

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

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

**SUBMISSION FROM Citizens Advice Scotland**

1. Citizens Advice Scotland (CAS) seeks to improve outcomes for consumers. We use research and other evidence to put consumers at the heart of policy and regulation in the energy, post and water sectors in Scotland. We work with government, regulators and business to put consumers first, designing policy and practice around their needs and aspirations.

This submission pertains primarily to two points that the Committee is keen to hear views on:

- Can target setting be considered without also considering what action will be required to meet them?
- Challenges associated with implementation of the Bill

We argue that emission reduction targets in the residential and transport sectors will implicitly affect consumers in their every day lives, and as such, policies should not be set without first:

- i) undertaking behavioural change modelling to considering how consumers will be affected by targets – and further how different groups of consumers will be affected differently. As our recent research, outlined below concludes, factors such as socio-economic status, rurality, local authority area and tenure will have a bearing;
- ii) a routemap outlining exactly how consumers will be supported to lead lower carbon lifestyles, in terms of financial support and non-financial support like advice and education in order to reach targets. We argue that a large-scale public education campaign is required to this end.
- iii) understanding current consumer attitudes towards switching to energy-saving behaviour or personal investments like loft insulation or electric vehicles. It is essential that policy-makers undertake further research and behaviour change modelling to understand the scale of public awareness and investment required to make low-carbon lifestyles aspirational and indeed financially feasible for all consumer groups. Our policy recommendations are listed in pages 4-5.

**Summary of research and CAS's policy recommendations for the Climate Change Bill**

2. There is a growing recognition that the people of Scotland will have to adapt their lifestyles and make behavioural changes to help meet the decarbonisation targets proposed in the Climate Change Bill – in particular the target of a 23% decrease in emissions from

the residential sector by 2032<sup>1</sup> and the decarbonisation of transport. As such we wanted to further understand the implications of these evolving climate change policies on the people of Scotland.

3. In 2017 we commissioned Changeworks and Hilliam Research and Analysis to undertake a study to examine the detail of energy and climate change policy in Scotland. The primary research objective was to determine how the Climate Change Plan (Feb 2018), and Scotland’s first Energy Strategy (Dec 2017) and associated policies will potentially impact on consumers and to assess what steps are being taken by the Scottish Government and others to facilitate behaviour change. The [technical research report](#) and our policy insight report ‘[Changing behaviours in a changing climate](#)’ to which this submission refers is available online<sup>2</sup>.

4. Our research identified that programmes designed to facilitate one-off ‘structural’ behaviour changes such as installing retrofit energy efficiency measures, are well established in Scotland, and if well designed and implemented can succeed. However programmes to support habitual behaviour changes are less well established and targets for energy and water saving for example, are unspecified.

5. While the research team noted the difficulty in assessing the impacts that climate change policies will have on consumers, due to a lack of detail in current policies, it is clear that to meet ambitious climate change targets individual consumers will have to adapt. In many of the 7 key behaviours studied in detail in this research, there are positive outcomes for consumers over time with, for example, reduced bills and improved health and well-being.

6. However as identified in the research, a number of key behaviours rely on consumers making an upfront financial investment. This may act as a barrier to both consumers (despite the fact that they would benefit from the change) and to the Scottish Government in meeting its emission reduction targets.

The 7 key behaviours identified in research commissioned by CAS were:

<b>One off behaviour changes</b>	<b>Habitual behaviour changes</b>
Upgrading domestic heating	Adopt energy saving behaviours (heat)
Completing energy retrofits	Adopt energy saving behaviours (electric/water)
Install of smart meters	Purchase energy efficient equipment
Switch to electric vehicles or ultra-low	

<sup>1</sup> <https://www.gov.scot/Resource/0053/00532096.pdf>

<sup>2</sup> <https://www.cas.org.uk/publications/changing-behaviour-changing-climate>

emission vehicles ULEVs	
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7. As discussed in our stakeholder workshop<sup>3</sup>, it is risky for the Scottish Government to rely upon the assumption that individuals will spend their own money on the interventions noted above, at a time when inflation is rising above wage growth and household budgets are tight for many. In this circumstance the appropriate financial and non-financial support is needed to facilitate change – especially when those consumers who will feel the biggest impact are likely to have contributed the least to emissions. Support programmes should also consider factors such as: socio-economic status; local authority support; tenure; and rurality because people from different groups will require different approaches to help change their behaviour.

8. There is also a risk that the time and hassle factor for consumers who more commonly lead busier lives will be an additional barrier. As highlighted in our *Warming Scotland up to Energy Efficiency* research<sup>4</sup> a large scale campaign of public communications and engagement is needed to ensure that climate change targets and the behaviour change needed to meet them are aspirational for the people of Scotland as well as the Scottish Government. It is also important that any programmes that rely on consumer interaction are as simple and clear as possible.

9. Based on this research CAS make a number of **policy recommendations**:

**1) As the proposals and targets outlined in climate change plans and strategies will now need to be delivered, there is immediate need for the Scottish Government to put consumers' behaviour at the heart of policy.** Policy-makers should consider how targets are likely to impact consumers in real terms and design policies that support consumers to meet these. The ISM Tool<sup>5</sup> is a proven means to achieve this and develop appropriate solutions that consider the numerous factors that influence any behaviour or choice. However, this must be embraced across the Scottish Government so that policies are built around consumers and their behaviour, rather than behaviour being considered as an 'add-on'. Genuine commitment to supporting behaviour change is needed.

**2) The appropriate financial and non-financial support is needed to facilitate change.** Support programmes should consider factors such as: socio-economic status; local authority support; tenure; and rurality, because changing behaviours is particularly hard for particular groups.

**3) A large-scale campaign of public communications and engagement is needed to secure popular support and 'buy-in' for Scotland's climate change targets**, and for the 'habitual' and as well 'one-off' behavioural changes needed to meet them. This is essential

<sup>3</sup> CAS ran a workshop with key stakeholders to discuss the research findings in May 2018.

<sup>4</sup> <https://www.cas.org.uk/publications/warming-scotland-energy-efficiency-putting-consumers-first>

<sup>5</sup> The Individual Social Material (ISM) Tool5 is a model used to identify and tease apart the multitude of factors which can influence behaviour

so that the people of Scotland, as well as the Scottish Government, genuinely aspire to achieve such change together.

**4) Further clarity will need to be provided to delivery organisations, local authorities and consumers themselves to understand the scale of behaviour change needed, as well as the most appropriate means to achieving this.** In particular, as this relates to the consumption linked to consumer habits and lifestyles.

5) In order to bridge current gaps in knowledge about what may motivate certain people to change their behaviours (particularly those who are not interested in climate change), there is a need for research. Better understanding of current trends, attitudes and motivations for change amongst consumers will be paramount to developing appropriate supports and interventions.

## 10. Key Findings from research CAS commissioned

The following findings incorporate results from the review of Scottish climate change policy documents as well as points raised and insights from stakeholder interviews. The research found that:

- 41 behavioural expectations were identified across the policies, of which seven were explored in depth.
- A number of the targets for achieving emissions reductions through changes to consumer behaviours are not explicit in Scottish climate policy documents. It was noted that the 'one off' changes to behaviours were more detailed and better considered than the 'habitual' behaviour changes. Habitual behaviours are more complex to understand and influence.
- This was linked to an over-arching approach that explored how to make current consumption more efficient (e.g.: more efficient air travel) rather than looking to change social practices linked to consumption (e.g. taking trains instead of flying).
- Four areas which are likely to influence how certain policies will impact individual consumers differently were:
  - those living in urban compared with rural areas
  - the socio-economic status of consumers
  - their local authority area
  - consumers' tenure.
- While most behaviours identified will reduce household costs over time - such as reducing energy use in the home - a number of changes, such as installing new low carbon heating systems and installing energy efficiency measures, require significant up-front financial investment.
- The lack of clarity around some of the targets for behaviour change was noted as indicative of the uncertainty as to how the policy ambitions will be achieved.

Interviewees expressed concerns about a lack of clear routes to delivery which could support widescale behaviour change, in particular regarding everyday habitual behaviours (e.g. energy use in the home).

- At present, a gap appears to exist between consumers' awareness of the need to change behaviours and the momentum needed to achieve Scotland's emission-reduction ambitions. In order to bridge this gap, tough decisions will be required by the Government, which may involve increased regulation as one of the means to influence behaviour at scale.
- In spite of some of the short-comings of the application of the ISM Tool or the extent behaviour change was considered in policy development, the Scottish Government has laid significant groundwork on which to build. There is an awareness of the benefits of behaviourally-informed decision making within Scotland, and some recent innovative pilots have been run which will inform future policy and planning.