

# Climate Change Plan Update Must Deliver Transformational Change

*Friends of the Earth Scotland proposals*

*October 2020*



The 2018 special report from the UN's Intergovernmental Panel on Climate Change illustrates the huge impacts of increased warming, which will be disproportionately felt by "disadvantaged and vulnerable populations", if strong action to limit warming to 1.5° isn't taken now.<sup>1</sup> In response to this growing recognition, and the 2015 Paris Agreement, the Scottish Parliament passed a new Climate Change Act, setting targets to reach 'net-zero' emissions by 2045, and reduce emissions by 75% by 2030.

It has now been a year since the Scottish Parliament passed this Act, with a commitment from the Scottish Government to lay an update of the Climate Change Plan within six months of Royal Assent. While it is understandable that the Climate Change Plan update was postponed earlier this year due to coronavirus, we must recognise that even before the pandemic, we were not on track to meet these new targets. Urgent and transformational action is required in this Plan to set Scotland on track to meet the targets and also deliver a green recovery.

## The update to the Climate Change Plan should:

1. **Set out new and transformative policies across all sectors** which enable a **rapid reduction in emissions in line with the new 2030 target** and which sets Scotland on course to **deliver a just transition to a fairer, zero-carbon economy centred on wellbeing**.
2. **Provide detailed policies to allow progress monitoring** and assessment of impact towards targets. It must have **measurable outcomes, clear timelines and abatement figures** and, as laid out in the new Act, **set out an estimate of the costs and benefits associated with the policies in the plan**.
3. **Deliver on all elements in section 35 of the 2019 Climate Change Act** (which sets out the contents for a Climate Change Plan) including how it takes account of the climate justice and Just Transition principles in the Act. A commitment to **Just Transition and climate justice requires at least an understanding of the expected impacts of proposed policies as well as targeted support. The plan must include these considerations to ensure it will not negatively impact the delivery of either. The plan must:**
  - Explain how the proposals and policies set out in the plan are expected to affect different sectors of the Scottish economy and different regions in Scotland, including how they are expected to affect employment in those sectors and regions.
  - Support the people who are most affected by climate change but who have done the least to cause it and are the least equipped to adapt to its effects, and help to address inequality.
  - Set out the extent to which it takes account of the just transition principles and explain how the implementation of the plan is expected to contribute to the achievement of sustainable development, including the achievement of the United Nations sustainable development goals.
4. **Not rely on negative emission technologies, including Carbon Carbon Capture Storage (CCS), Bioenergy Carbon Capture and Storage (BECCS) or Direct Air Capture (DACS).**

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<sup>1</sup> [IPCC - Special Report - Global Warming of 1.5c](#)

**CCS, BECCS and DACS are unproven technologies which would take years to develop,** and have not been demonstrated at the scale required, and which continue to support the extraction and burning of fossil fuels. Focus should be on the positive opportunities for decarbonisation and creating good new green jobs through **investment in energy efficiency, renewables and electrification, rather than investing public money into technologies that may never work and risk us missing targets** by putting off urgent action that needs to be taken today.

**Blue Hydrogen** (from North Sea gas) **should not be developed or relied upon** to decrease emissions due to its reliance on fossil fuels and unproven CCS. The **priority for renewable electricity** in the first instance **should be for 100% of all electricity generated in Scotland to come from renewables. The top priority for this electricity should be for direct use rather than for making renewable hydrogen.**

5. **Address sectors where there has been very little progress to date** and outline greater investment and regulatory intervention from the Government in those sectors where emissions remain high, including **transport and buildings.**

Below we set out policy priorities in transport, building, waste and Just Transition.

### **Transport**

Over a period of approximately 30 years the Scottish government has failed to meaningfully cut emissions in the transport sector with an emissions decrease of less than 5% between 1990 and 2018. As the **biggest sectoral emitter** - contributing 37% of overall emissions in 2018 - **urgent action must be taken to decarbonise transport which shifts spending away from high-carbon infrastructure** and into sustainable transport options. This should include supporting a long-term goal of spending 10% of the transport budget on active travel, as well as:

#### **No new trunk road and motorway building schemes should be funded**

£749 million has been allocated by the Scottish Government to the creation of motorways and trunk roads for 2020/21 which is unnecessary high-carbon infrastructure. This is particularly worrying as we know that any expansion in road capacity only leads to an increase in the number of cars on the road, at a time when we should be looking to decrease journeys taken by private car.

#### **Support the expansion of public ownership of buses**

The Scottish Government should create a fund for local authorities wanting to bring buses into public ownership. New municipal bus companies would ensure all future public investment stays in the system, profits are reinvested, the network is better integrated and prioritises passengers not profit. A number of councils have expressed an interest in using the powers in the Transport (Scotland) Act 2019, but support must be in place to overcome initial barriers to doing this.

#### **Support Universal free bus travel**

Alongside changes in the ownership and governance of our bus system, we should be moving towards universal free bus travel. Moves to make bus travel free for Under 19s, and possibly for Under 26s, are very welcome. This should be continued until all age groups can travel for free. This policy is more efficient in tandem with an expansion of public ownership, to avoid significant handouts for private companies, while they continue presiding over an insufficient and patchy network.

### **Increase Air Passenger Duty**

While public subsidy for high-polluting transport like aviation needs to be managed downwards, our surface transport - specifically, buses, trains and ferries - need investment to be rapidly decarbonised. APD should be raised, with revenues invested in sustainable transport infrastructure.

### **Introduce scrappage schemes that replace cars with access to sustainable transport**

Instead of offering part of the cost of a new car - while we need to reduce car use and car dominance - schemes should offer to cover the full cost of car club membership, public transport season tickets or electric bikes. Not only would this scheme contribute to our climate targets, but it would also prioritise public health, be able to offer targeted support to people on lower incomes and create demand for jobs in sustainable transport. A small version of such a scheme has recently been rolled out around Low Emission Zones, but this should be built on so everyone in Scotland has access to such incentives.

### **Buildings**

Faster action must be taken to decarbonise the buildings sector with the updates to the Climate Change Plan needing to provide stronger and more detailed policies with set targets that allow for progress monitoring on energy efficiency and heat. Between 2017 and 2018 there was an increase in residential emissions<sup>2</sup> attributed to an increased use in heating and Scotland is currently set to miss its 2020 target of 11% of non-electric heat from renewable sources and is nowhere near low-carbon heat levels consistent with Net Zero<sup>3</sup>. The refreshed plan must:

#### **Rapidly transition away from fossil-fuelled heating**

Phasing out high-carbon heating like oil and LPG in off-gas grid areas by 2025 and setting a date for the phase out of gas boilers in existing homes on the gas grid.

#### **Commit to doubling investment in energy efficiency**

Rapidly upscale existing schemes and revising building standards so **all new buildings meet the highest energy efficiency standards such as Passivhaus, its equivalent, or better from 2021** along with supporting regulations to require retrofit to meet high efficiency standards at point of sale or major refurbishment, for owner occupiers from 2024, and increased standards for the rented sectors.

#### **Prioritise genuinely renewable heat solutions**

The plan should **not rely on inefficient and fossil fuel reliant hydrogen in heating**. Priority should be on **investing in the electrification of heat, widespread adoption of heat pumps and heat networks**, making homes easier to heat and supporting the eradication of fuel poverty.

### **Waste**

The current (last) Climate Change Plan fails to set out clear and measurable policies in the waste sector, a lack of progress has been made since the publication of the plan in May 2018 and targets have not been met. Moving to a circular economy would save Scotland 11 million tonnes of carbon dioxide emissions by 2050 - a quarter of our current total - the updates to the plan must map **out a credible route with set timelines that enable a reduction in overall waste which:**

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<sup>2</sup><https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2020/06/scottish-greenhouse-gas-emissions-2018/documents/scottish-greenhouse-gas-emissions-2018/scottish-greenhouse-gas-emissions-2018/govscot%3Adocument/scottish-greenhouse-gas-emissions-2018.pdf>

<sup>3</sup><https://d423d1558e1d71897434.b-cdn.net/wp-content/uploads/2020/10/Reducing-emissions-in-Scotland-Progress-Report-to-Parliament-FINAL.pdf>

### **Commit to as much as possible of the materials flowing through the economy being being recyclable or reusable materials**

Introduce policies that deliver a reduction in waste, and an increase in reuse, to meet our targets to end landfilling of biodegradable municipal waste by January 2025 and reduce the percentage of all waste sent to landfill to 5% by 2025.

### **Develop data collection and strategy for sustainable use of biomass in materials**

Developing a strategy for the sustainable use of biomass to ensure that increased demands for biomass do not result in habitat destruction and biodiversity loss.

### **A moratorium on the building of new incinerators in Scotland**

Any new incinerators will lock Scotland into years of wasting resources by burning them, increased carbon emissions and associated environmental damage, at a time when we should be embracing opportunities to reuse and recycle raw materials. Overall the drift to higher levels of incineration is in conflict with our climate change and broader environmental ambitions. Scotland needs a moratorium on the building of new incinerators..

### **Targets to reduce food waste by 50% from 2013 baseline by 2032**

Since the Climate Change Plan is due to run until 2032, the revised plan should include a new target for food waste post 2025. In order to continue to reduce food waste across Scotland, a new target to reduce food waste by 50% from the 2013 baseline by 2032 should be applied.

## **Electricity**

### **Scotland should be aiming for 100% renewable electricity generation by 2030**

Priority in the first instance should be on increasing generation of renewable electricity, rather than directing renewable electricity to make hydrogen. The current energy strategy aims for a 'largely decarbonised' electricity system by the end of the plan period but still has emissions of 2MTCO<sub>2e</sub> from the sector by 2032. Meeting the new 2030 climate target of 75% will require extra effort across all sectors, and completely decarbonising electricity generation in Scotland would eliminate this final 2MT.

### **Give the publicly owned energy company powers to generate renewable energy from the day it comes into operation**

An expansive publicly owned energy company (POEC) can have a transformational impact and should be central to economic recovery measures that must be at the core of the update, given its potential to address environmental and social objectives simultaneously. A POEC could drive renewable energy generation at a national and local level while prioritising domestic supply chains and decent work that is aligned with Fair Work principles.

### **Introduce a ban on new fossil fuel infrastructure including carbon capture storage (CCS) and fossil-generated hydrogen (blue hydrogen)**

Any fossil fuel infrastructure now developed will be operational long after we should have completed our energy transition. This would lock Scotland into high carbon emissions for decades to come, compromising our ability to meet our climate targets. Focus should be on the positive opportunities for decarbonisation and creating good new green jobs through investment in renewables and decarbonisation across sectors rather than investing public money in oil and gas infrastructure which includes CCS and fossil hydrogen.

## **Just Transition**

Planning the transformation of polluting industries alongside building decent work and a fairer green economy is a significant challenge - and our window of opportunity is closing. While the concept of Just Transition has climbed the political agenda, the onus is now on turning Just Transition principles and advice into transformative plans for our economy. The updates should:

### **Provide a framework for the creation of a national Just Transition Action plan**

This must take into account wellbeing and a more circular economy, and should pave the way for an action plan to include regional and sectoral plans with targets and timescales for reducing emissions, increasing investment and job creation across all sectors.

### **Assess and fill the Just Transition gap**

The government must assess the investment gap for transition and create or ensure sufficient funding for the investments needed for a Just Transition.

### **Plan for engagement of those most affected**

Identifying those groups which are likely to be affected by the move to a low-carbon economy and create opportunities for their voices to shape the planning and delivery of Just Transition programmes.

### **Support and invest in skills and training programmes**

A detailed assessment of the existing Just Transition skills and investment gap which identifies the urgent needs for clean energy sectors and allocates finance and support from the Government and its agencies to address them is required.

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