

Environment, Climate Change and Land Reform Committee

Climate Change (Emissions Reduction Targets) (Scotland) Bill

SUBMISSION FROM ARGYLL AND BUTE COUNCIL

Argyll and Bute Council welcomes the opportunity to comment on the Climate Change (Emissions Reductions Targets) (Scotland) Bill.

It is acknowledged that the Bill increases the levels of Scotland's targets for reduction of greenhouse gas emissions from 80% by 2050 to 90%. In addition it creates the possibility of a target of 100% in the future and proposes new interim targets ahead of 2050 as well as updating accounting and reporting mechanisms on the targets. While this is broadly welcome, the Council is concerned that this consultation has been conducted on a similar timescale to the Energy Efficient Scotland Consultation: Making our homes and buildings warmer, greener and more efficient which has been based on the assumption that greenhouse gas emissions will be reduced by at least 80% by 2050. (Ref page 4, point 5 of the consultation). If as proposed within the Bill, targets are increased to at least 90% by 2050, this may have significant implications for the delivery of energy efficiency standards in the domestic and non-domestic sectors unless financial incentives are adjusted to account of the increased target. The existence of two targets within related consultations is confusing so this will have to be clarified when the Bill becomes law.

It is anticipated that local authorities will be expected to take the lead in encouraging delivery of the interim and final targets through the development of Local Heat and Energy Efficiency Strategies and related policies. They could certainly assist with this but it is anticipated that further staff and financial resources will be required to incentivise the necessary improvements across all sectors. Across both domestic and non-domestic sectors this may have to include the provision of compensation to encourage change in practice.

The presence of interim targets is welcome as they will help to encourage changes to behaviour and practice but the proposed tranche changes are steep and are unlikely to be achievable without tailored incentives and other forms of support. Their delivery is likely to be particularly challenging in rural and island communities where heating choices are limited and renewable measures costly to implement. Experience to date has also shown that supply chain restrictions add to the difficulty in delivering change to such areas in the absence of economies of scale.

The publication of targets and climate change plans may be helpful but only if full account is taken of the delivery context. In other words, it would be inappropriate to compare the performance of a geographically focused urban community with that of a rural and islands authority where the vast majority of settlements have populations of significantly under 2000. In the case of the latter, delivery is likely to be seriously affected by the previously mentioned supply chain limitations and lack of economies of scale.

In addition to the foregoing, the need for emissions accounting and reporting is recognised but this should be made as efficient as possible for reporting organisations. Ultimately, in setting targets, the Government should also fully consider the action that is necessary to achieve their delivery together with the widely varying resources available to organisations who will be expected to implement or enable the changes.

In conclusion, Argyll and Bute Council is grateful for the opportunity to comment on the Bill. It specifically wishes to highlight the challenges that will be faced by rural and island authorities in delivering the proposed targets. The associated change will have to be appropriately incentivised across all sectors to ensure delivery.