

Written submission to the Rural Affairs, Climate Change and Environment Committee on the draft second Report on Proposals and Policies (RPP2)

by Scottish Environment LINK

Date: 19 February 2013



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 and, where appropriate, recovery of the marine environment;
- Specific improvements to policies and proposals in the land use sector.

Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland. LINK works mainly through Taskforces – groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits.

LINK members welcome the opportunity to comment on this consultation.

Background

Wildlife and the natural environment are on the frontline of climate change and are seeing the impacts of climate change now¹. These impacts are arguably, being played out most obviously in the marine environment. Substantial declines in North Sea plankton populations (70% since the 1960s²) 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 change³ – 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.

¹ SPICe Briefing. Climate Change: The threat to species.

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

² SAHFOS Eco Status Report 201/11

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

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 above the annual target level, in order to provide significant level of 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.**

Progress of RPP1 policies and proposals

Farming For a Better Climate – FFBC is essentially a communication and training initiative for farmers and land managers. Whilst we recognise that FFBC is reaching farmers, it is not adequately monitored⁴, both in terms of measure uptake or coverage across Scotland. We believe that attributing abatement to this policy is at best guesswork. RPP2 expects a 50% increase in uptake of most measures although as coverage is unmonitored a baseline is unclear and achieving this level of uptake is uncertain.

Peatland restoration – In RPP1 peatland restoration was a 'Supporting and enabling measure' and work has been done to include peatland restoration in RPP2 as a policy. The new policy in RPP2 restates an existing commitment to spend £1.7m on restoration.

Forestry – LINK recognises that efforts have been made to increase tree planting rates and that these are now nearing the 10,000ha per year target. LINK members were participants on the Woodland Expansion Advisory Group which advised Government about an appropriate target and implementation.

Anaerobic digestion has been dropped from RPP2 due to low uptake by farmers through the SRDP. The RPP1 proposal for **mandatory climate measures through the Common Agriculture Policy (CAP)** has also been deleted. While we recognise that the outcomes of CAP negotiations are uncertain, **we recommend that this proposal is reinstated into RPP2 to show that Scotland is committed to a future CAP subsidy compliance system which requires all farmers to adopt climate beneficial measures.**

RPP2 policies and proposals

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

⁴ para 9.4.5 of RPP2

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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. Greater work is needed to develop these proposals and confirm the estimated abatement, or alternative policies are required to fill the abatement gap.

Marine

Marine renewable - 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 avoid⁵. **LINK recommends that the RPP2 is 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).**

Marine habitats - Scotland's marine carbon sinks^{6 7}, are not included in RPP2, which LINK believes is a missed opportunity. 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.** We believe that kelp beds and seagrass

⁵ http://www.scotlink.org/files/publication/LINKReports/LINK_ACME_Report0610web.pdf

⁶ Sometime termed 'blue carbon'.

⁷ ClimateXchange, Current status and knowledge about potential sequestration capacity for 'blue carbon' sinks in Scotland.

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beds in Scottish waters should be adequately protected from disturbance and recovered where appropriate. We also recommend a programme to recreate saltmarsh habitats through a process of managed coastal realignment. Suitable locations along our coasts and Firths should be identified and prioritised for managed realignment and include areas where this habitat can protect homes and businesses against coastal flooding.

Contributing to the targets

The task of assessing whether the RPP2 proposals and policies will help Scotland achieve annual targets is not helped by the lack of transparency in the document. For example, the milestones included in RPP1 have been removed. **LINK is very concerned that without concerted effort to develop and implement the full range of proposals, along with the policies, Scotland will be unable to meet all of its annual targets.** Annex 2 of the RPP2 shows this clearly.

RPP2 includes few new policies and proposals. LINK believes that the RPP2 Rural Land Use section lacks credibility because the policies and proposals affecting agriculture rely too heavily on voluntary uptake. Abatement estimated is therefore not fully in Government control to achieve.

Abatement comparison between RPP1 and RPP2 Rural Land Use policies shows that ambition has actually decreased. Abatement ambition from proposals shows a small increase. Ambition is seen, however, in estimated abatement between 2020 and 2027 but, we believe, more transparency is needed regarding the estimates for many of the Rural Land Use proposals which are included in this period.

RPP2 Timescales

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.

This response is supported by:

Archaeology Scotland
Buglife
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Marine Conservation Society
Ramblers Scotland
Scottish Ornithologists Club
Scottish Wildlife Trust
Woodland Trust

Association for the Protection of Rural Scotland (APRS)
Butterfly Conservation Scotland
Hebridean Whale and Dolphin Trust
North East Mountain Trust
RSPB Scotland
Scottish Wild Land Group
Whale and Dolphin Conservation
WWF Scotland

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