



Draft Climate Change Plan

Environment, Climate Change and Land Reform Committee Debate, 16 March 2017

15 March 2017

The draft Climate Change Plan offers many encouraging glimpses of the healthier, fairer, greener Scotland we could be living in in 15 years' time. However, as the reports of the four Committees that scrutinised the draft make clear, improvements in a number of areas are needed to make the Plan a truly credible routemap to that low-carbon Scotland.

We endorse and recommend the [briefing issued by the Stop Climate Chaos Scotland coalition](#)¹, of which we are a member. Here, we provide more detail on three areas of particular concern to Friends of the Earth Scotland.

The TIMES model is the right choice, but needs improvement

The Draft Climate Change Plan is the first to be produced using TIMES, a mathematical framework used to model future greenhouse gas emissions from each sector of the economy. This is a significant improvement on the approach used for RPP1 and 2, and the TIMES model has been helpful in exploring options and highlighting which sectors need to do more. The Scottish Government was right to use TIMES, and should continue to develop and improve it for use in future climate change planning.

Transparency of inputs, constraints, and policy-by-policy abatement figures

The main deficiency in the TIMES model as it stands is the lack of transparency, which the Committees have noted has made it difficult for them to properly scrutinise the figures underlying the draft Climate Change Plan². The inputs, constraints and assumptions that were fed into the TIMES model have not been made public, and this information should be published.

Perhaps most significantly, unlike in RPP1 and 2, the Plan does not quantify the emissions reduction predicted as a result of each proposal, policy or policy outcome. There is an abatement figure for each sector, and as the Environment, Climate Change and Land Reform Committee (ECCLR) notes, "*it would be sensible to assume the policies and proposals in each sector had figures attached in order to add up to the totals suggested.*"³ However, the Scottish Government have said that these figures do not exist. It is not clear how they have produced sectoral totals without these figures, nor is it clear whether this information "cannot be quantified or just has not yet been quantified."⁴

The absence of these figures makes it impossible to know whether the policies and proposals set out in the Plan are sufficient to reach the emissions reductions required. In the future, it will make it impossible to tell if a policy is on track to deliver what is expected of it, and to take appropriate action if not. The ECCLR conclusion that "*each policy outcome, policy and proposal should contain information on the emissions reductions in MtCO₂e they are expected to achieve*"⁵ is one of the most important for ensuring the credibility of our national Climate Change Plan.

TIMES still needs a built-in transport model

A second major gap in the TIMES model is the lack of a built-in transport component. It was the Scottish Government's original intention that TIMES should incorporate its own transport model, but due to time constraints this part of the project was shelved. Instead, the Transport Scotland model feeds traffic and transport predictions in to TIMES. This allows far less sophisticated and accurate policy analysis than might be hoped for from a bespoke TIMES transport model, so the Scottish Government should recommit to fulfilling their original ambition for this as soon as possible.

¹ Stop Climate Chaos Scotland, *Briefing for Parliament Debate on Draft Climate Change Plan*. <http://www.stopclimatechaos.org/sccs-policy>

² e.g. Environment, Climate Change and Land Reform Committee, *3rd Report, 2017 (Session 5): Report on the Draft Climate Change Plan - the Draft Third Report on Policies and Proposals 2017-2032*, paragraph 5.

³ Environment, Climate Change and Land Reform Committee, *Report on the Draft Climate Change Plan*, paragraph 247.

⁴ Environment, Climate Change and Land Reform Committee, *Report on the Draft Climate Change Plan*, paragraph 252.

⁵ Environment, Climate Change and Land Reform Committee, *Report on the Draft Climate Change Plan*, paragraph 255.

Transport demand predictions are unreliable and unambitious

Questions over the accuracy and status of vehicle traffic projections

The Transport Scotland figures predict an increase of annual vehicle mileage of over 25% between 2015 and 2035 (specifically, 27% for cars, 26% for vans and 25% for trucks)⁶. These numbers are simply not credible. When the Scottish Executive published its 2006 transport strategy it predicted that traffic levels would grow by 22% between 2005 and 2015. The actual growth in traffic levels was 5% between 2005 and 2014. A similar prediction of 27% growth between 2001 and 2021 made in 2002 will no doubt prove equally wide of the mark.

Whether the Scottish Government expects the Transport Scotland projection to be borne out in reality is unclear. The Cabinet Secretary for the Environment, Climate Change and Land Reform suggested in her evidence that demand was unlikely to respond to policy intervention, saying “*transport demand is pretty much shaped by the operation of the economy.*”⁷ On the other hand, the Minister for Transport and Islands told his Committee that the Transport Scotland figure is “*the expected demand growth if we sit on our hands and do nothing at all.*”⁸

The Climate Plan should reduce transport demand, not just predict it

Despite the Transport Minister’s confidence that the dire prediction for traffic growth will be mitigated, there is no goal for that in the draft Plan; nor are there significant policies to quantifiably reduce demand or promote modal shift. Transport Scotland anticipates no increase in bus usage over the period to 2035, and does not include projections for rail, walking or cycling at all, suggesting these modes were given little thought.

The transport chapter of the Climate Change Plan should be overhauled so as to commit to, and set out the policies to deliver, quantified reductions in traffic mileage. There are no shortage of options to achieve this, including but not limited to: investing in walking, cycling and public transport infrastructure, empowering local authorities to introduce parking levies and effective Low Emission Zones, re-regulating buses to increase democratic control over routes and fares, and cancelling capital investment choices which will generate increased traffic.

Industry needs a plan beyond the EU Emissions Trading Scheme

Rather than an actual strategy to curb emissions from Scotland’s largest industrial plants, the draft Plan relies heavily upon the EU Emissions Trading Scheme (EU ETS) to deliver theoretical emissions reductions in the industry sector. Two events early in the lifetime of the Plan make this reliance problematic. When the UK leaves the European Union early in 2019 it is very unlikely that we will continue to be part of the EU ETS. It is widely anticipated (and supported) that the new Climate Change Bill, due to be introduced in the coming months, will change the accounting system for our national targets from the “net Scottish emissions account,” which includes EU ETS credits, to “gross territorial emissions”, which do not. Therefore, after the new Bill takes effect, it would be completely untenable for the industry sector to continue reporting EU ETS adjusted emissions while every other sector reports their really emissions.

It would be sensible to take advantage of the fact that we have prior notice of these two considerations, and use the current Climate Change Plan to begin adapting policy in the industry sector to take them into account. The final Plan should incorporate some contingency planning for managing industry sector emissions when the EU ETS is either no longer available or no longer relevant to Scottish climate change law.

⁶ Transport Scotland, *Greenhouse Gas Emissions Reduction Potential in the Scottish Transport Sector From Recent Advances in Transport Fuels and Fuel Technologies*, section 3.1.

⁷ Environment, Climate Change and Land Reform Committee, *Official Report*, 21 February 2017.

⁸ Rural Economy and Connectivity Committee, *Official Report*, 22 February 2017.