



Stop Climate Chaos Scotland

Briefing on Scottish Government's response to RACCE Committee's RPP2 recommendations

August 2013

Introduction

The second Report on Proposals and Policies is an important document, setting out how Scotland will achieve its challenging climate change targets each year to 2027. It is a document that will last until a revision - RPP3 - is published in 2016. Stop Climate Chaos Scotland was encouraged by the level of engagement and scrutiny of the report by four Parliamentary Committees. However, as a broad civil society coalition, we were concerned that many of Committees' substantive concerns and recommendations were not adequately addressed in the final report.

In this document, we set out our views on the Scottish Government's response to RACCE Committee recommendations.

Broad governance issues

We agree with the committee that it would be helpful to ensure the committees are as well informed as possible before the formal 60 day scrutiny period begins, and that any associated and relevant documents are published alongside the draft RPP. This did not happen with the Behaviours Framework, which made scrutiny all the more difficult.

Parliamentary scrutiny of the RPP2 – and the ability for stakeholders to express their views to committees - is a crucial part of ensuring the delivery of the Scottish Climate Change Act. Without furnishing the Parliament with adequate information to enable informed scrutiny, and subsequently taking sufficient action to address concerns raised, there is a risk that that scrutiny becomes merely a matter of process.

In view of the two missed emissions targets, previous Scottish Climate Minister, Stewart Stevenson's comments in 2010 are pertinent:

"I cannot speak for future ministers of any political persuasion. However, I can be fairly confident that this committee and its successors will continue to hound and harry ministers in any Administration that does not live up to the aspirations to which we all agreed when we passed the Climate Change (Scotland) Act."

Stewart Stevenson MSP, then Climate Change Minister, speaking in 2010 to the predecessor Committee to RACCE ([TICC Committee](#))

Presentation and level of detail in RPP2

SCCS considers that concerns regarding the format and presentation of the document were largely addressed in the final report. In particular, it is useful that the final report includes percentage reductions by sector compared to 1990 as well as clarity over whether policies and proposals sit at an EU, UK or Scottish level. It is also very useful that further information on costs and benefits has been included in the final RPP2.

Monitoring and evaluation

The response states that the new Climate Change Delivery Board, formerly the Emissions Reduction Board, will have 'robust oversight' of the delivery of emissions reductions. However, transparency of this group is important and we note that the Scottish Government's [web pages about this Board](#) do not appear to have been updated since February 2013. We recommend there is more accountability and transparency about this group, so that it is enabled to provide this 'robust oversight' role.

We are encouraged that Scottish Government is also looking at a new monitoring system to evaluate and measure progress, and we encourage the Committee to keep a watching eye as these develop.

Effectiveness of RPP2

There has been very little change to the report in terms of providing greater assurance that all future emissions targets set under the Scottish Climate Change Act will be met. Given that the first two annual

emissions reduction targets have been missed, this is a major concern. We are disappointed that the missing of the targets did not lead to additional action, as required by section 36 of the Scottish Climate Change Act, to compensate for lost ground.

The Scottish Government response to this point offers no change or improvement to address this recommendation from the Committee, restating the same explanation offered during the scrutiny stage: ‘The Scottish Government acknowledges the points raised about the balance of proposals and policies in the RPP2 but would emphasise need for the RPP2 to incorporate flexibility’. An additional explanatory paragraph in the RPP2 is not the same as ‘setting out proposals and policies to compensate in future years for the excess emissions’ as stated in the legislation.

We are concerned by the language used by the Minister to Parliament on 27th June regarding the annual targets: “It is clear that the basis on which this Parliament set Scotland’s climate change targets has changed significantly over the past few years. That is something that the Scottish Government will keep under review.” Given that the science is unequivocal that in order to prevent the worst effects of climate change, emissions need to reduce dramatically as fast as possible, any language about reviewing targets is both unhelpful and unnecessary. This is particularly pertinent when there are so many policy levers the Government can still use, backed up with appropriate levels of funding in Scottish Budgets, in order to meet the targets.

EU ambition

This was a key recommendation from the RACCE Committee and was acknowledged by the Climate Change Minister in his RPP2 evidence session: “I recognise that if we do not have that [*EU move to 30% 2020 target*] in place, we will be in a more vulnerable position in terms of annual targets, so we need to reflect on that.” The final RPP2 does not set out a less vulnerable position in terms of annual emissions reduction targets.

SCCS does not consider that the Committee’s recommendation regarding reliance on the EU climate target is sufficiently addressed. The response from Government suggests that targets under the Scottish Climate Change Act have been set assuming the EU 2020 target increases to 30%. We would like to take this opportunity to stress that this is categorically not the case. The annual targets were set taking into account the advice from the CCC, which did not assume in their recommendations that the increase in EU ambition would take place¹.

It is deeply disappointing that the RACCE Committee’s recommendations in that regard have been ignored. RPP2 does not set out ‘how greater domestic reductions could be achieved within the current EU target’ as recommended by the Committee.

Technical innovation proposals and timescales

The additional detail set out with regard to further abatement potential (Homes and Communities on p124, Transport on p183 and Rural Land Use on p216 of RPP2) is welcome, though we remain concerned at the high levels of emissions abatement attributed to vague proposals far in the future rather than concrete actions in the shorter term.

We welcome the commitment to develop and refine the technical abatement proposals and set out more information in RPP3. This work must begin now in order to have more detail available for RPP3, or to even be able to bring in some of these proposals earlier. We encourage the Committee to keep a watching brief on the development of these proposals.

¹ The CCC advice stated that: ‘Scottish climate strategy should be based on aiming for a level of emissions reduction effort in the non-traded sector that is invariant to the EU framework’ (P 39 of CCC’s [Scotland’s Path to a Low Carbon Economy](#)); and ‘We therefore recommend that targets should reflect the bottom up approach (i.e. building in cost-effective abatement potential), with adjustment of the targets if a future EU and / or global deal requires deeper cuts.’ ([letter from CCC in 2011](#) regarding setting that batch of targets).

Behaviour change

Stop Climate Chaos intends to provide further briefing to the Committee on the Behaviours Framework and the ISM tool. However, in relation to the Committee's recommendation, we would point out that the third aspect of that recommendation regarding how that work will be 'informed, inspired, funded and delivered' has not been sufficiently addressed.

Looking forward

It is essential that the policies and proposals detailed in the report are developed and adequately funded and rolled out as described or earlier if possible. We welcome the announcement that additional money has been secured in the forthcoming Scottish Budget for funding of climate change measures. We hope the committee scrutiny of the Budget will build on the scrutiny of the RPP2. SCCS will continue to work with Parliament and Government to identify additional opportunities to secure emissions reductions.

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Stop Climate Chaos Scotland (SCCS) is a coalition of organisations campaigning on climate change, including environment, faith and development organisations, trade and student unions and community groups.

Stop Climate Chaos Scotland is a charity, registered in Scotland