

# Taking it on: developing UK sustainable development strategy together

Scottish Environment LINK's response

July 2004

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations in Scotland - 36 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more sustainable society. This response to 'Taking it on' was prepared by LINK's Sustainable Scotland Task Force, which also published a review of progress on sustainable development in Scotland called 'Must Try Harder' in June 2002.

Our members believe that the UK and Scottish sustainable development strategies are central to preserving and enhancing our environment – and the biodiversity, countryside and cultural heritage that it sustains – and to reduce the adverse impact of UK consumption on other environments and societies around the globe. We therefore welcome the government's plan to put in place a new UK strategic framework for sustainable development through to 2020, to provide both a consistent approach and focus across the UK and renewed action to deliver sustainable development goals. We particularly welcome the commitment to produce, in due course, a Sustainable Development Strategy for Scotland ('Meeting the Needs' was not a strategy as stated in the consultation). We also welcome the opportunity to comment on this broad-ranging issue and present our key concerns below.

## Key Concerns:

- Definition of Sustainable Development
- Trade offs
- Climate change and energy
- Sustainable consumption, production and use of natural resources
- Environmental and social justice
- Getting structures right for leadership
- Use of indicators

## Definition of Sustainable Development

Quite correctly the *definition* of sustainable development starts from the Brundtland definition, but we believe that the UK government and the devolved administrations need a *vision* of sustainable development which is more robust than the 1999 vision. A good attempt at defining a vision of a Sustainable Scotland can be found in the recent report by the Sustainable Scotland Commission:<sup>1</sup>

“Our vision for Scotland in 2030 is a country with an idea of where it wants to be at least 15 years beyond that; of the means of achieving it; and of the stepping stones measuring progress towards it - a country :

- Whose governments, at local, national and international levels, develop strategic policy and key programmes in a holistic way with sustainable development at their core.
- Where Ministers' roles are focused across government as a whole, not in narrow departmental roles.
- With strong continuous incentives – equivalent to the profit motive – to promote sustainable policy and action by business and public corporations, delivered through fiscal and accountability measures.
- Where businesses take responsibility for their impacts on the environment and the communities within which they function and make a positive contribution towards sustainable development.
- Where the bulk of our energy needs come from renewable sources.
- With an integrated system of frequent and affordable public transport between our centres of population; and which recognises the particular issues of rural Scotland where mass public transport systems are ineffective and inefficient.

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<sup>1</sup> 'Working Together for a Sustainable Scotland,' Centre for Scottish Public Policy, May 2004.

- With agriculture, forestry and fisheries industries which are directly related to the carrying capacity of our land, sea and inland waters; which maximise Scotland's clean and natural image; and which recognises our countryside as a national asset.
- Where we have dramatically improved citizens' quality of life through reduction of pollution and radically reduced resource use and can see an improvement in biodiversity of species across the country.”

We would also like to suggest that the wording regarding the importance of the four objectives should state that ‘No one of these objectives is no *less* important than another’ as we believe that it would more effectively communicate the emphasis that all four objectives are to be targeted at all times.

Finally, we would like to express our concern regarding the concept and description of economic *growth* – centred on the use of GDP, or GNP, as the key indicators. We believe that the pursuit of economic growth will continue to block progress on sustainable development, and the focus should be shifted from the *size* of the economy to its *quality*. We would therefore suggest a change in objectives to economic *progress* or economic *development*, and suggest the adoption of an indicator such as the Index of Sustainable Economic Welfare to help measure this.

### **Trade offs**

We believe that sustainable development can only be meaningfully applied as an integrated idea. Extreme caution is therefore required when discussing trade-offs, to ensure that all of the core objectives of sustainable development are incorporated into policy and decision making. We are concerned in particular about the apparent acceptance in ‘Taking it on’ of social and environmental disbenefits as a result of optimising economic benefits. We believe that a more detailed discussion of this issue, with examples laid-out and a discussion of how short and long term considerations should be applied, is required in the new strategies.

### **Climate change and energy**

While we welcome the prioritisation of climate change in the strategy, we are frustrated that there is not sufficient emphasis on the need to reduce greenhouse gas emissions, throughout the economy, through increased efficiency and reduced use of high emission services/activities (eg car and airline travel).

There also appears to be no real recognition of the need for the UK to use its political influence – most significantly with the US, but also within the EU through more aggressive National Allocation Plans for the upcoming Emissions Trading Scheme - to ensure progress on reducing greenhouse gases globally.

The Scottish Executive has failed to provide strong leadership on climate change, refusing to define what level of emissions’ reductions Scotland is aiming for, and stating only that Scotland will ‘play its part’ and make an ‘equitable’ contribution to meeting UK targets.

According to official figures Scotland’s climate change emissions fell by 1.5% between 1990 and 2001. The overall UK reduction was 15%. Scottish emissions of carbon dioxide, the main greenhouse gas, actually rose by 0.2% between 1990 and 2001, with a 3% increase between 2000 and 2001. Scotland has clearly not ‘played its part’ nor made an ‘equitable’ contribution so far.

Transport is the most important area where the UK and Scottish governments have really failed to take action to reduce climate change emissions, with a massive rise in transport emissions predicted over the next two decades. The Scottish Executive’s current traffic stabilisation target is both weak and so far in the future as to be meaningless on its own. Interim emission reduction targets for transport should be set so that short term progress can be measured and major schemes like the M74 extension and the Aberdeen Western Peripheral Road reviewed against climate change aims. As well as investment in public transport the Scottish Executive should target short car journeys to produce a transfer to cycling and walking.

Aviation is the fastest growing source of anthropogenic climate change emissions in the UK. To tackle emissions from this sector the UK must plan to manage demand, and should begin by ending the favourable tax treatment of airports and airlines. The UK must take a lead role in European and international efforts to secure the inclusion of aviation emissions in climate change agreements.

Around 20% of Scotland's climate change emissions come from the land, mainly because of the way we manage land for forestry and agriculture. The Scottish Executive's Forestry and Agriculture Strategies have both failed to take this issue seriously and should be revised as a result of the Climate Change Programme review. In particular, our peatlands are both valuable carbon stores and habitats of international importance. Measure should be put in place to prevent damage to more pristine peatlands, and to restore damaged sites. The restoration of damaged peatland sites has the potential to eliminate significant CO<sub>2</sub> emissions.

We support the conclusions of the recent enquiry by the Scottish Parliament's Enterprise and Culture Committee that, while expansion of onshore wind generation is necessary, the Scottish Executive needs to do more to develop other renewables, to set an energy efficiency target and to develop a better locational strategy for renewables' developments.

As well as seeking to reduce emissions to minimise future climate change, the strategy must incorporate measures to adapt to the inevitable climate change from past emissions (and those not eliminated in future).

In particular, the potential and likely impacts of climate change on the UK's biodiversity need to be assessed with mechanisms in place to minimise adverse effects. Landscape scale planning to put in place habitat networks is a hugely important strategic issue that will increase flexibility to help species adapt to climate change and move to more suitable areas. Given the strategic level at which this action needs to be taken, and its relevance across other strategies and policy areas, the Scottish Biodiversity Strategy, and policy areas, action must be targeted at putting in place the necessary administrative structures to ensure integrated planning at a landscape scale is achieved.

In addition, the impacts of climate change on coastal and riverine flooding need to be assessed – and policies implemented to reduce impacts on communities. In so doing, adopting a sustainable approach to flood management – by the creation of wetlands and/or by managed coastal realignment – will also provide benefits for biodiversity.

The revision of the UK and Scottish Climate Change Programmes this autumn presents the ideal opportunity for the Scottish Executive to assert strong leadership, define what Scotland plans to do and put in place the mechanisms to achieve this.

### **Sustainable consumption, production and use of natural resources**

We welcome the proposal that our natural resources be one of the key priority areas for the new sustainable development strategy. However, we are concerned that the discussion appears to focus only on our use of natural resources and the limits they present to economic growth, rather than the need to protect and value our natural resources in their own right. Meanwhile, the recognition in 'Taking it on' that assessing environmental limits is complex, supports our contention that growth should not be pushed to these 'perceived' limits because of the uncertainty of defining what these limits actually are. The Precautionary Principle should be fully reflected the final strategies.

The protection of the environment, and the conservation of biodiversity is a key area of concern in the sustainable use of resources and we would like to see stronger links made between use and conservation. These are not mutually exclusive and by promoting sustainable use, conservation of natural resources naturally follows. This is already reflected in targets that deal with trade, plant use and sustainable

livelihoods in the Global Strategy for Plant Conservation<sup>2</sup>, ratified by the UK government in 2004. We would also stress that our use of natural resources is not just limited to UK – the strategy must focus action both on conserving natural resources within the UK but also on curbing demand for, and ensuring sustainable use, of natural resources from overseas. Hard woods, peat and Sphagnum mosses are good examples of sectors where excessive UK demand and tightened UK legislation, has exported a demand currently met through imports and damage to habitats overseas.

We believe that it is the responsibility of the UK government and devolved administrations to determine areas of key concern regarding excessive consumption of natural resources, and then to ensure that these are addressed through policy and regulation. This may involve bans on highly unsustainable goods and services, introducing limits on others and implementing fiscal incentives/disincentives such as subsidies and taxation to change the economic viability of the product involved. Varied examples of this include the plastic bag tax introduced in Ireland and proposed in Scotland, the European Emissions Trading Scheme and the Aggregates Levy. More could be done in many other areas. The use of fuel is a priority area – with more substantial increases in vehicle and airline taxation required. Adopting an indicator of Scotland’s ecological footprint would serve as a useful tool in establishing and reporting on Scotland’s consumption levels.

With strategies in place which begin to improve the Scotland’s poor record on recycling municipal waste it is important to ensure that:

- Increasing waste volumes are tackled, with a target to reduce these over time working towards a zero waste policy.
- A robust strategy with targets is established to tackle commercial waste arisings which are far greater than those from domestic sources.

## **Environmental and social justice**

Communities need to be given readily enforceable rights, to enable them to hold both political and business decision makers accountable for the impacts of decisions. The Aarhus Directive should be robustly implemented to ensure that it truly delivers environmental justice for communities in the UK relating to information, participation and access to justice.

## **Getting structures right for leadership**

Sustainability needs to be right at the heart of all policy making but for this to happen, currently separate policy areas, departments and strategies need to work together. For example, the Scottish Biodiversity Strategy has a number of actions that contribute directly to sustainable development and the UK and Scottish Climate Change Programmes are due to be revised later this year. It would make sense if these strategies worked towards the same objectives while supporting each other and avoiding duplication of effort.

At the UK government level the apparent imbalance of power between DEFRA and the DTI, and the lack of constructive dialogue between the two departments, continues to maintain the belief that economic growth outweighs environmental issues. Meanwhile key policy roles are played by completely separate units within the Office of the Prime Minister and the Cabinet. To address this issue, we suggest that either an interdepartmental network or independent panel is needed which has the power to balance the needs and arguments of the various government departments involved and to make tough decisions on the basis of sustainable development principles rather than the aims and objectives of the individual departments. Or that the sustainable development unit is placed closer to the centre of Government, potentially in the Office of the Prime Minister and the Cabinet.

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<sup>2</sup> “Plant Diversity Challenge: the UK’s response to the Global Strategy for Plant Conservation,” 2004.

In Scotland the Sustainable Development Directorate should be moved into a more central policy-making position, closer to the First Minister as recommended by the Centre for Scottish Public Policy's report 'Working Together for a Sustainable Scotland' (May 2004), LINK's 'Must Try Harder' report (June 2002) and many other commentators. We also recommend that the Scottish Parliament should be given a duty to conduct an annual audit of sustainable development progress.

### **Use of indicators**

We believe that in addition to purely being used to measure progress (or underperformance), more emphasis should be placed on using indicators to set quantifiable and measurable targets for sustainable development, for instance, through the current Scottish Spending Review. However, extreme caution is required regarding which, if any, indicators are used to drive policy specifically, so as to ensure that overall sustainable development is being achieved, rather than a narrowly defined benchmark.

We suggest that the Scottish Executive considers developing more indicators that people can relate to, for example to enable individuals to be able to measure their own sustainability or ecological footprint.<sup>3</sup> This could be used to promote interest and education on the issue of sustainable development. At the same time we support the idea of a set of a few headline indicators covering biodiversity, ecological footprint and alternative measures of economic and social progress such as the Index of Sustainable Economic Welfare and the Index of Multiple Deprivation.

LINK's Sustainable Scotland Task Force includes FoE Scotland, Plantlife Scotland, RSPB Scotland, Scottish Wildlife Trust, Sustrans Scotland, Woodland Trust Scotland, WWF Scotland

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<sup>3</sup> A recent survey (BBC Climate Poll, 29<sup>th</sup> July 2004) has shown that just under half of Britons felt that changing their behaviour would not reduce the impact of climate change.