



Scotland's Climate Action Plan

A Plan to Match Scotland's Climate Ambitions

“The need to tackle climate change, first and foremost, is an overwhelming moral imperative – but it is also a significant economic opportunity. It is one that all of us should aim to seize.”
Nicola Sturgeon MSP, Speech to Arctic Circle Assembly, 7th October 2016^[1]

Summary

In 2009, the Scottish Parliament unanimously passed the most ambitious climate change legislation anywhere in the world. In 2016, statistics were published that showed that Scotland's climate change emissions in 2014 were 45.8% lower than in the 1990 baseline year, and in addition that for the first time an annual emissions reduction target (the 2014 annual target) had been hit. These achievements are a clear demonstration that it's possible to cut emissions whilst also building a progressive and productive society.

However, independent sources, including the recent UK Committee on Climate Change progress report [2] and briefing figures from SPICE [3] make it clear that Scotland's progress to date is heavily dependent on progress in the electricity and waste sectors. Soon, these sectors will be largely decarbonised and further reductions will have to come from other parts of the economy, both to meet targets and to ensure that Scotland remains a world leader in climate action.

The Scottish Government must now apply the same leadership it has shown in the renewable electricity sector to the areas which are falling behind, including heat, land use, energy efficiency and transport.

We know from a series of recent high profile economic reviews - from the Global Commission's New Climate Economy report [4] to a major UK report by Cambridge Econometrics [5] - that climate action can enhance the economy's performance over a high carbon 'business as usual' approach. Scotland can be a global leader in low carbon living, implementing policies that bring about warmer homes, better transport and cleaner energy. Implementing Scotland's Climate Act means not only reducing emissions, it also means tackling fuel poverty, giving us cleaner air and healthier lifestyles, and creating new jobs and economic opportunities.

Now, the development of the Third Report on Proposals and Policies (RPP3 or Climate Action Plan) provides an opportunity to put in place the plans needed to realise those opportunities and address the challenges that climate change poses. This paper sets out WWF Scotland's recommendations on how to do that and provides the criteria by which we will judge the strength of the Scottish Government's Climate Action Plan [6].

Vision

“If we choose low-carbon investment we can generate strong, high-quality growth – not just in the future, but now. But if we continue down the high-carbon route, climate change will bring severe risks to long-term prosperity.”

Nicholas Stern, Co–Chair of the Global Commission on the Economy and Climate

The benefits of a zero carbon future

If we act now, Scotland can enjoy the benefits of a zero carbon future. By front-loading bold, ambitious policies, the Climate Action Plan can play a vital role in creating a Scotland which is healthier, happier and more prosperous, with a safe, clean and flourishing environment which is protected for generations to come.

A zero carbon Scotland isn't just good for the environment but also for our public services, businesses and communities. By acting now, we can cut pollution, meaning cleaner air and less waste; we can make the scourge of fuel poverty a thing of the past and ensure everyone has a warm, dry home; we can improve our mental and physical health and reduce pressure on health services; and we can create thousands of new jobs in sustainable industries.

How to get there

The new Climate Action Plan is a chance to implement a range of bold, ambitious policies which can transform Scotland for the better. There is no shortage of policy options that could fill this gap, and WWF Scotland is gathering a number of international policy case studies from countries with similar economies to Scotland's, to showcase experience from elsewhere.

And for the Scottish Government, there is no shortage of policy options that are bold, ambitious and which would transform the nation for the better. For example, key priorities for Scotland's civic coalition, Stop Climate Chaos Scotland, for each of the main sectors in the Climate Action Plan include:

In energy, the Climate Action Plan should set a target to source at least 50% of all of Scotland's energy from renewables by 2030, with individual targets for each of the heat, transport and electricity sectors. Independent research [7] for WWF Scotland suggests that this would put Scotland on course to meet its climate change targets in a cost-optimal way, and is achievable by increasing the share of renewables in each sector by 2030 as follows:

- 143% of electricity consumption from renewables
- 40% of heat from renewables
- 18% of transport powered by renewables

The Climate Action Plan should dramatically improve the energy efficiency of all our homes and buildings. By introducing minimum standards for energy efficiency in private homes and by setting a target of bringing all homes up to an EPC C standard by 2025, the Scottish Government can ensure that no one lives in a cold, damp home. Such a move would also improve public health and create up to 9000 jobs. Implementing and fully funding the promised National Infrastructure Priority on energy efficiency for all buildings as soon as possible is a vital step in reaching a zero carbon future.

The Climate Action Plan should include transformative policies on low-carbon transport, where emissions have barely reduced from their 1990 levels. This could, for example, include committing to invest a minimum of 10% of the transport budget in active travel. Increasing investment in walking and cycling will not only cut emissions but also reduce air pollution and congestion, therefore improving health and cutting costs for businesses and the NHS.

Finally, in the agriculture sector, the Climate Action Plan must deliver a package of compulsory low-carbon farming and land-use measures. Such measures should include compulsory carbon audits, precision farming techniques and advice and incentives to help cut costs for farmers and make a dramatic impact for the climate in a sector which currently accounts for a quarter of all emissions.

Building on the Second Report on Proposals and Policies

The approach which the Scottish Government has taken in producing the new Climate Action Plan shows some positive signs of developing further approaches taken to previous Reports on Policies and Proposals. For example, the new energy model informing the Scottish Government about the most cost-effective routes to achieving climate change targets is a positive step forward.

However, in order to ensure that the RPP3 delivers the kind of transformational action needed to match Scotland's ambitious climate targets, it is important to learn from what worked well in the previous Report on Proposals and Policies (RPP2) and to acknowledge where it fell short.

Ahead of RPP2 WWF Scotland called on the Scottish Government to make the report credible, ambitious and transparent [8]. These criteria were shared by Stop Climate Chaos Scotland (SCCS) and formed the basis for our collective assessment of RPP2 [9].

Whilst WWF Scotland described RPP2 as comprehensive in its intent, both WWF Scotland and SCCS were critical of the Report and were of the view that it lacked credibility, ambition and transparency. Both the coalition and WWF Scotland called for the balance of proposals and policies to be redressed in favour of policies [10]; for action to be more front loaded instead of pushed back to 2020; and for the document to be made more transparent, to support comparison between RPP1 and RPP2 and to enable external assessment.

Credible

RPP2 lacked credibility due to an over reliance on proposals rather than policies and on anticipated changes to the EU's level of ambition. In the RPP2 future emissions targets would only be met if the full suite of policies *and* proposals were implemented, yet many proposals had no firm date or plan for implementation, and in some cases no technical detail as to how proposed emissions reductions would be achieved, referring simply to 'technical abatement potential'. Therefore, the new Climate Action Plan should redress the balance in favour of policies over proposals and avoid backloading action until later years. The Plan must show how the figures for anticipated emissions savings have been calculated in order to increase credibility and transparency.

Ambitious

RPP2 relied too heavily on voluntary measures, behaviour change and factors beyond the Scottish Government's control, such as a change to the level of ambition in the EU's climate targets. The Second Report also contained only proposals, rather than policies, at the domestic level on transport, significantly weakening the ambition of the RPP2. The new Climate Action Plan should set out clear policies in all sectors and detail how actions by the Scottish Government will result in a Plan which matches Scotland's ambitions.

Transparent

As RPP2 contained few milestones, the Climate Change Delivery Board's check point monitoring report is a welcome addition [11]. However, this tends to describe what is happening rather than examining causes, effects and challenges to be overcome when policies are underperforming. Therefore its usefulness for policymakers is limited. Furthermore, it is often unclear what assumptions underpin the abatement attributed to individual policies in the monitoring framework or the wider RPP2. The new Climate Action Plan should include a clear framework for monitoring and evaluation, including milestones for key decisions and actions for each policy. It should also include clear information on both the assumptions behind abatement attributed to individual policies and provide sufficient information to assess whether emissions reductions set out in previous RPPs are being achieved by the relevant policies.

The MATCH Principles

The UK Committee on Climate Change's report in September 2016 made the following recommendations for the Scottish Government's new Climate Action Plan [12]

“Ensure objectives are specific, outcome-focused, and measurable to allow effective monitoring and evaluation.

Focus on the core set of policies and actions that will have the biggest impact, particularly in transport, buildings and agriculture.

Take into account wider benefits as well as the costs of climate change actions, e.g. improving health, saving money, alleviating fuel poverty, preserving Scottish ecosystems and biodiversity, providing local jobs and services, and helping the economy of Scotland grow.”

In this briefing, we build on these recommendations, as well as on WWF Scotland's longstanding view that the Scottish Government's Reports on Proposals and Policies should be credible, ambitious and transparent.

In order for Scotland to meet its world-leading climate ambitions and to realise the benefits of a low carbon transition, we believe that the Scottish Government's new Climate Action Plan must MATCH all of the following criteria:

Measurable

Every policy in the Climate Action Plan should have specific, measurable outputs, expected climate outcomes and a timeframe for implementation.

Ambitious

The Plan should front load ambitious new policies to secure the biggest possible impact, particularly for transport, land use, heat and energy efficiency

Transparent

The Climate Action Plan should provide clarity on how each expected policy outcome has been calculated and which body is responsible for implementing each policy.

Credible

The Plan must show how all annual targets between now and 2032 will be met and should prioritise policies over proposals and regulation over voluntary action.

Holistic

The Plan should take account of the wider benefits of policies (e.g. social, economic and health), as well as detailing their climate and financial impacts.

Definitions and application of principles

In this section, we provide further definitions of each of these principles and detail how we will use them to assess the Climate Action Plan. When the Plan is published in draft form, we will use these criteria and the associated questions to help us judge whether we consider the Plan to be measurable, ambitious, transparent, credible and holistic.

Measurable

Every policy in the Climate Action Plan should have clear, measurable outputs, expected climate outcomes and a timeframe for implementation.

From Audit Scotland to environmental NGOs, there have been calls for the Scottish Government to ensure that the new Climate Action Plan incorporates ways of measuring and evaluating the Plan's success.

To assess whether the Climate Action Plan is measurable, we will ask the following questions:

- 1) Does each policy have a measurable output? For example, does the policy state how many measures (eg. homes insulated, renewable heating systems changed) are expected to be implemented under/result from this policy?
- 2) Does each policy include expected climate outcomes? For example, does the Plan detail the expected emissions savings resulting from the implementation of this policy?
- 3) Does each policy have a timeframe for implementation which includes clear milestones? For example, does the policy set a deadline for implementation and detail what actions are required, by when in order to make it happen? Does it set dates for review?

Ambitious

The Plan should front load ambitious new policies, particularly for transport, land use, heat and energy efficiency

Learning from RPP2, it is vital that the new Climate Action Plan sets out actions which can begin in the short term, rather than leaving them until the end of the RPP period. The new Plan must also include stronger policies on the crucial areas of transport, land use, heat and energy efficiency in order to achieve and potentially exceed our climate targets.

To assess whether the Climate Action Plan is ambitious, we will ask the following questions:

- 1) Does the Plan prioritise action in the immediate and short term instead of pushing ambitious policies back to the end of the RPP period?
- 2) Is the Plan limited by what action is required by current climate change targets or does it push beyond what is needed?
- 3) Does the Plan set out ambitious new policies in transport, land use, heat and energy efficiency which result in either matching or exceeding targets?

Transparent

The Climate Action Plan should provide clarity on how each expected policy outcome has been calculated and which body is responsible for implementing each policy.

WWF Scotland welcomes the introduction of the TIMES model for establishing emissions reductions targets in each sector of the economy and modelling ways in which those targets can be met. In order to give Parliament and the public confidence in the expected policy outcomes set out in the Climate Action Plan, the Plan should explain clearly how such outcomes were calculated.

To assess whether the Climate Action Plan is transparent, we will ask the following questions:

- 1) Does the Plan clearly explain how each policy's expected outcomes was calculated?
- 2) Does the Plan provide clarity on the extent to which anticipated emissions reductions are the result of planned Scottish Government policies or whether they are dependent on action at a UK, EU or international level?

Credible

The Plan must show how all annual targets between now and 2032 will be met and should prioritise policies over proposals and regulation over voluntary action.

Learning from RPP2, it is crucial that the new Climate Action Plan clearly shows how all annual targets will be met. In addition, given the failure of voluntary actions from RPP2 to achieve sufficient emissions reductions, the Climate Action Plan should prioritise regulatory and legislative change instead of relying on voluntary action. Finally, to redress the imbalance of proposals to policies in RPP2, policies should be prioritised in the new Plan.

To assess whether the Climate Action Plan is credible, we will ask the following questions:

- 1) Does the Plan clearly show how all emissions targets will be met? For example, does the Plan include overall and sectoral targets alongside an explanation of how each policy contributes towards meeting or exceeding them?
- 2) Does the Plan contain a larger proportion of policies than proposals?
- 3) Does the Plan favour regulation or legislative change over voluntary measures? For example, will the emissions reductions targets in the agricultural sector be enforced or are they dependent on voluntary action?

Holistic

The Plan should take account of the wider benefits of policies (e.g. social, economic and health), as well as detailing their climate and financial impacts.

Previous Reports on Proposals and Policies have recognised some of the wider benefits of moving towards a zero carbon future, including cleaner air and warmer homes. However, both RPP1 and RPP2 focused on emissions savings and the financial costs of implementation associated with each policy or proposal. In reality, each of the policies and proposals contained in these reports will have wider impacts. For example, a large scale energy efficiency retrofit programme will result in consumer savings as well as improved health for individuals currently living in cold, damp homes.

To assess whether the Climate Action Plan is holistic, we will ask the following questions:

- 1) Does each policy or policy area take into account the wider costs and benefits of implementation beyond financial and environmental elements? For example, are estimates of financial costs related to cycling infrastructure set against future savings in health spending, as well as environmental benefits from modal shift?
- 2) Does the plan include any form of impact assessment in relation to the social and health impacts of policies? Is there any attempt to assess the accumulation of these benefits?

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Endnotes

- 1) Full text of speech here - <http://news.scotland.gov.uk/Speeches-Briefings/Arctic-Circle-Assembly-2cb7.aspx>
- 2) Committee on Climate Change, Reducing emissions in Scotland 2016 progress report, published 13th September 2016: <http://bit.ly/2cUf91U>
- 3) Scottish Parliament Information Centre (SPICE), Climate Change: Subject Profile, published 25 May 2016: <http://bit.ly/1UOf2yu> (see in particular graph on page 16)
- 4) Available at <http://newclimateeconomy.report/>
- 5) For further details on this, see wwf.org.uk/climateeconomics
- 6) The first public draft of the Climate Action Plan will be published in January 2017
- 7) "The Energy of Scotland: Heating, moving and powering our lives from now to 2030" – Summary report by WWF Scotland, RSPB Scotland and Friends of the Earth Scotland, based on independent technical analysis by Ricardo Environment & Energy. Summary report available here: http://assets.wwf.org.uk/downloads/ricardo_energy_report_web.pdf
- 8) assets.wwf.org.uk/downloads/wwf_scotland_eet_evidence_on_rpp2.pdf
- 9) http://www.theclimatecoalition.org/sites/default/files/SCCS%20Written%20evidence%20on%20RPP2_RACCE_final_0.pdf
- 10) A "policy" is a course of action which has been wholly or largely decided upon whereas a "proposal" is a suggested course of action, the details of which might change as this course of action is explored further. This definition is set out in section 2.13 of the RPP2 <http://www.gov.scot/Resource/0042/00426134.pdf>
- 11) www.gov.scot/Topics/Environment/climatechange/scotlands-action/EmissionReduction
- 12) "Reducing emissions in Scotland: 2016 Progress Report", Committee on Climate Change, See page 9 of the Executive Summary, available here: <https://documents.theccc.org.uk/wp-content/uploads/2016/09/Reducing-emissions-in-Scotland-2016-Progress-Report-Committee-on-Climate-Change.pdf>

