

## REPORT ON PROPOSALS AND POLICIES 2

### Summary

We call on MSPs to ensure that the RPP2 package of measures ensures that we meet all our future climate targets and that early action is taken to avoid impact on the natural environment. LINK recommends that the RPP2 be improved to ensure:

- Proposals are upgraded to the level of Policy, and implemented early;
- Protection of marine environments;
- Specific improvements in the land use sector.

### Background

Wildlife and the natural environment are on the frontline of climate change and are seeing the impacts of climate change now<sup>1</sup>. These impacts are arguably, being played out most obviously in the marine environment. Substantial declines in North Sea plankton populations (70% since the 1960s<sup>2</sup>) and population crashes of kittiwakes and other seabirds in Shetland and Orkney have been linked with increasing sea surface temperatures.

In our report – Time to act on climate change<sup>3</sup> – we said, ‘We must mitigate the effects of climate change, by delivering immediate and sustained greenhouse gas reductions to prevent the worst consequences of climate change, while we still have time.’ LINK continues to believe that urgent action is needed in Scotland now, and wants to play a constructive part in helping to bring about the necessary response. LINK works closely with Stop Climate Chaos Scotland (SCCS) – some of LINK’s member organisations are also a member of SCCS.

### General points on RPP2

Like many environmental organisations, LINK was very disappointed when Scotland missed the 2010 annual target for GHG reduction. We believe that to avoid this embarrassment again the RPP2 must aim to set firm policies which provide abatement significantly above the annual target level, in order to provide contingency. We do not believe that the draft RPP2 does this because there is too great a reliance on uncertain and unconfirmed proposals. For example, RPP2 shows that in 2020, 64% abatement in the land-use sector will come from proposals. **LINK recommends that to meet all our targets we must fully implement all RPP proposals and policies.**

It is generally accepted that early action to cut emissions is vital (especially for our natural environment) and also cheaper than later spending. However, the RPP’s credibility is undermined by the majority of effort being planned for years post 2020. This can be observed clearly in the Rural Land Use sector. We cannot afford to wait until the 2020s to start taking action.

### Marine & Marine renewables

While the roll out of marine renewable energy is critical to decarbonise our electricity supply, great precaution must be taken not to harm the marine environment, already in a degraded and declining state.

The legal tools to help arrest the declines in marine biodiversity, and ensure that offshore development minimises harm, already exist - namely the EU Birds and Habitats Directives, and the Marine (Scotland) Act. However, this legislation remains either underutilised or looks set to be so. Specific examples are; no offshore Special Protection Areas for our internationally important seabird populations; the limited ambition and scope of forthcoming Marine Protected Area proposals; and the substantial delays to the publication of Scotland’s National Marine Plan. Far from acting as a hindrance, we believe that more comprehensive protected area networks at sea, and true marine spatial planning, will assist the development of the marine renewable energy industry by identifying environmentally sensitive areas to avoid. **LINK recommends that the RPP2 is**

<sup>1</sup> SPICe Briefing. Climate Change: The threat to species.

<http://www.scottish.parliament.uk/business/research/briefings-09/SB09-28.pdf>

<sup>2</sup> SAHFOS Eco Status Report 201/11

<sup>3</sup> LINK. <http://www.scotlink.org/files/publication/LINKReports/LINKctfStateClimateTimeAct.pdf>

**explicit in the means by which sensitive marine areas will be protected from marine development – particularly, in the context of RPP2, marine energy (oil & gas, and renewables).**

Scotland's marine carbon sinks, like kelp beds, seagrass beds and saltmarsh habitats, are akin to peatlands - vital for both biodiversity and the fight against climate change. However, many are in a degraded state, and salt marshes in particular are ironically now under threat from sea level rise caused by climate change,. Furthermore, saltmarsh can help protect communities and business from coastal flooding. **LINK recommends that marine carbon sink protection and enhancement should be included as a policy in RPP2.**

### **Rural Land Use**

The Rural Land Use sector cuts across the majority of LINK work areas and therefore RPP2 policies have the potential for multiple benefits for the environment, in addition to GHG reduction. However, LINK believes that the RPP2 rural land-use section again lacks ambition. When compared to RPP1 there is a reduction in the abatement ambition from policies in the land use sector, and too many of the policies and proposals rely too heavily on voluntary uptake – particularly in agriculture.

Peatland restoration is a welcome inclusion in RPP2 as a 'policy', although this is a restatement of an existing commitment of £1.7m for restoration. LINK members and partners have called for 600,000ha of Scotland's blanket bog under restoration management within 10 years. A new RPP2 proposal suggests that a target of 21,000ha/yr of peatland restoration is 'technically feasible'. Unfortunately, the wording does not formalise a target and allows room to do less. **LINK recommends that the peatland restoration target is formalised with a firm commitment to restore a minimum of 21,000ha/yr of peatland (blanket bog & lowland raised bog), and a commitment to finding funding.**

90% Nitrogen Efficiency Measures is a new proposal which introduces the threat of new regulation to boost uptake of these measures to 90% of farmers. We welcome this but believe that a regulatory trigger must be agreed and publicised in order to stir farmers into action if they wish to avoid regulation, as without this the threat of regulation is weakened. **LINK recommends that a date is clarified in RPP2 and a regulatory trigger for these measures is set and publicised.**

The proposals for developments in agricultural technology, and technical potential from low-carbon land use indicate large abatement levels by 2027. However these proposals and the abatement estimated are very opaque and lack credibility at this stage. **We recommend that these proposals are investigated by the Committee.**

This LINK Parliamentary Briefing is supported by the following member organizations;

**Archaeology Scotland**

**Association for the Protection of Rural Scotland (APRS)**

**Buglife**

**Butterfly Conservation Scotland**

**Hebridean Whale and Dolphin Trust**

**North East Mountain Trust**

**RSPB Scotland**

**Scottish Ornithologists Club**

**Scottish Wild Land Group**

**WWF Scotland**

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