

# Scotland's climate change plan

**Evidence to the Environment, Climate Change and Land Reform Committee  
Submitted - 25th January 2017**

## Overall

The Climate Change Plan is the product of a very large amount of work and contains many welcome measures, as well as painting an attractive vision of a future Scotland as a low-carbon country. However, delays caused by the use of the TIMES model and political trade-offs have led to a Plan which sometimes lacks detail, has had limited external input and is overly reliant on technological changes rather than more fundamental change. The monitoring framework is still being developed but there is insufficient information to interrogate Scotland's financial budget.

## Development and structure of the Climate Change Plan

Scottish Government civil servants have put in many long hours to produce the Climate Change Plan (CCP). We have had regular, useful contact with climate civil servants over many months, including a detailed seminar on how the TIMES model works. The use of the TIMES model has been helpful in exploring options and highlighting which sectors need to do more. This is a better approach than that of RRP1 and 2. However the TIMES model took much longer to get up and get running than expected and therefore delayed and derailed plans for more extensive stakeholder engagement.

The multi-stakeholder event held in December was of limited value since it was at a very late stage in the process, after many policy options had already been eliminated for technical or political reasons. Perhaps because it was delayed, there was poor attendance from the most senior civil servants, unlike the similar event for RPP2, which attracted almost every Director General.

The complexity of getting the TIMES model up and running meant that the original intention of including a sophisticated transport modeling component was not delivered. This would have been able to choose to substitute car journeys with other more sustainable transport choices. Instead Transport Scotland used their own model, with the starting assumption that there would be nearly 25% more car km driven in 2035 than today, and no increase in the use of buses. TIMES was only able to suggest making these vehicles electric rather than seeking alternatives to the level of traffic envisaged. Transport is the largest-emitting sector of the economy and leaving the choice of policy options almost entirely to the road-building, car enthusiasts in Transport Scotland is a key weakness of the CCP process.

Also in transport, much reference is made to the report commissioned from Element Energy on technological solutions to transport's climate emissions. It has been referred to in meetings and is mentioned a number of times in the CCP. It has been said to be being 'published soon' for a number of months now.

The CCP is logically structured but in some areas oddly lacking in detail of how a particular policy outcome will be delivered. For instance there are no policy outcomes listed in the tables for agriculture beyond 2025. While the Plan cannot be expected to have all the answers, there are many areas where how to deliver outcomes is left to a future discussion, e.g. table 8-7.

## Overall ambition of Climate Change Plan

On the one hand the ambition of the CCP must be exactly what is needed, since it is designed to add up to delivering the climate targets agreed by the Scottish Parliament last October. On the other hand, there is insufficient numerical detail to be sure that it does add up, in some sectors there is a large question over how and whether the proposed policy outcomes will be delivered and in a number of

areas, particularly transport, technical fixes are supposed to save us and so more difficult policies, are not discussed.

The 2009 Act required Scotland's emissions to reduce by at least 3% every year from 2020. The table below (and graphs in the Appendix) show that the highest-emissions sectors - transport, agriculture and industry - have been and are proposed to continue to be the sectors which make the least fair contribution to these percentage reductions. It is no coincidence that these are politically 'difficult' sectors. It is in these high-emission sectors that the credibility of the plan is most important and it is in these sectors that further reductions should be sought.

Sector	2014 emissions	Annual ave change 1990-2014	Annual ave change 2014-2032
Transport	12.9	-0.1%	-1.3%
Agriculture	10.7	-1.0%	-1.4%
Industry	10.4	-2.0%	-0.8%
Electricity	9.8	-1.3%	-4.5%
Residential	5.9	-1.0%	-3.0%
Services	3.4	0.5%	-3.9%
Waste	2.2	-3.1%	-3.1%

*Achieved and predicted annual reductions by sector, highest-emissions sectors first; figures in red are less than the 3% overall target required across all sectors*

There were several discussions with civil servants about replicating the RPP2 approach of listing the carbon reductions associated with each individual proposal and policies. Whilst these numbers were often quite approximate in RPP2 the TIMES model will have produced very precise estimates of the impact of each policy in each year - these figures exist; we are just not being told what they are. It is hard to see how anyone can have certainty that the document adds up to meeting the targets when this information is lacking. Similarly, it is hard to see how progress on the plan will be properly measured when it is not clear how much any given policy was supposed to have delivered by a certain date.

Even where technical fix measures are desirable and necessary the proposals look weak in terms of international comparisons. For instance, the Plan envisages that 40% of all new cars will be ultra-low emissions by 2032. Belgium, the Netherlands, Germany and Norway are all discussing or committed to targets of 100% by 2025 or 2030. In another example, a previous SNP transport minister promised that every rail line in Scotland would be electrified; at the rate suggested in the transport chapter this would take until 2140.

### **Climate change governance**

The Plan contains a chapter on monitoring and evaluation with sensible principles and aspirations, with a final monitoring framework due in 2018. Because of the lack of specific carbon abatement numbers attached to each proposal and policy, as mentioned above, the framework proposes to measure a range of outcomes, outputs and indicators, and report annually. It is not clear what status this report will have, nor when it will appear in relation to the annual targets figures, the 2009 Act §33 annual report to Parliament or the financial budget cycle. There is no commitment for a statement to Parliament and it may be up to Committees to make the most of this information.

It is not possible to tell from the CCP when and how much expenditure is required to deliver policies. So the predecessor Committee's criticism that it is not possible to work out whether the annual financial budget includes the funding needed to deliver on climate policies has not been addressed.

There is a new governance body proposed but no detail of who will sit on it nor what public scrutiny it will be open to. It is not clear that the Cabinet Sub-Committee on Climate Change will continue to exist.

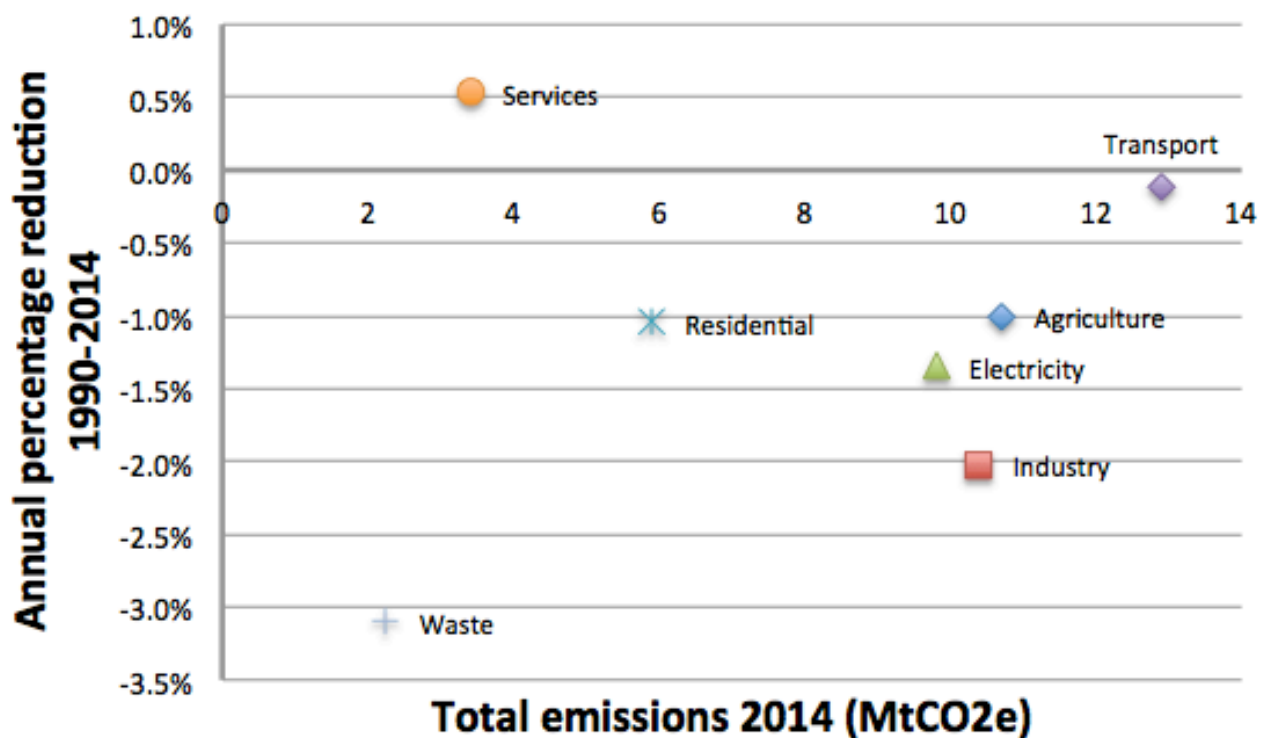
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## Appendix

### Actual annual sectoral reductions 1990-2014 vs total emissions



### Predicted annual sectoral reductions 2014-2032 vs total emissions

