



## Stop Climate Chaos Scotland

Response to Scottish Government's Climate Ready Scotland: Draft Scottish Climate Change Adaptation Programme  
September 2013

Stop Climate Chaos Scotland (SCCS) is a diverse coalition of 60 organisations in Scotland campaigning together on climate change. Our members include environment, faith and international development organisations, trade and student unions and community groups.

SCCS wants to see all relevant Government policies and strategies aim to reduce greenhouse gas emissions, directly or indirectly, and thereby contribute to achieving Scotland's annual emission reduction targets as set under the Climate Change (Scotland) Act 2009.

In addition to mitigation, Scotland must plan for a changing climate and adapt to the impacts which are being experienced now. SCCS does not work directly to influence adaptation policy but broadly supports the work of others such as Scottish Environment LINK.

### **We recommend that all policies and proposals included in the SAP aim to achieve the Programme Aim and Objectives through low-carbon means.**

We believe it is important that the Scottish Government avoids perverse outcomes whereby Scotland would become more resilient to climate change whilst at the same time increasing emissions and contributing to climate change. For example, we recommend that, where possible, increased flood risk due to climate change is managed as naturally as possible by using natural floodplains or by using habitats to protect vulnerable areas. The alternative is often a high-carbon approach, e.g. building ever higher flood defences.

We refer to LINK's 5 Principles and in particular the 5<sup>th</sup> Principle '*Adapt sustainably – to avoid maladaptation and detrimental impacts on other elements of the environment*' which includes ensuring policies do not increase emissions.

SCCS welcomes policies and strategies which aim to achieve multiple benefits and outcomes. We want to see more joined-up policies from Government which aim to maximise emissions reductions alongside other Government objectives.

We welcome a number of policies in the draft SAP which will help to reduce emissions in addition to meeting adaptation objectives. A large number of other SAP policies have the potential to reduce emissions in addition to meeting adaptation objectives.

We recommend that all policies and proposals are developed carefully to avoid actions which increase emissions. However, SCCS is not able to comment further on SAP policies because too many of the policies provide insufficient detail to be judged accurately. In most cases it is unclear what implementation may occur or what action the policy will deliver.

With respect to this, SCCS is particularly concerned that policies in the SAP aimed at increasing the resilience of high carbon sectors, such as transport and infrastructure projects, should not result in greater carbon emissions.

SCCS also recommends the inclusion in the SAP of Government's existing policy for peatland restoration. This policy has both climate mitigation and adaptation potential benefits.

For more information please contact:

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