



The Scottish Government
Climate Change Bill Consultation
1-G North, Victoria Quay
Edinburgh
EH6 6QQ

25 April 2008

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Dear Mr Wright

Response to the Scottish Government Consultation on Proposals for a Scottish Climate Change Bill

Scottish Environment LINK (LINK) is the network for Scotland's voluntary sector environmental organisations.¹ Our member bodies believe that Scotland needs urgent action on climate change and have been calling for greenhouse gas reductions to be delivered in a sustainable manner and for adaptation measures to be put in place to help secure our natural and cultural heritage.

LINK works closely with Stop Climate Chaos Scotland (SCCS) which is a coalition of environmental, faith, development, trade unions and others. We support the climate change asks of SCCS:

- **Set long term greenhouse gas reduction targets.** The Bill should require Government to keep within a fair share of global greenhouse gas emissions, at a level that restricts temperature rise to no more than 2°C. On current science, to stand even a 50% chance of doing this, we must set an overarching target to reduce greenhouse gases by at least 80% by 2050, based on 1990 levels.
- **Set statutory annual emission reductions targets of at least 3%: As an absolute minimum,** year on year cuts of at least 3% will be required to ensure that overall targets are met. Lower rates of annual progress will mean a higher level of cumulative emissions.
- **Include international aviation and shipping.** International aviation and shipping emissions should be accounted for in targets.

¹ www.scotlink.org

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- **Ensure climate change is addressed in a fair and sustainable way.** The Bill should require future policies for mitigation and adaptation to be developed in accordance with the principles of sustainable development, including the conservation and enhancement of biodiversity.
- **Revise targets only on the basis of independent advice using sound science.** Climate change science is complex and constantly developing, therefore the Bill should establish an independent Scottish Climate Change Commission to advise Government.
- **Adapt to climate change.** The Bill must include a requirement on Ministers to produce an adaptation strategy that includes environmental measures.
- **Ensure transparency and accountability.** Government must be required to make a Ministerial statement when reporting annually to Parliament on the previous year's progress towards meeting annual targets, on their future plans for doing so, on the impact of climate change and on Government's progress on adaptation work.

In addition to those points outlined above, we wish to elaborate on some of the environmental issues we think the Climate Change Bill should address. As there are only a few points, we have chosen to present these in a letter rather than completing the consultation proforma, although we have identified the consultation questions to which our responses relate.

Scottish Government should show a lead in tackling Climate Change

Climate Change is the greatest threat facing our environment and humankind and it requires immediate and sustained reductions in greenhouse gas emissions to avoid disastrous consequences. Currently, the best scientific advice points to the need for greenhouse gas reductions of at least 80% by 2050 if we are to stay below a 2°C increase in global temperature, which is considered the maximum manageable level if we are to avert the worst effects of climate change. We therefore want to see this reflected in the Scottish Climate Change Bill with strong statutory long-term and annual targets to deliver the necessary greenhouse gas reductions to stay below 2°C.

We are using our environmental experience and strong membership base in helping to address climate change, but we need the Government to provide the lead to ensure policies and decision-making go in the right direction to reduce greenhouse gas emissions.

A sustainable approach to tackling climate change

Sustainable development means considering the environment, social issues and the economy together. This is the only way to really tackle climate change. Our use of energy for homes, businesses and travel, our consumption of goods and food, and our use of the land and sea, are all major sources of greenhouse gas emissions. The goal of reducing these emissions needs to be

set within a legislative framework which encourages a sustainable approach, with demand reduction and efficiency at the top of the decision-making hierarchy. This means delivering energy conservation along with renewables without environmental harm, reducing waste and encouraging recycling. It means greater support for walking, cycling and public transport rather than expanding airports and roads. It also means finding ways to manage our land to provide multiple public benefits, including attractive landscapes and natural habitats, improved local economies and quality of life.

A sustainable approach will also avoid environmental conflict when considering the most appropriate ways to reduce greenhouse gas emissions or adapt to climate change. We and future generations depend on a healthy environment: there is no point in seeking opportunistic ways to address climate change which threaten biodiversity, landscapes or our cultural heritage. In fact, our natural environment, if managed sustainably, can often help in cutting emissions and providing the means to deal with a changing climate.

The Ministerial Foreword to the consultation document recognises the need for sustainability to be at the heart of all policies, including those addressing climate change, but this is not reflected in the legislative proposals. It is vital that such a strong legislative framework document should include a clear steer that climate change should be tackled in a sustainable manner.

Recommendation:

The Scottish Climate Change Bill should contain a duty on all public bodies to deliver climate change reductions in a sustainable manner in line with the national target.

Adapting to the changing climate

Reducing emissions of greenhouse gases to prevent global temperatures rising above 2°C is the only way to keep climate change within manageable levels. But even with prompt action we will face some degree of climate change as a result of past emissions. Scotland's rural, urban, marine and coastal habitats are going to be affected by climate change. We need strategies to reduce the impact on Scotland's biodiversity and allow species and habitats to adapt, where necessary. From coping with flooding to realigning coasts and from changing our farming practices to integrating planning with biodiversity conservation, we need to prepare today for the changes that will happen in the coming decades. Species and habitats important to Scotland are vulnerable to climate change because many are in a damaged condition and exist in a fragmented landscape, threatening their continued survival and depriving them of the ability to shift to climates that are more suitable.

Measures must be implemented to prevent the loss of archaeological sites, species and habitats, and help these to cope with new climate regimes. Where species and habitats will have to adapt or move we must assist this process. An adaptive strategy for biodiversity would protect, restore, expand

and link together semi-natural habitats and make the wider countryside more wildlife friendly. Planning for development, agriculture and forestry practices must work with biodiversity conservation to provide a landscape that is permeable to species movement. Dealing with sea level rise or flooding inland, for example, will require coordination between many sectors of Government to deliver solutions such as managed realignment or natural flood management which will bring biodiversity benefits as well as address flood impacts. We need an integrated approach to land and sea use, to avoid losing Scotland's characteristic species and habitats to climate change.

Our members have detailed views on the ways in which adaptation for the natural environment should be taken forward which we shall discuss in more detail in our response to the Scottish Government's proposed Adaptation Strategy, expected later this year. As the Climate Change Bill is intended to be an overarching framework piece of legislation, we are confining our recommendations in this consultation to the general legal requirement for adaptation strategies to be produced and reported on.

We would therefore like to see the Climate Change Bill establish a strong legal framework requiring Governments to produce strategies for adaptation which ensure that effort is coordinated across the sectors to deliver sustainable adaptation solutions. The legislation should also ensure that Governments commit to action to help our natural and cultural heritage adapt to the changing climate and report on progress to Parliament.

Question 13: Should the Scottish Ministers be required to report on any other issues related to climate change in addition to the requirements already set out? If so, what, and how often?

Question 30: Are there any provisions to help Scotland adapt to the impacts of climate change which should be included in the Scottish Climate Change Bill?

Yes. The Bill should contain a duty on Ministers to report on the impacts of climate change and to prepare an adaptation strategy with reports to Parliament on progress against the adaptation strategy's objectives.

Yours sincerely

A handwritten signature in black ink that reads "John Mayhew". The signature is written in a cursive style and is positioned above a horizontal line.

JOHN MAYHEW

Chair

On behalf of Scottish Environment LINK Member Organisations