

Climate Change: Consultation on proposals for a Scottish Climate Change Bill

Response from TRANSform Scotland
Wednesday 23rd April 2008

1. Introduction

- 1.1 Transform Scotland¹ welcomes the Scottish Government's proposal for a Scottish Climate Change Bill, and most of the details of the proposed legislation. We certainly welcome the ambition for Scotland to become a world leader in delivering the transition to a low carbon society (§3.12).
- 1.2 Transform Scotland is a member of the Stop Climate Chaos Scotland coalition and is content to be associated with the views that SCCS expresses in its response to the consultation. (Given what we understand to be the very high response rate to this consultation, we see no merit in repeating the responses to the questions that the Stop Climate Chaos coalition sets out in its response.) However, for the avoidance of doubt, we would like to make it clear that we support SCCS's 'headline priorities', and specifically the need for a 3% annual target and for provision to be made in the Bill to include emissions from international aviation and shipping.
- 1.3 As the national sustainable transport alliance, we naturally have a particular concern about the rapidly rising levels of emissions from the Scottish transport sector. We are therefore disappointed that the consultation document almost completely neglects consideration of the transport sector and fails to suggest any 'supporting measures' for achieving emission reduction from the transport sector. As such, we have put forward one proposal for consideration as an addition to the Bill.

2. International aviation and shipping

- 2.1 We consider it a serious anomaly for the proposed Bill to fail to make provisions for including international aviation and shipping in national inventories.²
- 2.2 We accept that there may currently be problems with "methods for apportioning aviation and shipping emissions within an international framework" (§5.52). However, we do not consider that this is in itself a satisfactory reason for giving an exemption for these sectors.
- 2.3 We recommend that the Bill be drafted so that international aviation and shipping emissions can be apportioned once there is agreement on how this should be done. It would not be satisfactory, as appears to be suggested at §5.52, for this to require separate legislation ("include these sectors in the legislative framework at a future date").
- 2.4 Given the high levels of public concern over aviation emissions in particular, a failure to include provision for including aviation and shipping would undoubtedly be read as giving these sectors a specific exemption from action on climate change.

¹ Transform Scotland is the national sustainable transport alliance. We campaign for a more sensible transport system, one less dependent on unsustainable modes such as the car, the plane and road freight, and more reliant on sustainable modes like walking, cycling, public transport, and freight by rail or sea. We are a membership organisation bringing together rail, bus and shipping operators; local authorities; national environment and conservation organisations; local environment and transport campaign groups; and individual supporters.

² As has been suggested by one commentator, that is a bit like setting yourself a weekly alcohol limit but then deciding not to count how much whisky you drink!

3. 'Supporting measures' on transport

- 3.1 It is well known that transport is the main sector in which no progress is being made in tackling climate change. Indeed, the Scottish Government's own figures show an 11% increase in emissions from the transport sector between 1990 and 2005.³
- 3.2 In the context of increasing road and air traffic levels, very limited progress on technology, and a major infrastructure programme aimed at expanding road and air capacity,⁴ the emerging Scottish Government view appears to be that little progress will be made on reducing emissions from the transport sector.
- 3.3 We do not accept this position. The transport sector provides ample opportunities for delivering reductions in carbon emissions and there is already a large and expanding body of evidence on this topic.⁵ While this is not the place to set out a detailed carbon emission programme for the transport sector, we would suggest that there is a wide range of measures that can be implemented – many at low cost and in short timescales. The range of measures that will have to be implemented will include:
- 3.3.1 Behaviour change measures
- Smarter Choices (e.g. workplace & school travel plans, car clubs & car sharing)
 - Eco-driving
- 3.3.2 Better regulation
- Improved speed management
- 3.3.3 Technical improvements
- Improved fuel economy standards
 - Improved emissions standards
 - Low emission vehicles
 - Alternative fuels
 - ICT developments (e.g. videoconferencing)
- 3.3.4 Improvements to infrastructure
- Modal shift to walking and cycling, public transport and rail and sea freight
 - Urban form and land use changes (e.g. land use planning decisions which reduce the need to travel, road space reallocation to sustainable transport modes)
- 3.3.5 Economic instruments
- Fiscal policy (including road fuel taxes, further differentiations in VED, and aviation taxes or charges)
 - Road user charging
 - Carbon rationing / Personal carbon allowances
- 3.4 The consultation document is therefore disappointing in its failure to set out *any* proposals for 'supporting measures' on transport.⁶ Given the size of the transport sector, we think it to be neither equitable nor realistic to expect other sectors to take a disproportionate share of the burden in reducing emissions.
- 3.5 It has subsequently become apparent that the shadow Committee for Climate Change intends to follow a marginal abatement cost curve (MAC curve) approach to carbon budgeting. Whilst the UK MAC curves are not yet available, there is already sufficient evidence on this approach, with the outstanding example being perhaps that produced by McKinsey & Company in December 2007.⁷

³ Scottish Government briefing *Climate Change in Scotland* (undated).

⁴ See e.g. our submission to the consultation on National Planning Framework 2 - <http://www.transformscotland.org.uk/info/docs/2008-04-15_NPF2.pdf>.

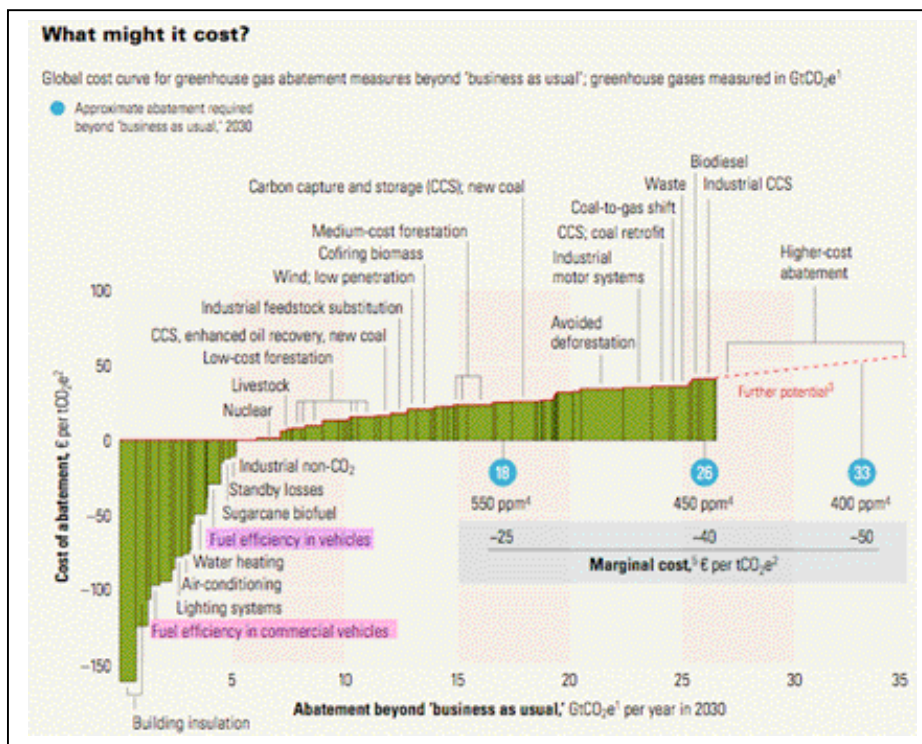
⁵ We would suggest that the 'visioning and backcasting' approach of Banister & Hickman is as good a place to start as any other – see <<http://www.ucl.ac.uk/~ucft696/vibat.html>>. The *Low Carbon Transport* briefing from Sustrans provides a good introductory briefing – see <<http://www.sustrans.org.uk/webfiles/Info%20sheets/ff44.pdf>>.

⁶ ... other than setting out a case for *not* taking action on international aviation and shipping!

⁷ See <<http://mckinsey.com/clientervice/ccsi/greenhousegas.asp>>. We note that the CBI climate change task force report also presented some preliminary MAC curve analysis for the UK.

- 3.6 The McKinsey analysis found that energy efficiency measures were not only cost-effective, but also cost-saving (that is, carrying out energy efficiency measures were not only an effective way to reduce climate change emissions but that they were financially beneficial for those involved). We note that a number of transport measures fell into this category.

Source: The McKinsey Quarterly (2008) 'A cost curve for greenhouse gas reduction'.⁸
Our emphasis added to "fuel efficiency in commercial vehicles" and "fuel efficiency in vehicles".



- 3.7 Specifically, we note that fuel efficiency in vehicles fell into the category, in McKinsey's words, of "negative cost ... a net benefit or savings to the economy over the lifecycle of the option".⁹

3.8 As such, and given the escalating levels of emissions from the transport sector, we propose that the Scottish Climate Change Bill include provisions for Scottish fuel economy standards for the transport sector. We intend to come forward with detailed proposals on this issue.

4. Summary of response

- 4.1 We welcome the Scottish Government's proposals for a Scottish Climate Change Bill and the ambition that it sets out.
- 4.2 We endorse the views of Stop Climate Chaos Scotland as expressed in its submission to the consultation. In particular, we support SCCS's 'headline priorities', and specifically the need for a 3% annual target and for the Bill to include emissions from international aviation and shipping.
- 4.3 We recommend that provision be made in the Bill for emissions for international aviation and shipping to be apportioned once there is agreement upon how this can be done.
- 4.4 We note the lack of provisions in the Bill as it currently stands to tackle emissions from the transport sector and, following the findings of the internationally-respected consultancy firm McKinsey & Company, we recommend that the Bill makes provisions for Scottish fuel economy standards for the transport sector.

⁸ See <http://www.mckinseyquarterly.com/A_cost_curve_for_greenhouse_gas_reduction_1911_abstract#registerNow>
⁹ We note that the CBI report came up with similar findings.

TRANSform Scotland is the national sustainable transport alliance, campaigning for a more sustainable and socially-just transport system. Our membership includes bus, rail and shipping operators; local authorities; national environment and conservation groups; consultancies; and local transport campaigns.

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