cultures being required to ensure understanding across all aspects of society.
- A need to provide additional support to those from disadvantaged backgrounds and those most vulnerable to the impacts of emissions.
- Ease with which people can participate to make change e.g. not having complicated application processes for grants, loans, funds etc.
- Embedding climate change and emissions reduction more strongly within the planning process, beyond existing building standards and supplementary guidance whilst ensuring its consideration within all aspects of locality decision making including education, transport, waste, energy, social care, health care etc. Will more detailed regulations follow on how these targets are to be implemented, and will other acts and regulations be amended to help deliver the targets?
- Having the resource available for undertaking emissions accounting, potential skills gaps / training needs in this area and the requirement for verification.
- If organisations and local authority areas aren't performing then there should be some recourse from this, either in the form of support to aid development or penalties for non-compliance or both. Presently performance monitoring is undertaken through Climate Change Reporting with limited individual feedback and no action taken in regard to positive or negative outcomes.
- Low carbon heat and transport are particular areas of concern where wide spread transformation presents particular challenges.
- How compatible these targets are with those of our present economy; there is still a heavy emphasis on fossil fuel sectors.
- There is a huge role for hydrogen to play in helping Scotland reach these targets, but this would require Government support and leadership to:
 - Increase hydrogen storage opportunities for renewable energy installations, current and future, so that renewable energy is not wasted when there are grid constraints but instead stored as hydrogen;

- Scale up hydrogen refuelling infrastructure throughout Scotland in general forecourts and subsidise hydrogen fuel costs to encourage private uptake of the vehicles as a complementary option to the investment already made in Electric Vehicles (EV). Hydrogen vehicles have a longer-term potential as their fuel cells don't rely on finite resources when compared to EV batteries such as lithium; and
- Invest in hydrogen from heat projects. Scotland could be a leader in this, as there is a huge opportunity to reduce emissions from heat (which are more than from transport). Current gas pipe networks have the potential to supply hydrogen and with only household appliance modification needed to achieve this.

However, it should be noted that hydrogen vehicles are substantially (more costly) heavier than their electric counterparts, causing an increase in particulate matter coming off the tyres which can have a significant impact on human health. Further hydrogen isn't presently produced using green energy.

Comments on the Financial Memorandum

- Given the timescales and the inherent uncertainty surrounding the potential cost implications of the Bill, the Financial Memorandum needs to recognise the risks that the cost estimates may prove to be significantly under (or over) stated.
- The Financial Memorandum outlines that the additional costs circa £13billion will be faced some years into the future, between 2030 and 2050. It does not outline which party the costs fall to / be met by due to the timescales and leaves that decision open to future governments. To any extent that those costs may fall to / be met in any proportion by Local Government, the Scottish Government should make clear it's commitment now to fully fund those costs in the settlement. Furthermore, it would surely enhance the quality of the discussion and decision making if there was some thought given as to how the current Scottish Government thinks the costs should be met, whether that be by the government, public sector or business, or what proportion by each. Whilst it would be open to the government of the day to change the approach it would give some guidance as to the current thinking and enable some forward planning to take place.
- The Financial Memorandum suggests that there will not be any costs to Local Government in the short term, with any future costs as outlined in the bullet point above not anticipated to be required before 2030. Costs could be faced by service practitioners in relation to resources and capital/revenue spend required to meet target implementation.

Other comments

- Should aim to better link adaptation and mitigation.

- Achieving these targets will require key actions including: policy change, investment, support and funding. With transport, buildings and industry highlighted as key sectors for emission reduction there will need to be a considerable work to overcome any shortfall between actions planned and the timeframe for wider mainstreaming, implementation and delivery. Similarly, much of the new and existing infrastructure will still be here in 2050 to meet targets and timeframes bolder steps will be required to meet the scale of transition necessary.
- Sectors need to clearly understand their role in the implementation of the bill. If the public sector is essential to the delivery of the bill - they will need stronger accountability and more teeth, funding and resources to deliver and implement change.
- The business sector will have to be engaged and encouraged to take action to support the delivery of this bill.
- Knowledge sharing on successfully implemented low carbon projects by early adopters will be essential for wider uptake.
- Costs, lack of options and inconsistency in support and information are barriers to consumer driven change. Need for a clear navigation process for people to find their way through the different options and funding sources ensuring there are opportunities for all, in support of the climate just agenda.
- The public also need to be engaged and encouraged to make their contribution / play their part. This is a collective responsibility and not something that any layer of government can really impose entirely – buy in from everyone to the real purpose of trying to reduce our emissions, with the capacity for everyone to contribute, will probably make for the best success.