

DEVELOPING AN ENVIRONMENT STRATEGY FOR SCOTLAND: Discussion Paper

Response from Friends of the Earth Scotland - August 2018

Introduction

Friends of the Earth Scotland welcomes the opportunity to respond to this discussion paper on Developing an Environment Strategy for Scotland. We answer the three consultation questions below. Under the first answer we also make general comments on the aspiration and ambition of the discussion paper.

We have also contributed to and support the response submitted by Scottish Environment LINK.

About Friends of the Earth Scotland

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We work in Scotland for socially just solutions to environmental problems and to create a green economy; we campaign to end the degradation of our environment and to create a society which cherishes and protects the natural world on which we depend; we think globally and act locally, enabling people to take individual and collective action. We are part of Friends of the Earth International - the world's largest grassroots environmental network, uniting 75 national member groups, over 2 million members and 5,000 local activist groups around the world. We are an independent Scottish charity with a network of thousands of supporters, and 10 active local groups across Scotland. Friends of the Earth Scotland's vision is of a world where everyone can enjoy a healthy environment without exceeding their fair share of the planet's resources, now and in the future.

1. What are your views on the following draft vision for Scotland's environment and climate change policies?

Our draft vision is for "one planet prosperity". This means protecting nature and living within the Earth's sustainable limits, while building a more prosperous, innovative and successful nation.

The draft vision statement flows from the language of the first part of the discussion paper so we start with some comment on that text.

The discussion paper says that a new Environment Strategy will "provide a strategic statement of the ambition and high-level outcomes that [existing strategies] work collectively to deliver." While it is useful to summarise what other strategies will do for the environment, an Environment Strategy should be an actual strategy not a catalogue of environment-related commitments across government. It should work the other way around – the Environment Strategy should set out our strategic priorities and targets for the environment, which then influence and set a framework for the other strategies of government.

We welcome the balance between economic, social and environmental considerations which runs through the text, also the acknowledgement that landscapes and nature "are precious in their own right" and the ambition to "lead global action to address current and future environmental challenges."

There is some excellent language on the scale of the climate/resources challenge including references to Scotland's resource use requiring "more than three planets," aiming to be "within planetary limits" and to "reduce Scotland's international ecological footprint," as well as an ambition to be part of "a world where no country uses more resources than the Earth can support and [replenishes] the natural systems that sustain us." We also welcome the acknowledgement that there is a "moral responsibility" of "driving the transition to a low-carbon resource efficient economy."

However, we note that the central purpose of the Scottish Government as described in the National Performance Framework "to focus on creating a more successful country with opportunities for all of Scotland to flourish through increased wellbeing, and sustainable and inclusive economic growth" is at odds with these aims. At this point in time, with resource and ecosystem collapse rapidly approaching, continued economic *growth* is by its very nature not sustainable, and simply not possible within planetary limits unless it is at the expense of other nations prosperity and wellbeing (as much of our

historical growth has been). It is critical therefore, that the welcome development of an Environment Strategy for Scotland goes beyond summarising existing commitments, sets realistic goals within the context of planetary limits that ultimately lead to change across all portfolios, and a revised central purpose of sustainable development – that is development within environmental and social limits.

We very much welcome the theme of “protecting, maintaining and enhancing EU environmental standards” and the commitment to the four EU environmental principles, and to consult on environment governance. It is welcome that the discussion paper points to possible legislative approaches on this front, and we consider it essential that the 4 principles are enshrined in legislation. In relation to these themes we also support the Scottish Government’s priority to expand Scotland’s devolved powers and to maintain funding for environmental outcomes at least at current levels. We strongly believe the establishment of a specialist environmental court or tribunal is the best way to address environmental governance in relation to both Brexit and compliance with the Aarhus Convention. Further, the strategy should be developed in the context of the emerging UN framework principles on the right to a healthy and safe environment.

As the paper suggests Scotland did indeed take an early lead on climate targets, has been praised for its thinking on the circular economy and has proposed to ban fracking. The early commitment to contributing to the UN Sustainable Development Goals was also very commendable. But some of the good aspiration and fine words in the paper are overshadowed by under delivery or contradiction in a number of areas:

- the implication that the proposed targets in the Climate Bill are an adequate response to the Paris Agreement is not true, since they require Scotland to do almost nothing more than the current 2009 Act for the next decade. Friends of the Earth Scotland supports the Stop Climate Chaos Scotland call for a target of at least 77% reduction by 2030 and also calls for a target of net-zero emissions by 2040 at the latest.
- the paper notes that the Cleaner Air for Scotland strategy “sets out how we will reduce air pollution to protect human health and fulfil EU legal commitments by 2020” but it is quite clear that we will fail to meet that target, despite the new commitment to Low Emission Zones.
- the circular economy strategy and related international accolades, followed by more recent activity on plastic waste and the proposed Deposit Return System, are welcome but we still await a timetable and indication of content for the promised Circular Economy Bill.
- continued support for North Sea oil and gas development in the new Energy Strategy, including continued exploration, despite the fact that over 80% of known fossil fuel reserves are unburnable if we want to limit warming to ‘well below’ 2°C. A rapid and just transition away from our economic and structural dependence on fossil fuels is essential to achieving the aim of meeting climate targets and living within planetary limits.

The draft vision

We welcome the inclusion of ecological footprint messaging through the use of ‘one planet’ in the draft vision. However, ‘prosperity’ ties the vision too much to the economic frame of reference. The concept of One Planet Prosperity works reasonably well for SEPA, since a large part of their operation is in regulating businesses, but it is too limited an aim for a whole nation.

Broader alternative vision titles include *One Planet Scotland*, *One Planet Nation* or *One Planet Society*, all of which encompass the economy without letting it dominate.

The second sentence of the draft vision would be more consistent with the NPF and the National Outcomes if it mentioned fairness or inclusivity, also part of the Sustainable Development Goals. Given that ‘prosperity’ is part of ‘success’ and ‘innovative’ seems not to flow from anything else in the document an alternative formulation would be:

“This means protecting nature and living within the Earth’s sustainable limits, while building a fairer and more successful nation.”

2. What are your views on the following draft outcomes that will help to achieve this vision?

1. *We are a climate leader and play our full role in limiting global temperature rise to well below 2°C.*
2. *We are a zero waste, resource efficient nation.*
3. *Our biodiversity is protected and enhanced, supporting healthy ecosystems.*
4. *Our air, freshwater, seas and soils are of excellent quality.*
5. *Everyone can access, enjoy and connect with nature.*
6. *The global footprint of our consumption and production is sustainable.*

Defining outcomes is useful and in general this is a good draft set. To actually drive action these high-level, long-term outcome aspirations would need to be supported by near-term, specific milestones or targets.

The first outcome, on climate leadership, needs to reflect the ambition of the Paris Agreement, and Scottish Government commitments, to pursuing efforts to limit global warming to 1.5°C.

It is important that the second outcome mentions the circular economy, perhaps like this:
"We are a zero waste, resource efficient nation with a circular economy for resources."

In the sixth outcome, the word "sustainable" is now much misunderstood and misused, so a better formulation might be "within environmental and social limits."

3. What are your views on the draft knowledge accounts which will be used to help identify priorities for action in the coming years? What additional sources of key evidence can you add?

The knowledge accounts could be a useful way of presenting information for different environmental themes, although the air quality one is disgracefully complacent and incomplete. Although the paper is correct in saying that extensive climate and marine information is already available in other formats it would still be useful to have them presented in the knowledge account format. 'Knowledge account' is a terrible name, since it is not at all clear what it means to the lay person from the name. Please think of something more comprehensible.

Specific comments on some of the draft knowledge accounts:

air pollution – the "where are we now" box is full of complacent statements about how industrial pollution has reduced, rather than spelling out the current wide-spread urban pollution problem. In particular it does not acknowledge that there are 38 Air Quality Management Areas – where EU pollution standards are not met - in 14 local authorities in Scotland. Section B in the text version is only slightly better. As the discussion paper notes, the Cleaner Air for Scotland strategy "sets out how we will reduce air pollution to protect human health and fulfil EU legal commitments by 2020" but, quite remarkably, this commitment is not mentioned in the knowledge account, nor is the fact that we will definitely not meet it.

business resource efficiency – generally well framed but needs to spell out more clearly a vision of what moving to a circular economy means in this sector and needs more emphasis on reducing consumption. Not clear what point the statement at the end of para A1 about GDP growth is trying to make about resource use.

household resource efficiency – again generally well framed but needs to spell out more clearly a vision of what moving to a circular economy means in this sector and needs more emphasis on reducing consumption. Under product design it would be useful to mention design for longevity as well as design for recycling/recovery. It would be useful to stress that, while household waste makes up only a quarter of the total waste stream, it is the most visible to ordinary people so changes in practice can have a strong impact on overall public attitudes to resource use. There are words missing at the bottom of the 'Key evidence gaps box.'