

# **DEFRA consultation on the review of the UK Climate Change Programme**

## **Submission by Scottish Environment LINK March 2005**

Scottish Environment LINK (LINK) is the liaison body for Scotland's voluntary sector environmental organisations. LINK was established in 1987 to provide a forum and network for the voluntary environmental sector and to assist in co-operation and communication with government bodies and others with a role in Scotland's environment.

LINK members view climate change as the most serious problem facing the globe. There is clear evidence that the impacts of climate change are already being experienced and that they will get worse. Urgent action is required to reduce the anthropogenic greenhouse gas emissions that cause climate change if we are to avoid the worst consequences.

The UK government and devolved administrations are rightly taking a lead in aiming to exceed the Kyoto targets for emissions reduction. Although progress has been made, it has been limited and the UK is unlikely to meet its target of 20% emissions reduction from 1990 base levels by 2010, under the current climate change Programme.

Scottish Environment LINK has submitted comments on the Scottish Executive's Climate Change programme and since many of the key policy areas are reserved matters we welcome the opportunity to provide the following comments on the UK programme. The organisations supporting this submission are listed below.

### **1) Improved Policy Delivery and Coordination**

At the moment there is no mechanism to bring together key stakeholders at a UK level to work together on climate change.

The Government should establish a high level task force to bring stakeholders together to assist in developing climate change policies and monitor their delivery. Devolved administrations would need to play a key role.

### **2) Emissions Targets**

We urge the UK government to continue to work towards firm UK emissions reduction targets from the 1990 baseline year for 2010 and 2050. We would also recommend setting annual improvement targets in emissions across all key sectors to stimulate year on year progress. Targets should be based on actual emissions reductions from a baseline rather than being compared against projections, which can be unreliable. It is also important that the government targets focus on emissions (ie the real outcome) rather than simply using other measures such as progress on renewables, which may not equate to emissions reduction.

### **3) Energy Saving**

Urgent priority should be given to energy efficiency and demand management as this offers the largest, cheapest and least damaging opportunity for significant carbon emission reductions. The UK Government should introduce domestic and commercial energy reduction targets to achieve at least a 40% improvement by 2020. Scotland can move forward with its own energy efficiency targets and strategy, but Scottish targets would need to blend with UK targets. Only partnership working with the UK Government – enabled by fiscal and other reserved responsibilities - will ensure progress to the 2010 emissions reduction target.

#### **4) Combined Heat and Power**

The UK Government has set targets on Combined Heat and Power but has not provided any single, dedicated instrument for delivering it. We would encourage the early introduction of such an instrument with sufficient resourcing to support delivery of the CHP target. In addition the UK Government should lead by example in requiring all new major buildings built by or for the public sector to include CHP and/or renewable energy sources. This would lead to major reductions in emissions, set an example for the private sector as well as create jobs and new industries in the UK.

#### **5) Research and development investment in the full range of renewable energy technologies**

To reduce our climate change emissions the UK must invest in all forms of renewable energy, to make electricity, fuels and direct heat. As a result of the Government's design of the Renewables Obligation which supports only near market technologies most effort has gone on electricity from on-shore windfarms. We would like to see more financial support either through a banded Renewables Obligation or direct Government funding for research and development in other renewables.

#### **6) Make the price of all transport journeys more fairly reflect their cost to the environment**

Emissions from traffic are growing year on year, while most other emissions are falling. If no action is taken, transport could be the largest source of CO<sub>2</sub> before 2015.

The UK Government, along with devolved administrations, need to take action on fiscal policies to ensure that transport pays for its external environmental and social impacts.

For example, Vehicle Excise Duty for large, polluting, 4x4s and Sports Utility Vehicles should be much higher than those for normal cars. The UK Government must also lead talks in Europe to make the price of flights properly reflect their growing contribution to climate change emissions.

#### **7) Set tough emissions trading targets for power companies and industry**

The power companies and other big industries are among our biggest producers of carbon dioxide. To deliver a cut of at least 20% by 2010, the UK Government must set tough limits for carbon dioxide emissions on power companies and other industry sectors covered by the new European Emissions Trading Scheme.

#### **8) A sustainable approach to Mitigation and Adaptation**

Climate change should be made a major consideration in all areas of Government decision making and processes. Currently a number of competing priorities prevent a proper, joined up response to climate change. A sustainable approach would seek ways of delivering climate change and other policy objectives for example through proper strategic planning to deliver renewables without causing environmental harm.

It is also important to ensure that adaptation to climate change is taken forward in a sustainable way, such as addressing flooding through catchment management, incorporating natural systems.

New scenarios on the likely scale of climate change are now more alarming and since it is now accepted that some degree of climate change is going to take place the **adaptation** must be given a more prominent role in the revised strategy. The new strategy will need to address, amongst other, the threats posed by flooding, coastal realignment, changing farming practices and habitat fragmentation. We need to prepare today for the changes which will happen in the coming decades. Adaptation to the reality of climate change can drive policy on the environment whilst, at the same time, safeguarding economic prosperity.

An integrated approach to the revision of the UK Climate Change Programme should inform an expanded adaptation section which focuses on the need to allow for spatial movement of species in response to climate change and restore the land to ecological functionality. Where possible, measures must be implemented that prevent adverse effects, such as the loss of important species, habitats and archaeological sites.

Landscape scale action should be pursued, facilitated by protection of all semi-natural habitats, restoring and creating new habitats, a more co-ordinated vision of land use to make it more permeable to species movement and allowing the recovery of the marine environment. As well as being good conservation practice, this approach can deliver economic and social gains such as flood alleviation, recreation and tourism and increased air and water quality. These aims could be delivered through a variety of agricultural, marine and land use mechanisms. It is important that measures, such as those aimed at tackling flooding, use as a first line of response sustainable flood management and soft-engineering techniques, and do not rely on building ever higher concrete flood defences. An adaptive strategy for biodiversity would protect, restore and expand existing important habitat, and make the wider countryside more wildlife friendly to allow species and habitat movement.

**Members of Scottish Environment LINK supporting this consultation response:**

Badenoch and Strathspey Conservation Group  
Biological Recording in Scotland  
British Trust for Conservation Volunteers  
Butterfly Conservation Scotland  
Cairngorms Campaign  
Council for Scottish Archaeology  
Friends of the Earth Scotland  
Hebridean Whale and Dolphin Trust  
Marine Conservation Society Scotland  
Mountaineering Council of Scotland  
North East Mountain Trust  
Plantlife Scotland  
Rangers' Association Scotland  
Royal Society for the Protection of Birds  
Royal Zoological Society of Scotland  
Scottish Council for National Parks  
Scottish Native Woods  
Scottish Wildlife Trust  
Soil Association Scotland  
Sustrans Scotland  
The National Trust for Scotland  
Whale and Dolphin Conservation Society  
Woodland Trust Scotland  
WWF Scotland