

## STOP CLIMATE CHAOS SCOTLAND RESPONSE TO RURAL ECONOMY AND CONNECTIVITY COMMITTEE CALL FOR VIEWS ON THE CLIMATE CHANGE PLAN UPDATE 2021

REC Committee is particularly interested in the following questions as they relate to:

- rural affairs,
- agriculture,
- forestry and
- transport.

This response is submitted on behalf of Stop Climate Chaos Scotland (“SCCS”), the diverse coalition of over 50 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. This response complements those responses submitted by individual member organisations and by individuals who are associated with SCCS or its members.

This response is based on an analysis of the CCPu against the various [transformational changes that SCCS called for, as the Government was preparing the update. It should also be read in the context of our response to the ECCLR Committee which provides an overview of the CCPu and its ambition.](#)

### **1. What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?**

It is self-evident that progress to date has been insufficient. Greenhouse gas data, [released by the Scottish Government](#) in June 2020 showed that Scotland has missed its annual target for reducing emissions. **Climate change emissions actually increased between 2017 and 2018 by 1.5%.** In response to these data, [SCCS called for more actions](#) to deliver real and sustained reductions – this CCPu was the opportunity to deliver such actions, many of which [were proposed in advance by SCCS.](#)

### **2. Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?**

#### **(a) Agriculture**

Agriculture is called a “hard-to-decarbonise” sector (p63) where the CCPu relies on future and, as yet, undeveloped and potentially risky/counter-productive Negative Emissions Technologies (NETs) to address residual emissions. This approach is reflected in the sector envelope for agriculture showing a significantly smaller drop in emissions from 2020-2032 compared to other sectors. Yet, this is really a reflection of the lack of ambition in the agriculture chapter, rather than any genuine difficulties. We make further observations about the issue of NETs in our comments to both the ECCLR and EEFW Committees.

The suggestion (p183) that *“were Scotland to cease to produce high quality food, and in particular meat, then that production would simply take place elsewhere, effectively resulting in no change to global emissions and with the potential that our carbon footprint would be higher”* is disappointing and, close to denialist. Similar arguments could be made for any/all sectors, yet the plan and its proposals suggest significant transitions for much of Scotland’s economy is essential; the same must be true of agriculture.

Notwithstanding the above, it is welcome that the CCPu does acknowledge agriculture as an important issue to address. The *“new policy proposal to introduce environmental conditionality in the agriculture sector”* (for beef suckler from 2021, and more widely from 2022) is potentially welcome but lacks detail, especially in relation to its climate aspects/impact. However, even without such detail, this is one of the few relatively firm commitments to action in this section. Most of the actions suggested (p192-195) involve commitments simply “to review”, “to develop”, “to explore options for”,

etc. There is a clear and urgent need for a clearer vision, more ambitious targets, definite actions, and more specific timescales.

Some key issues have been recognised – but the actions associated are either a continuation of current activities or further review/consideration (such as those related to nitrogen and slurry). One potentially positive measure, the concept of Regional Land Use Frameworks, is referenced in the LULUCF chapter but not the agriculture chapter – leading to uncertainty as to if/how agriculture will be captured/influenced by these frameworks. Meanwhile, there is no mention in the CCPu of potentially climate-benefiting agriculture policies such as support for organic farming or the continuation/expansion of the Agri Environment and Climate Scheme (AECS)<sup>1</sup>.

Finally, there is no recognition or plan to integrate the various elements of the food system that contribute to the emissions under agriculture, waste and to other sectors. Farmers are not the only players responsible for these, as the food system is a complex multifaceted network. SCCS called for the creation of an integrated food plan to tackle the emissions embedded with the system both in terms of production and consumption. Although transport and waste have their own chapters, there is no reference to considering the food production, transport, waste, etc processes as a strategic/systemic issue.

### **(b) Forestry**

The CCPu does not include any new, ambitious new target for woodland creation; it simply re-iterates existing targets, and makes little, if any, effort to distinguish between intensive, non-native forestry and native woodland. Both can be beneficial in terms of carbon – but the former is dependent on the management practices adopted and use of the products (for instance, short rotation conifers used for biomass or pulp soon return any sequestered carbon to the atmosphere).

Funding is probably adequate, given that it is reiteration of existing funding for existing targets and without any target % for native trees.

The emphasis, elsewhere in the plan, on making energy from burning trees and capturing the carbon is, [according to Richard Dixon](#), “technically possible but you’ve got to like your hillsides plastered with Sitka spruce to make it work, in a return to the bad old days of 1980s-style forestry policy.”

### **(c) Transport**

There is no new policy or proposal in relation to the building of new trunk roads or motorways. However, a new target for 20% reduction in car-km (route map in 2021) and second strategic transport project review in 2021 provide opportunities to address the current road-building programme.

The new target to reduce car kilometres by 20% by 2030 is very welcome and forward thinking. This is not being done in other UK countries. A roadmap of how Government plans to make this happen will be produced in 2021. However, it does raise further questions, that must be addressed by the roadmap, including: why has the 20% reduction been chosen; could and should this be a greater reduction; and why only cars?

The five-year investment of over £500 million is a re-statement of the commitment in the Programme for Government. Whilst this was a welcome commitment to long term investment a £100m per year will actually see a real terms cut in investment and with match funding rules changing, the overall amount spent will reduce. It also represents little over 3% of the annual transport budget – well short of the 10% sought by SCCS.

The new £50 million for ‘Active Freeways’ is a potentially welcome initiative. This is said to ‘*involve identification and design development of the strategic active travel network, to provide segregated active travel routes on main travel corridors to city and town centres and major trip attractors linking communities throughout Scotland*’. The Executive Summary on page 8 states that these provide ‘*a sustainable link between our towns, cities and some of our most beloved national landmarks.*’ There

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<sup>1</sup> Although note subsequent press reports (e.g. <https://www.pressandjournal.co.uk/fp/business/farming/2767219/scottish-agri-environment-scheme-to-reopen-in-2021/> of AECS opening, in a restricted form, in 2021).

is, therefore, some confusion as to whether these Active Freeways will be within cities and towns or between cities and towns; this should be resolved/clarified. Other questions that arise from this policy include: -

- o Page 120 states '*Delivery of our first Active Freeways: segregated active travel routes on main travel corridors.*'
- o Is the £50m to be spent on design and development of the active travel network or on creation of segregated active travel routes?
- o Is this £50m a one-off amount or an annual addition to the active travel budget?
- o What are Active Freeways? Are these new routes between towns or within towns and cities?
- o If the £50m will be spent on infrastructure how many miles of segregated active travel route will be created with £50m.
- o If the £50 is to be spent on design and development will the cost of creating the Active Freeways come from within the £500m AT budget and Local Authority budgets?

In relation to the questions above, we would observe that £50m is a very limited sum - particularly if these freeways are both within towns/ cities and between settlements. Even within towns/ cities, networks cannot be created with £50m. For example the Spaces for People programme had an initial allocation of £10m and this was increased to £30m. A strategic active travel freeway network would require considerably more investment. The Committee may wish to consider whether the ambition and the funds allocated here are yet matched.

In addition, for such a freeway network to truly be implemented, it should be considered as part of the Strategic Transport Projects Review (STPR2) programme.

It is disappointing that there is no specific mention/policy of achieving zero emission zones in each city, but several measures might contribute to lowering urban emissions (such as "over £500 million in bus priority infrastructure to tackle the negative impacts of congestion on bus services and raise bus usage." (p121); workplace parking measures (p123; and phasing out of public sector petrol/diesel vehicles (p124)). The commitment that a '*majority of new buses purchased from 2024 [will be] zero-emission*' is also very welcome and will require meaningful investment.

Compared to the SCCS suggestion that all new ferries should be zero emission, the commitment that "30% of Scottish Government owned ferries will be low emission by 2032" (p127) is welcome but rather unambitious.

We welcome and support the commitments to extend concessionary fares schemes: "delivering a National Concessionary Travel Scheme for free bus travel for young people aged under 19" (p121) and a "review of discounts available on public transport to those under the age of 26 has also begun, due for completion by the end of this year" (p122).

There is no real action on aviation – some commitments re flights within Scotland (including a "zero emission aviation region" (in H&I)); but very little re flights to/from Scotland. Demand management measures such as a Frequent Flyer Levy would have an impact and should be included in the Plan.

Finally, we are concerned that the "emissions reduction pathway for transport (p119 and 253) ceases to fall after 2028. This should be clarified. With a continued shift to electric vehicles the emission reductions should continue – or are other issues arising that prevent this?

### **3. Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?**

Addressed, where appropriate in various comments under Q2.

### **4. To what extent do you think the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors?**

SCCS has been critical of Government for not including policies in previous Climate Change Plans which more forcefully influence and change people's travel choices and behaviour. With the introduction of a target to cut car kilometres by 20% by 2030 Government has committed to changing the behaviour of people in terms of their travel choices. This must be applauded, however, we will need to see the promised 'route map' of policies and measures before we can judge whether Government is putting in place sufficient and realistic measures to achieve the target.

#### **5. To what extent do you think the CCPu delivers a green recovery?**

SCCS fully supports the concept of a "green recovery" and many of our members have contributed to Scottish Government thinking on this issue, as well as delivering 'on-the-ground' activities. Our response to the ECCLR committee call for views on green recovery in August 2020 can be read [here](#).

It is self-evident that for a green recovery to be 'green', it must deliver reductions in emissions consistent with the net-zero by 2050, and 75% by 2030, targets. As indicated in our responses to questions 1-4 above (and in response to the other Committees), we are concerned that the plan, while seeking to achieve these welcome targets, does not contain sufficient detail or commitments to ensure that is the case.

In relation to 'recovery', SCCS has always recognised that addressing climate change will require changes to the economy – and we have promoted the concept of a 'Just Transition' to ensure that those changes are fair. We therefore warmly welcome that the CCPu states "*across all of the actions in this Climate Change Plan update, we are embedding a just transition, ensuring that we assess how green recovery actions address inequalities and deliver wellbeing outcomes for everyone*" (p42).

It is also very welcome that the Just Transition concept is therefore fully acknowledged in introduction and in the Green Recovery chapter/context, which includes a specific 'box' headed Just Transition and refers to the recommendations of the recent Just Transition Commission.

However, there is no commitment to a separate Just Transition plan or any commitment to revise/update the current Economic Strategy. There is no reference to continuing the (non-statutory) Just Transition Commission or placing it on a statutory basis. While there are references to the role of Enterprise agencies, growing the clean energy industry and the roles of public procurement, these are primarily all good intentions with unclear delivery pathways.

Accordingly, we therefore recommend that the 'green recovery' aspects of this plan are (a) made genuinely 'green' by the strengthening of the actions to reduce emissions and (b) that the commitments to a just transition are underpinned by, for instance: -

- A clear commitment to a specific Just Transition Action Plan.
- A commitment to continue the Just Transition Commission (and place it on a statutory footing), as well as seek its advice on further steps.
- A commitment to a full revision of the current economic strategy to recognise the need for a green recovery (including major green investment supporting job creation, and strong skills action), as well as a just transition and a transition to a well-being economy.