

## Response ID ANON-HDX-1TAB-M

Submitted to **Climate Change Bill**  
Submitted on **2017-07-17 09:49:26**

### Proposals on updating target ambition

**1 Do you agree that the 2050 target should be made more ambitious by increasing it to 90% greenhouse gas emission reduction from baseline levels?**

Yes

**Please explain your answer:**

This is in line with what is required to meet the Paris Agreement, though at the very limit of feasibility according to the UK Climate Change Committee (CCC). It is appropriate to be ambitious.

**2 Do you agree that the Climate Change Bill should contain provisions that allow for a net-zero greenhouse gas emission target to be set at a later date?**

No

**Please explain your answer:**

One might have this as an aspiration but it is impossible to know when it might become even theoretically possible. Rather than give power to Ministers to act possibly decades hence, it would be more appropriate for the issue to return to the Scottish Parliament as a formal amendment to, or full refresh of, the (by then) Climate Change Act.

**3a Do you agree that the 2020 target should be for greenhouse gas emissions to be at least 56% lower than baseline levels?**

No

**Please explain your answer:**

The target apparently assumes a continuation in each year to 2020 of the 3 percentage points reduction achieved in 2014-2015. Over the past decade the annual reduction has been nearer to 2% than 3%. A target more modestly above 50% would be more consistent with the trend, though the replacement of Longannet's territorial emissions with imported (and thus uncounted) emissions from gas-fired generation in England to compensate for the intermittency of Scotland's unbalanced wind-dominated renewables generation portfolio might enable the 56% to be met (or might be lost in the emissions-trading fudge).

**3b Do you agree that a target should be set for greenhouse gas emissions to be at least 66% lower than baseline levels by 2030?**

Yes

**Please explain your answer:**

It is striking how much lower the ambition is for the next decade, reflecting the fact that by 2020 the low-hanging fruit has all been plucked.

**3c Do you agree that a target should be set for greenhouse gas emissions to be at least 78% lower than baseline levels by 2040?**

Yes

**Please explain your answer:**

**4 Do you agree that annual emission reduction targets should be in the form of percentage reductions from baseline levels?**

Yes

**Please explain your answer:**

Having long-term targets as percentages and short-term targets as absolute amounts is confusing and unhelpful.

**5 Do you agree that annual targets should be set as a direct consequence of interim and 2050 targets?**

Yes

**Please explain your answer:**

This is a desirable simplification. Emissions targets have taken a fairly simply proposition (the need to reduce emissions very substantially), albeit with genuine challenges of measurement, and made it unnecessarily and unhelpfully complicated in its presentation.

### Actual Emissions

**6 Do you agree that all emission reduction targets should be set on the basis of actual emissions, removing the accounting adjustment for the EU ETS?**

Yes

**Please explain your answer:**

Again, this is a most desirable simplification.

## **Reviewing Targets and Reporting on Policies and Proposals**

**7a What are your views on allowing the interim and 2050 emission reduction targets to be updated, with due regard to advice from the CCC, through secondary legislation?**

**What are your views on allowing the interim and 2050 emission reduction targets to be updated, with due regard to advice from the CCC, through secondary legislation? :**

No objection in principle to varying interim targets, though scope for manoeuvre appears limited unless there is a rapid disruptive worldwide change in energy technology (e.g. development and massive adoption of thorium reactors) or the level of ambition is to be diminished. Changing 2050 targets should only be through a full parliamentary process (cf question 2).

**7b What do you think are the most important criteria to be considered when setting or updating emission reduction targets?**

**What do you think are the most important criteria to be considered when setting or updating emission reduction targets?:**

It has to be driven by scientific knowledge and technological capability. The other considerations are appropriate 'to have regard to' but reference to the 'renewable energy sector' should be removed: the issue is low-carbon, not particular technologies.

**8a What are your views on the frequency of future Climate Change Plans?**

**What are your views on the frequency of future Climate Change Plans?:**

Quinary

**8b What are your views on the length of time each Climate Change Plan should cover?**

**What are your views on the length of time each Climate Change Plan should cover?:**

It should look to the next two interim targets.

**8c What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?**

**What are your views on how development of future Climate Change Plans could be aligned with Paris Stocktake Processes?:**

If it is intended to take away the lessons and actions for Scotland from the stocktake, to inform the next CCP, which seems sensible, then 12-18 months after the stocktake is appropriate.

**8d How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?**

**How many days do you think the period for Parliamentary consideration of draft Climate Change Plans should be?":**

No response.

**9 What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans?**

**What are your views on the proposal that any shortfall against previous targets should be made up through subsequent Climate Change Plans? :**

Frankly, this seems such an obvious requirement that it's a question hardly worth asking. It is all about progress towards the longer-term targets and under- or over-achievement in any particular year does not alter that.

## **Accessing the wider impacts of the proposals**

**10 What are your views on these initial considerations of the impact of the Bill proposals on Scotland's people, both now and in future generations?**

**What are your views on these initial considerations of the impact of the Bill proposals on Scotland's people, both now and in future generations?:**

The stark challenge any small polity faces in an increasingly turbulent global environment – unstable ecologically, economically and politically – is simply surviving and maintaining and making more equitable the standard of living of its people. It is inconceivable that this involves a larger population consuming more, either at a local or a planetary scale. So the government's climate change ambitions sit in direct contradiction to much other government policy. Progress will stall if the government continues to believe/pretend that we can adapt simply with a green-tweaked version of 'business as usual'.

**11 What are your views on the opportunities and challenges that the Bill proposals could present for businesses?**

**What are your views on the opportunities and challenges that the Bill proposals could present for businesses?:**

No response, though our answer to question 10 is of relevance.

**12a What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process? (Please give details of additional relevant sources)**

**What are your views on the evidence set out in the Environmental Report that has been used to inform the assessment process? (Please give details of additional relevant sources):**

No response

**12b What are your views on the predicted environmental effects as set out in the Environmental Report?**

**What are your views on the predicted environmental effects as set out in the Environmental Report? :**

No response

**12c Are there any other environmental effects that have not been considered?**

**Are there any other environmental effects that have not been considered?:**

No response

**12d Do you agree with the conclusions and recommendations set out in the Environmental Report?**

**Do you agree with the conclusions and recommendations set out in the Environmental Report?:**

No response

**12e Please provide any other comments you have on the Environmental Report.**

**Please provide any other comments you have on the Environmental Report.:**

No response

## **Other issues**

**13 Please use this space to tell us any other thoughts you have about the proposed Climate Change Bill not covered in your earlier answers.**

**Please use this space to tell us any other thoughts you have about the proposed Climate Change Bill not covered in your earlier answers.:**

More humility would be appropriate rather than boasting about Scotland's international leadership role – a role largely invisible from outside Scotland. Progress against targets may look good in terms of percentage reductions, but Scotland started from a high base. Scotland's per capita territorial emissions are still significantly higher than the EU average – of the order of 20% higher – and exceed those of most individual EU countries. This is catch-up, not leadership.

A target based on territorial emissions is not good enough. The true impact of Scotland's population upon climate change is its carbon footprint (i.e. the totality of emissions attributable to the Scottish population and its consumption). There is an increasing divergence between Scotland's territorial emissions and its carbon footprint, as shown in Chart 9 of Scotland's Carbon Footprint 1998-2013 (Scottish Government, April 2017). In terms of carbon footprint, we have started to go backwards. Ambition on territorial emissions is meaningless without the same ambition for Scotland's carbon footprint.

## **About You**

**What is your name?**

**Name:**

David Gibson

**What is your email address?**

**Email:**

david@mountaineering.scot

**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

Mountaineering Scotland

**Please specify organisation type (if applicable):**

Third sector organisation

**Other – please state.:**

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response with name

**We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?**

Yes

## **Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Neither satisfied nor dissatisfied

**Please enter comments here.:**

The platform is satisfactory.