

Environment, Climate Change and Land Reform Committee

Climate Change (Emissions Reduction Targets) (Scotland) Bill

SUBMISSION FROM Jennifer Rogers

Stronger, earlier, targets are essential. I supported the Friends of the Earth call for a net zero target by 2040 in last year's consultation and am disappointed the feedback from 19,000 people hasn't been acted on.

While the bill has massive strengths (inclusion of all GHGs not just carbon, inclusion of aviation, limits on use of offsetting), I fundamentally disagree with the argument that it wouldn't be credible to set a bolder target because there is not yet a well-defined feasibility path to achieve it.

The current scenarios used by the CCC (or any other body) will almost certainly be wrong - pace of technological growth and change is unpredictable, disruptive innovations will emerge, social norms and attitudes will change in unforeseen ways. Why not acknowledge this and set earlier more ambitious targets? It would not reduce Scotland's credibility to recognise through the bill that new means of emissions reduction will be found in future.

There are plenty of examples of disruptive developments which parliament could use to support this stance, not least the fact that we've met the existing 2020 target already.

Strong legally binding targets, with the right governance framework to ensure they cannot be reversed and they influence all relevant policy decisions will provide certainty to markets and investors not only in Scotland but worldwide. In a post Brexit world, the signals provided by clear legal obligations are likely to be even more valuable to investors than usual.

Watertight commitment to ambitious targets is likely to drive investment in innovation (not just technical but also social, economic and environmental) which could enable Scotland to develop skills and products which will boost the economy.

Conversely, failure to act decisively now, particularly in the short term, might be lower cost now but will only increase the overall cost of dealing with the consequences of climate change.

Although the costs of climate change can be measured economically, financial measures don't really capture the predicted adverse impacts on public health, social disruption through displacement of climate change refugees or irretrievable loss of biodiversity due to wildlife's inability to adapt to rapidly changing environments.

Just as with the recent progressive changes to income tax, I believe many people including myself would support more investment now (funded by those who are more able to pay) to support policies which would deliver emissions reductions.

This is why I particularly support stronger interim targets, as well as setting a date now for the net zero target. Limiting GHG emissions in the near term is necessary to achieve the goals agreed in the Paris COP negotiations. The longer it is left to set a net zero target, the more likely the trajectory of emissions reductions will not drop fast enough early enough to limit climate change as planned.

Specific points about the bill:

Ability of government to act against advice received by a relevant body: given the scientific confidence in adverse impacts of climate change, it seems inappropriate to allow the government not to set stronger targets when advised to do so, simply by making a statement to parliament explaining why the advice will not be followed. I understand the target setting criteria include impacts on diverse areas, but this appears to allow the government in power to prioritise avoidance of short term negative impacts over long term benefits. Also, given the relatively cautious advice from the CCC for targets in this bill, it doesn't seem right to allow future advice to be overridden.

Time-lag between shortfall in meeting annual target and requirement to make up shortfall: it appears the previous consultation received feedback about this which hasn't been acted on in the current bill. If Climate Change Plans are only made every 5 years there could be a significant lag in making up shortfalls. As above earlier action is more significant than later action in limiting climate change. If targets are missed in consecutive years this time lag could weaken the framework to achieve targets and make it ineffective.

Timeline for setting Climate Change Plans: if the first plan does not have to be set until 5 years post bill implementation, it appears there could be several years without clear policy direction to meet increased interim targets. Since early action is critical, it would be useful to shorten this timescale - many policy and budget decisions could be taken while the first plan is being developed which would hinder Scotland's ability to meet the proposed targets, or the stronger targets many people support.

Point about the call for evidence:

I don't think the way this was framed on the website is helpful. The public were primarily encouraged to respond with pledges of what they will do reduce emissions, rather than give their views on the bill and its proposed targets. There are two problems with this:

1. It presumes that the public agree with the proposed targets. From a democratic perspective, people may support higher or lower targets and it's inappropriate to avoid asking the question.
2. Fundamentally the bill is about what the government will do, not individuals, so the call for evidence should be asking what the public thinks the government should do, not what individual actions they will take. Individual buy in and action is essential, but individuals' agency is limited by their environment, and this is determined by government policy decisions. For instance, transport choices are determined by availability and price of

different options, influenced not only by transport policy but also planning policy (are new housing and retail developments incentivised in locations where access is only possible by private car?), educational policy (are children from the same family able to go to the same school, close to where they live?) etc.

Favourable conditions for individual action will flow from the bill (or not, if the governance framework doesn't support effective implementation). Even the people most dedicated to personal action will have to make trade-offs because they are constrained by what is available and what they can afford – the limits on individual behaviour will only change as a result of budget and policy decisions driven by a strong legal obligation to meet emissions reductions targets.