



**WWF** *for a living planet*

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25<sup>th</sup> February 2005

Dear Sirs,

## REVIEW OF THE SCOTTISH CLIMATE CHANGE PROGRAMME WWF SCOTLAND RESPONSE

Thank you for the opportunity to respond to the review of the Scottish Climate Change Programme. Our colleagues at WWF-UK are also making a full response to the DEFRA consultation on the UK Climate Change Programme. In this response, a number of general comments are followed by answers to selected questions from the consultation paper.

WWF Scotland is part of the largest environmental organisation in the world. Working in nearly 100 countries, WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature. WWF works to conserve the world's biological diversity, ensure the sustainable use of renewable resources and to promote the reduction of pollution and wasteful consumption.

One of WWF's international priority areas of activity is on climate change and we have taken a particular interest in the emissions reductions plans of the developed countries. WWF Scotland will soon be publishing a report which reviews the successes and failures of the Scottish Climate Change Programme so far. Some of this response is based on that report, which is included in draft as Appendix 1.

The main points we would like to make are these:

**Making progress** - reducing climate change emissions is not rocket science. Essentially, we need to do more of what was promised in 2000 and start action in the areas that were largely ignored then. We need:

- Scottish and sectoral targets
- A more strategic approach to policy making
- Immediate further action on the obvious things

**Urgency** - Climate change is the biggest environmental threat. Scientists and politicians are starting to agree that we must try to limit the final global temperature increase to less than 2°C above pre-Industrial



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temperatures. Above this level major changes start to happen – eventually the Greenland ice-sheet will melt, the Amazon Rainforest will disappear, life in tropical countries will become untenable and 100,000s of species will die. This means we have about 20 years left to take serious action to reduce emissions. It is the generation alive and in power today who will decide the difference between a future of climate change we can cope with or climate chaos. In this context, it is the revised Scottish Climate Change Programme which will demonstrate whether Scotland is serious about playing its part in this fight.













**Progress so far** - important progress has been made at both UK and Scottish levels. In particular, this includes the Prime Minister’s commitment to a 60% reduction in CO<sub>2</sub> emissions by 2050 and the Scottish Executive’s two renewable electricity targets. However, our review of the Scottish Climate Change Programme concludes that little emissions reduction has resulted from the Programme and that much more needs to be done to make the Programme effective over the next five years.

According to official figures, Scotland’s climate change emissions fell by 5.6% between 1990 and 2002. The overall UK reduction was much greater at 15%, and England managed 18%. Scottish emissions of carbon dioxide, the main greenhouse gas, fell by only 3.2% between 1990 and 2002, compared to UK targets of 20% by 2010 and 60% by 2050. The UK reduction was 8.7% and that in England, 11%.

Much has been made, especially by Ministers, of the unfairness of comparing Scotland with England, where a significant part of the emissions reductions are due to a ‘dash for gas’ in the electricity sector. There are two responses to this. Firstly, given that there are no deep coal mining jobs left in Scotland to protect, the Scottish Executive should be encouraging the earliest possible replacement of coal capacity with gas, so that Scotland can gain the same ‘dash for gas’ benefit. Secondly, Scotland *did* benefit from what we might call a ‘dash for call centres’ – CO<sub>2</sub> emissions from industry declined by 32% between 1990 and 2002, largely as a result of the closure of the Ravenscraig steel works. In fact, if Ravenscraig were still operating today as it was in 1990 Scottish CO<sub>2</sub> emissions would be more than 1% above 1990 levels in the 2002 figures, rather than 3% below. It is legitimate to ask why total emissions has declined by so little given the fundamental restructuring of the Scottish economy which has taken place over this period.

The table below summarises progress so far, based on the report in Appendix 1:

	<b>Commitment and our comment</b>	Para
	Better emissions data – better but latest is only 2002	9
	Deliver savings from all sectors – emissions higher in 2002 than 1990 for energy, industry, transport and domestic sectors	12
	More Combined Heat and Power schemes – growth well below target	19
	More energy from renewable sources – yes and a new target for 2020	21
	No decision on nuclear power – still no commitment to phase out	29
	Encourage business to reduce emissions – lack of engagement in Scotland	33
	More funding for energy efficiency – more money, plenty of activity but little idea of actual impact	35
	Climate Change Levy will drive business energy efficiency – raised money for efficiency work but not a direct incentive as proposed	37

	Measure the carbon savings from the Waste Plan – not yet but potentially very big savings	43
	Transport Bill Scotland will bring new savings – only Edinburgh considering congestion charging	51
	Freight Facilities Grants save carbon	52
	Better estimates of CO <sub>2</sub> from traffic – ignored in latest Transport White Paper	55
	Home Energy Conservation Act will reduce emissions from homes – slow progress	62
	New Building Regulation will make homes and offices more efficient – only applies to new buildings	68
	Forestry Strategy will help reduce emissions – little action	76
	Greening Government targets for CO <sub>2</sub> – Scottish Executive almost certain not to meet their target	87
	NHS in Scotland saving 2% more energy every year	99
	SEPA saving 20% CO <sub>2</sub> by 2010 – recent wobble but still on course	101
	COSLA will produce a Sustainable Energy Strategy for councils – still in draft	109
	Public awareness raising on climate change – climate included in Do A Little, Change A Lot	118

The report concludes:

“While the intentions of the Scottish Executive have been laudable, the outcomes suggest a lack of practical control or indeed any strategic overview of the actions in Scotland (and their economic and environmental cost) that will reduce greenhouse gas emissions to a greater or lesser degree.”

“The Scottish Climate Change Programme was long on aspiration but short on quantifiable targets.”

“Although a lot of political activity has taken place, emissions outcomes have been extremely disappointing”

“It is worth emphasising that the quantified Scottish savings in the Scottish Programme ... equates to about 0.21MtC ... however, the potential for reducing emissions from Scottish policies, such as effective waste, transport and land use management, are likely to be orders of magnitudes higher than this.”

To summarise, the Scottish Climate Change Programme did not make any commitments on some of the areas where the biggest gains are to be made, did not quantify some other commitments and, while some progress has been made, at this halfway stage it has failed to deliver on many of the commitments it did make.

**Policy Integration** – one of the problems our report identifies is the lack of ‘joined-up’ government on climate change: “none of the ‘national strategies’ identified in the Programme or since – Land Use, Transport, Waste – have produced clear greenhouse gas emissions implications of their activities.”

Our review concludes that in the “recent white paper, Scotland’s Transport Future ... little quantified information was provided on how to manage or control transport-derived greenhouse gas emissions in Scotland.”

In late 2000, Dr Sylvia Jackson MSP asked a PQ of the then Transport Minister Sarah Boyack MSP regarding “what assessment has been made of the impact on climate change emissions ... of the extra spending on transport announced by the Minister for Transport and the Environment.” This announcement included the first funding for the M74 Northern Extension. The Minister’s response was that “a research project is currently underway to identify an appropriate methodology to forecast future traffic levels in Scotland and produce interim traffic and emission forecasts for local air pollutants and carbon dioxide where possible. The current stage of this work should be completed by the end of the year.”<sup>1</sup>

In August 2004, Sarah Boyack MSP asked pretty much the same question of the Transport Minister. Nicol Stephen MSP gave a lengthy and detailed response which made it clear that the Scottish Executive still has no idea of the climate change impact of its transport plans.<sup>2</sup>

Similarly, the Forward Strategy for Scottish Agriculture is vague on climate change, suggesting further research on the impacts that farmers may expect, rather than any specific on what farmers can do to minimise emissions. The Scottish Forestry Strategy calls for more research but proposes no action. The National Waste Strategy does not quantify its (positive) impact on climate change emissions despite these figures being available.

The Scottish Executive as a whole is not taking climate change seriously. Specifically, Ministers and departments are not considering the impact of new policies on climate change emissions, or the impact that climate change will have in their sector. Combined with a set of Scottish targets, the Scottish Executive needs to use the new mechanism of Strategic Environmental Assessment to measure any new proposals against climate change, specifically to ensure that they contribute to the reduction of emissions and that they allow for the changing climate of Scotland in the future.

**Targets** - one key part of any strategy to reduce emissions should be to set targets which show how much Scotland will do in contributing to the UK’s 20% emission reduction target. Many sectors from hospitals to schools have targets and the current targets for renewable energy have been very successful in stimulating that industry. Targets for climate change emissions would help drive activity flowing from an enhanced version of the Scottish Climate Change Programme. Targets would help us all understand what was expected of each of us at home, in our work and as we travel about. Our report concludes: “the Scottish Executive, in consultation with the UK Government, should make it clear what emissions reductions it expects by 2010 in different parts of the economy.” We have no doubt that progress on emissions would have been better and national policies more integrated if a Scottish emissions reduction target for 2010 had been set in the 2000 Programme.

It has been argued that it would be too hard to set a target for Scotland because many of the controls needed to reduce emissions are in the hands of the European Union, the UK Government or even private businesses. However, a large fraction of UK emissions are now dependent on the EU Emissions’ Trading Scheme, yet the UK Government is still talking about its 12.5% target and 20% ‘goal’ for 2010. Similarly Europe’s smaller nations are subject to similar external influences, yet are still working to national targets. A Scottish target would be a combination of (a) a best estimate of what Scotland can achieve if Europe and the UK Government behave as they say they will and (b) a statement of the scale of Scotland’s aspiration to do its bit.

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<sup>1</sup> <http://www.scottish.parliament.uk/business/pqa/wa-00/wa1109.htm>

<sup>2</sup> <http://www.scottish.parliament.uk/business/pqa/wa-04/wa0923.htm>

It has been suggested that emissions resulting from the generation of electricity which is exported to England will confuse the picture of any Scottish targets. This is simply dealt with – emissions relating to exports of electricity should be excluded from the main Scottish targets and should be subject to a target of their own.

The latest inventory figures make it clear that Scottish CO<sub>2</sub> emissions were higher in 2000 than in 1990. Thus Scotland failed to play a full part in delivering the CO<sub>2</sub> stabilisation target agreed at the Earth Summit in 1992. It is clear that, while the UK as a whole might just reach the Labour manifesto commitment of a 20% cut in CO<sub>2</sub> by 2010, this will not be achieved in Scotland. A challenging but achievable target for Scotland would be to meet the 12.5% 6-greenhouse-gas target by 2010. This would see Scotland playing its full part in delivering the UK's obligation under the Kyoto Protocol.

Although an overall Scottish target is the most important first step, a target (or at least an indication of the scale of change required) for each sector would really drive progress on reducing emissions. These targets would build on the existing targets like the road traffic stabilisation target and the renewable electricity targets but would be based on a broader analysis. At present, it is easy for any sector to ignore climate change and simply assume that some other sector will produce the necessary reductions. Sectoral targets would remove this excuse.

The Scottish Executive has named its aspiration for 40% of electricity to come from renewables by 2020. As well as setting an emissions reduction target for 2010, it should quantify its ambitions on future climate change emissions beyond 2010. Firstly, it should confirm that Scotland wishes to deliver at least the 60% by 2050 cut in CO<sub>2</sub> emissions proposed by the Royal Commission on Environmental Pollution and endorsed by the Prime Minister. Secondly, it should indicate what it considers to be a proper step on the way from here to there by 2020.

**Transport** - the Department of Trade and Industry has published projections for UK carbon dioxide emissions through to the year 2020. These show declining emissions from the power sector and industry and the inexorable rise of emissions from the transport sector – transport will overtake energy as the largest source of CO<sub>2</sub> emissions around 2015.<sup>3</sup>

The revised Scottish Climate Change Programme needs to put a stop to new road plans like the M74 extension and the Aberdeen bypass while they are reviewed, support positive measures like Edinburgh's congestion charging plans and limit the expansion of airports and air travel. In particular, the Executive should put an end to all major road scheme plans which increase capacity and strengthen the planning system to impose further restrictions on out-of-town developments which generate car usage.

The Scottish Executive's current traffic stabilisation target is both weak and so far in the future as to be meaningless on its own. Interim emission reduction targets for transport should be set so that short term progress can be measured, for which the current Administration will be held accountable.

As suggested above, transport policy should be reviewed against its climate change impacts.

**The Sustainable Development Strategy** – action to combat climate change is a key indicator of how seriously we take the challenge of sustainable development. However, it makes no sense at all to consult

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<sup>3</sup> The Scottish inventory figures appear to show a slightly different pattern but are not particularly credible on transport emissions even after the latest revision of the methodology.

on climate change again as part of the development of the Scottish Sustainable Development Strategy, as has happened in the DEFRA 'Taking it on' process.

**Consultation** – in general, we are very disappointed with this review of the Scottish Climate Change Programme. Although this is the mid-term review of a set of activities which runs from 2000 to 2010, the latest data included for emissions is for only 2002. In some areas, such as waste policy and the IPPC regime, the Scottish Executive fails to report whether Scotland is moving in the right direction or not, despite the figure presumably being available. In common with the modern style of consultation, there are regrettably few new proposals from the Scottish Executive, only open questions to the consultees, wasting every-one's time and making it unlikely that any new action will flow rapidly from the consultation process.

#### ANSWERS TO SELECTED CONSULTATION QUESTIONS:

##### TARGETS

Qs.1-5 see Targets section above.

##### EU EMISSIONS TRADING SCHEME

Q.7 Should the UK consider pressing the Commission to bring forward a proposal or consider applying to include other sectors and gases at a national level?

All greenhouse gases, based on their Global Warming Potential, should be included in the scheme in the long term. Including aviation on the same basis as other sectors would be a mistake, introducing a tremendous distortion into the carbon trading market and adding a meaninglessly small extra amount on the price of flights. Aviation needs to be addressed through direct taxation or a special version of emissions trading.

Q.8 How should this contribution be determined?

The cap in phase II of the EU Emissions Trading Scheme should be set to comfortably deliver the UK and Scottish climate targets and to make a significant contribution to the reductions need on the way to the 60% CO<sub>2</sub> cut by 2050. Lessons should be learnt from the UK's failure to increase allocations to industry between its draft and final National Allocations Plans.

##### ENERGY SECTOR

Q.13 What priority should be attached to demand-side management (energy efficiency) compared with supply-side (e.g. renewables) solutions?

The renewable electricity targets for 2010 and 2020 have been very successful in encouraging proposals for wind farms on land. However, more needs to be done to guide applications to the most appropriate sites, to develop heat-producing renewables and to encourage other forms of renewable energy.<sup>4</sup> With CO<sub>2</sub> emissions from electricity generation growing by 18% between 1990 and 2002, it is clear that action on the demand side is urgently needed. Although both demand-side and supply-side measures are important, less attention has been given to the demand side and this area should be made a priority.

Q.14 Do you support the proposal for developing a Scottish Energy Efficiency Strategy?

This is a stupid question, what sane person would not support a Scottish Energy Efficiency Strategy ?

Q.16 Which sectors should be given particular emphasis?

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<sup>4</sup> WWF Scotland's submission to the Enterprise Committee's inquiry on renewable energy is available at:

<http://www.wwf.org.uk/filelibrary/pdf/playingourpart.pdf>

Energy use in smaller businesses, offices and homes all require much more attention.

Q.17 In which sectors could there be particular difficulties in realising additional energy efficiency savings? How might these difficulties be overcome?

Businesses have been given messages about saving energy for more than 30 years. Endless convincing case studies and trial schemes demonstrate that it saves money and makes sense to invest in energy efficiency. Schemes like those run by the Business Environment Partnership achieved remarkable results. Yet take up is still low. This is because the attractive carrot is not matched by a meaningful stick – energy prices are low and there is little or no regulatory incentive to save energy.

The Scottish Executive needs to do all it can to provide the stick which will incentivise the carrot and mainstream energy efficiency in business thinking. This should include greater use of SEPA's IPPC powers and energy efficiency conditions on any grant of public money to businesses. There is also strong case for much greater public investment in energy efficiency for both the business and domestic sectors, now that carbon has a traded value. Increased levies on business would fund this investment which would recycle back into business benefits for those companies taking action on energy efficiency.

Q.18 What additional specific energy efficiency initiatives and measures could the Scottish Executive introduce to support existing policies?

The Executive should enthusiastically implement the EU Energy in Buildings Directive, rather than, as seems likely, seeking a derogation to delay it.

Q.19 Should the Scottish Energy Efficiency strategy set specific targets for energy efficiency savings? What form should these take?

An overall energy demand stabilisation target and sectoral percentage reductions in energy use for 2010 and 2020, aimed at delivering the Scottish climate change targets.

Q.20 How could the existing arrangements be better co-ordinated within Scotland?

The plethora of initiatives and bodies facing both the domestic consumer and the business energy user are very confusing. Even if the underlying bodies remain, the client should have an independent, one-stop access point for all things to do with energy.

Q.21 What other new initiatives might be taken forward at the national, regional or local level?

The Scottish Executive should work with the UK Government to get an early decision to rule out the construction of new nuclear reactors.<sup>5 6</sup>

## IPPC

Q.22 How might further energy efficiency improvements be introduced by industry, particularly in the small business sector?

See responses to Qs. 17, 19 and 20 above. Place requirements on industries and businesses which spend over a certain percentage of total overheads on energy to employ an energy manager. Set targets to improve energy efficiency in business and industry, and for energy audits to be published as part of annual reports.

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<sup>5</sup> A recent report for WWF showed that the whole UK could meet climate targets through energy efficiency and renewable energy, and without the need for new nuclear reactors.

<http://www.wwf.org.uk/climatechaos/powerertosaveclimate.pdf> or summary

<http://www.wwf.org.uk/climatechaos/espowertosaveclimate.pdf>

<sup>6</sup> WWF position statement on nuclear power: [http://www.panda.org/downloads/climate\\_change/nuclearpower.doc](http://www.panda.org/downloads/climate_change/nuclearpower.doc)

Q.23 The Executive would welcome views on how the energy efficiency conditions set by SEPA in PPC permits are working in practice.

So would we, why did you not report on their success or failure in paragraph 78 of the consultation ?

#### TRANSPORT SECTOR

Qs.28-31 See Transport section above.

#### RESIDENTIAL SECTOR

NB for this section, the questions in the consultation document are different from those in the response template. This is a shame since we were looking forward to giving a biting sarcastic answer to the question about the 'possibilities identified here for delivering additional emission reductions' given that there is *nothing* new proposed in this section.

Q.32 What scope is there for additional savings from this sector?

The consultation document's figures cover only the direct use of fuels like coal, oil and gas in the residential sector and therefore do not cover the large and growing electricity use in this sector. The DTI predicts rapid growth in CO<sub>2</sub> from the domestic sector so additional savings are essential.

Q.33 What additional measures might the Scottish Executive introduce to support existing policies?

See response to Q.18.

#### AGRICULTURE, FORESTRY AND LAND USE

Q.36 What additional measures might the Scottish Executive introduce to support existing policies ?

See section above on Policy Integration. Around 20% of Scotland's climate change emission comes from the land, mainly because of the way we manage land for forestry and agriculture. The role of livestock farming in emissions of climate change gases was also highlighted by a strong recommendation within the *Custodians of Change* report into farming and the environment but the Scottish Executive's Forestry and Agriculture Strategies have both failed to take these issues seriously.

Our forthcoming report concludes: "although land use is the second biggest contributor to Scottish greenhouse gas emissions ... only one of the 52 actions in the Forward Strategy [for Scottish Agriculture] relates to climate change, and this refers to research only" and "there appears to be a mismatch between the Forest Strategy statements and the importance of the emission sequestration associated with afforestation within the Climate Change Programme."

The Forestry Strategy is due to be reviewed this year, providing the ideal opportunity to address the emissions caused by this sector. The Agriculture Strategy is likely to be 'refreshed' soon and subsidy schemes should be revised to incentivise farming which reduces emissions and helps Scotland cope with floods.

#### PUBLIC SECTOR

Q.41 What additional measures might the Scottish Executive introduce to support existing policies?

Some local authorities are taking climate change seriously. In particular, Aberdeen City Council has developed a strategy and set itself a target. Some public bodies, like the NHS in Scotland, have set themselves tough energy reduction targets. All local authorities and public bodies should be set targets and obliged to contribute to emissions reductions.

#### WASTE

Q.44 What scope is there for additional savings from improving waste management practices?  
Given that the WISARD tool used to develop Area Waste Plans and feed into the National Waste Plan, modelled greenhouse gas emissions in detail, it is very disappointing that this section does not present any figures.

Q.46 What are your views – specifically, what you see as the advantages and disadvantages – on the possibilities identified here for delivering additional emission reductions?  
No additional possibilities appear to be proposed.

#### SCOTTISH BUILDING REGULATIONS

Q.49 What additional measures might the Scottish Executive introduce to support existing policies?  
See answer to Q.18. Changes in Building Regulations only have a slow effect on the overall Scottish building stock, so future Building Regulations should be made binding on existing buildings at change of use or major refurbishment.

#### SCOTTISH ADAPTATION STRATEGY

Q.51 What further evidence of the impacts of climate change in Scotland is needed to enable effective adaptation, at the national, regional and local levels (in both the public and the private sector)? Who should be responsible for producing this information?  
The regional scenarios, work of UKCIP and forthcoming work of SCCIP provide the right kind of information. Government should continue to support this kind of work. However, the current disparate strands of work should be brought together into a Scottish Adaptation Strategy, co-ordinated by the Scottish Executive (possibly through SCCIP) and the gaps in this plan identified and filled.

#### A PARTNERSHIP APPROACH

Q.55 What should the Executive do to further its partnership approach to encourage a coordinated response to climate change across the organisation?  
See section on Policy Integration above. Partnership is all very well but some leadership, exercised through setting a Scottish and sectoral climate targets, is also needed.