

## Environment, Climate Change and Land Reform Committee

### Inquiry into air quality in Scotland

#### Written submission from Stop Climate Chaos Scotland

*Stop Climate Chaos Scotland (SCCS) is a civil society coalition campaigning for action on climate change. Members include environment and international development organisations, student unions and trade unions, community groups and faith groups. We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of the Paris Agreement<sup>1</sup> and supporting climate justice around the world. We welcome the opportunity to respond to the call for views for the Environment, Climate Change and Land Reform Committee inquiry into air quality in Scotland.*

#### **Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?**

No, Scotland does not have the right policies in place to tackle air pollution. This is despite the Cleaner Air for Scotland<sup>2</sup> document of 2015 and the High Court judgement which has challenged the adequacy of the UK response to the EU Directive.

Toxic, illegal air pollution is a public health emergency and requires much more urgent and ambitious action than the Scottish Government's current approach. Air pollution from the transport sector is a major contributor to health problems including heart conditions, lung disease and cancer. Action to reduce this is a triple win for health, climate change and air quality.

#### **Are the policies sufficiently ambitious?**

Air pollution from transport is an area that the SCCS coalition has identified as a priority, as addressing it will also tackle climate change. Transport is now the single biggest source of greenhouse gas (ghg) emissions in Scotland, accounting for 27.4% of total emissions<sup>3</sup>. It is also the sector that has made least progress in cutting emissions over the last three decades. We have long highlighted that the Scottish Government has not done enough to put in place strategies and policy proposals to sufficiently transform the transport sector, but also frequently takes policy decisions that are directly contradicting stated climate ambitions, for example, the cut to Air Departure Tax<sup>4</sup>.

The most effective measure to cut air pollution has been shown, by UK Government research<sup>5</sup>, to be the charging or banning of dirty vehicles entering city and town centres. The research shows Low Emission Zones (LEZs) are 60 times more effective than a scrappage scheme. They are also acknowledged to be the quickest and most cost-effective way to tackle the problem.

SCCS wants to see an increase in spending on active travel to 10% of the transport budget, facilitating a modal shift to walking and cycling. This transformation would help cut obesity levels, improve mental as well as physical health, and, of course, would help improve air

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<sup>1</sup> <http://www.stopclimatechaos.org/news/2017/06/06/joint-statement-paris-agreement>

<sup>2</sup> <http://www.gov.scot/Resource/0048/00488493.pdf>

<sup>3</sup> <http://www.gov.scot/Resource/0052/00520839.pdf>

<sup>4</sup> [http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/ADT\\_Bill\\_Stage3\\_debate-briefing\\_from\\_SCCS%26TransformScotland.2017.06.20.pdf](http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/ADT_Bill_Stage3_debate-briefing_from_SCCS%26TransformScotland.2017.06.20.pdf)

<sup>5</sup> [https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting\\_documents/Technical\\_Report\\_Amended\\_9\\_May\\_2017.pdf](https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Technical_Report_Amended_9_May_2017.pdf)

quality for all. We make the case for this in a number of our recent submissions and responses, including for the consultation on the draft Energy Strategy<sup>6</sup> and in our briefing for the Scottish Parliament debate on the draft Climate Change Plan<sup>7</sup>. We will also soon be doing so in response to the consultation on the new Climate Change Bill.

SCCS has several key 'asks' for the new Climate Change Bill, one of which calls for the Scottish Parliament to commit to actions that cut emissions and deliver a cleaner, healthier, more prosperous Scotland, including:

- Cleaner transport – phase out the sale of new fossil fuel cars by 2030

We believe that phasing out the sale of new fossil fuel cars by 2030, along with measures such as Low Emission Zones, workplace parking levies (as part of fair green workplace/travel to work plans, negotiated with recognised trade unions), better public transport, active cycling and infrastructure for electric vehicles, would reduce emissions, tackle air pollution and improve public health.

### **Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?**

We understand that the Scottish Government is proposing only 1 LEZ within Scotland. We echo the call of Spokes (a member of SCCS) for funding and support for:

- 1) LEZs in each of the 3 Scottish Cities by 2018 (Edinburgh, Glasgow, Aberdeen) – all of which are keen to go ahead;
- 2) more LEZs in towns and cities across Scotland after 2018;
- 3) investment in active travel and public transport.

### **Is adequate consideration given to air pollution from agriculture?**

No. Agriculture is a significant source of air pollution in the form of ammonia, nitrous oxide (N<sub>2</sub>O) and methane (CH<sub>4</sub>). Scotland's agriculture and related land use now accounts for 22.4% of all Scotland's ghg emissions<sup>8</sup> - mainly from N<sub>2</sub>O and methane. Importantly, farming is the biggest emitter of methane and nitrous oxide (N<sub>2</sub>O) both powerful ghgs. Methane is mainly produced by cows & sheep (and landfill) and is 25 times more powerful than CO<sub>2</sub>; N<sub>2</sub>O is released when fertiliser breaks down in the soil (and from transport) and is 310 times more powerful than CO<sub>2</sub>. Ammonia is not a ghg but causes significant odour issues and damage to natural habitats through eutrophication. Ammonia levels have only decreased by 13% between 1990 and 2014<sup>9</sup>.

A key way to cut the ghg N<sub>2</sub>O is for all farmers to use nitrogen fertiliser more efficiently. It would also help to reduce ammonia pollution. Government has not introduced any significant emission reduction policies affecting the agriculture sector so far. The Farming for a Better Climate (FFBC) initiative is purely voluntary and focussed on advice, and climate related activities through Scotland's Rural Development Programme are limited in scope. The draft Climate Change Plan was the opportunity to introduce the most basic regulation, such as compulsory soil testing and carbon audits but, late in its development, Ministers decided

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[http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/SCCS\\_EnergyStrategy\\_consultation\\_response.May2017.pdf](http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/SCCS_EnergyStrategy_consultation_response.May2017.pdf)

<sup>7</sup>

[http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/SCCSBriefing\\_draftClimateChangePlan.March2017.pdf](http://www.stopclimatechaos.org/sites/www.stopclimatechaos.org/files/SCCSBriefing_draftClimateChangePlan.March2017.pdf)

<sup>8</sup> <http://www.gov.scot/Resource/0052/00520839.pdf>

<sup>9</sup> <http://www.gov.scot/Publications/2016/10/7565/334166>

against compulsory measures. Government policy is needed to set direction towards greener farming and reducing air pollution from agricultural activities, and to introduce the policies and mechanisms needed to make it happen.

In response to the current Climate Change Bill consultation SCCS is calling for Scottish Government to commit to actions that cut emissions and deliver a cleaner, healthier, more prosperous Scotland, including by promoting greener farming and setting a nitrogen budget for Scotland by 2020.

A Nitrogen Budget, or national account for nitrogen, aims to cut the overall amount of chemical fertiliser spread on Scotland's fields and promote recycling of biodegradable materials like food waste. It would firstly help Government better understand the amount and flows of nitrogen we use in all sectors of Scotland from fertiliser factory to fork, from field to food waste, from sewage treatment to seas. A Nitrogen Budget would help in developing fair policies which cut nitrous oxide emissions, ammonia and other nitrogen pollution, and promote recycling. It would help to identify where nitrogen-containing materials are lost or wasted, including as air pollution, and in developing mechanisms to recycle these, making a more circular economy for valuable biodegradable materials. Better understanding of nitrogen use and flows would give confidence to set national targets for reducing nitrogen imports and make us more self sufficient in growing our own food.

### **Are there conflicts in policies or barriers to successful delivery of the air quality objectives?**

A key barrier is reluctance of Scottish Government to address issues of behaviour change in both the transport and the agriculture sectors, either to require a change in the habits of drivers or the practices of farmers. These sectors have seen the low reductions in emissions since 1990 and have had few policies imposed. Government must show leadership to secure the many benefits, including for health and for wildlife, that can be achieved from imposing regulations to reduce harmful emissions from transport and from how land is used and managed.

A barrier to improving air quality from farming and other land use is the need for clear ownership by and within the Scottish Government. At present, improving air quality is not prioritised and where there are policies these are developed in silos by teams working on only part of the problem. Government needs to work differently and better if it is to address policies with a wide scope, such as a developing a Nitrogen Budget for Scotland.

For more information, please contact:

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