

Stop Climate Chaos Scotland

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Rt Hon Lord Deben Chairman UK Committee on Climate Change 7 Holbein Place London SW1W 8NR

14 December 2017

Dear Lord Deben,

I am writing on behalf of the members of Stop Climate Chaos Scotland to record a number of concerns ahead of the publication of the Committee's second set of advice to the Scottish Government on the forthcoming Climate Change Bill.

Early action to 2032

We have noted the Committee's decision to advise no increase in ambition over the current plans for at least 13 years, notwithstanding the Scottish Government's desire to implement more ambitious targets following the Paris Agreement. The decision appears to accept a high risk of Scotland failing to deliver on that ambition.

The Committee advised in March 2016 that its High Ambition Scenario for 2032 is 'not an upper bound'. In light of the recent Programme for Government announcements to increase ambition on transport, and the subsequent rebalancing of effort advised by the CCC for the final Climate Change Plan, we believe the Committee should revisit its advice on 2030. The aim should be to reduce overall cumulative emissions which, in this instance, is already technically feasible.

Likelihood of hitting Paris goals

The aim of the Paris Agreement is to hold the increase in global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit the increase to 1.5°C. Our view is that should mean that, at the very least, we will pursue a path that makes it *very likely* that well below 2°C will be achieved.

It is not clear what risk of breaching 2°C is built into the Committee's most recent advice on the Scottish Climate Change Bill. It notes that 'Scotland's current statutory target for 2050, for a reduction of at least 80% on 1990 emissions, is based on a global path that keeps central (i.e. 50% likelihood) estimates of global temperature rise close to 2°C'. Elsewhere, the Committee has issued advice based on achieving a 66% likelihood of restricting global temperature rise to 2°C.

In either case, a 50% or 66% likelihood of staying within the 2°C goal represents a risk of failure in excess of what can be reasonably be implied by the commitment to pursue efforts for 1.5°C. We would welcome the Committee providing a likelihood estimate for hitting 1.5°C and 2°C in its advice to Government.

Equity considerations and climate justice

Scotland has benefitted from a long history of carbon-intensive industrialization; it is blessed with significant renewable energy resources. That gives us a particular responsibility to reduce, then eliminate, climate emissions.

The Committee's advice envisages all countries having 'approximately equal per-capita emissions in 2050'. In our view that does not allow sufficient emissions space to developing countries with very significant economic and environmental challenges, including the emissions locked into necessary new infrastructure.

Technical feasibility

The Committee's advice shows that a fair contribution to a global effort to reach 1.5°C (assuming equal per capita emissions) would be an 89-97% reduction from 1990 levels by 2045 to 2050. Yet the Committee prioritises what is 'achievable' in justifying advice to aim for 80% or 90% rather than 97%. This implies a judgment by the Committee of the acceptable parameters of financial cost and political opinion. It requires a judgment as to the development of technology out to at least 2050. The assumptions underpinning these judgments by the Committee are not clear.

The Committee suggested, in its UK advice on Paris, that net zero may be possible with breakthrough reductions in hard-to-reduce sectors and if a range of further greenhouse gas removal technologies can be deployed. We would suggest that there is a weaker incentive to get action on these sectors and technologies if legislated targets do not necessitate such action.

Recommendations for future advice

We value hugely the work of the Committee. Its advice is vital in informing the development of Scotland's new Climate Change Bill and related policy. We would be grateful if the Committee would address the above concerns in its forthcoming advice.

The current path proposed to take us from stated Scottish Government objectives to the requisite action to achieve those objectives is, we believe, unsatisfactory. In our view the Scottish commitment to the Paris Agreement requires, based on the science and equity, *at minimum* an emissions reduction of 77% on 1990 Scottish levels by 2030, and net-zero emissions by 2050.

To record our reasoning on these matters, I will be copying this letter to the Scottish Government and, for transparency, will publish it on our website. We would welcome the opportunity to meet with you to discuss further the issues we have raised.

Yours sincerely,

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Tom Ballantine Chair of Stop Climate Chaos Scotland