

Response ID ANON-NPZB-H7XG-R

Submitted to Climate Change Targets Bill

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Organisation

Organisation details

Name of organisation

Name of organisation:

Quakers in Scotland

Information about your organisation

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Quakers are a faith group committed to trying to live by, and work for, peace, equality, truth, simplicity and sustainability, our five Quaker "testimonies". We promote these values across Scotland through practical action and advocacy, and they underpin our response to this consultation. Quakers have as a guide a handbook, "Quaker faith & practice" which includes "Advices & queries" (A&Q) to help us check our own lives against the values we hold.

As Quakers we believe that humans "do not own the World and its riches are not ours to dispose of at will" (A&Q 42). In the face of overwhelming evidence of rapidly increasing destruction of the life systems of the Earth we are called to work for an equitable way of life, driven by justice rather than unsustainable growth, so that human life on earth is sustainable and fulfils the best of human potential.

It is essential that Scotland retains the just transition and international climate justice principles, as set out in the current legislation, and ensures that they are applied to all climate change policy actions. Key international commitments that should be explicit include the Paris Agreement target to hold "the increase in the global average temperature to well below 2°C above pre-industrial levels" and pursue efforts "to limit the temperature increase to 1.5°C above pre-industrial levels." There should also be recognition of the concept of common but differentiated responsibilities and respective capabilities, as enshrined in the United Nations Framework Convention on Climate Change, which highlights that Annex I countries (such as Scotland and the UK) have a greater mitigation role than others.

As Quakers we have a commitment to truth and integrity. The rhetoric and actions from the Scottish Government on the topic of climate change and carbon budgets should be clear and consistent, being honest with the public and the Parliament and bringing people with them on climate strategy. The Scottish Government must act with the urgency required by the climate emergency which it has acknowledged. We must avoid false solutions and expedite sustainable ones in a fearlessly equitable way. The co-benefits of emissions reductions, particularly improved health and lower energy bills, should be emphasised.

Clarity of communication about both the benefits and the urgency of action is integral to achieving the goals approved by Parliament. Consistent failures risk a reduction in public confidence. We look forward to seeing the Scottish Government get back on track and fulfil its ambition to be a world leader on climate, including by prioritising the Heat in Buildings Bill (as praised by the CCC) as a matter of urgency, and by taking more actions in the areas of transport, buildings, agriculture, land use and waste. Carbon budgets, or targets, can both be a useful management tool, but they must be a spur to action to take parallel steps to significantly improve delivery in areas within the power of the Scottish Government.

Part One – Carbon budgets

1 Do you agree or disagree with the proposed shift to 5-yearly carbon budgets (in place of current system of annual targets)?

Agree

Please provide your response in the box provided.:

On balance we agree with the proposed shift: the targets are now associated with failure, and the budget route is an opportunity to recalibrate goals through budgets that reflect Scotland's fair share of carbon cuts in the framework of global climate justice. The importance of targets or budgets is that the Scottish Government must be legally compelled to act swiftly to meet the 2045 net zero goal. The budgets will be a management tool, as the targets were, to ensure that we achieve this.

Context: the impact of Climate Change is accelerating. The full effects of carbon already in the atmosphere have yet to be felt. People on every continent are already suffering. The 2045 net-zero target is laudable in one way because it says we undertake to deal with the crisis. However, while we work towards a date 20 years in the future, our current way of life is sentencing communities around the world to disaster while we continue to emit carbon into the air. This is a grave responsibility. Government, and in fact all of us who live in Scotland, must be brought to recognise the consequences of our actions and inactions. There are countries where crop failure is reality, where the sea is already at their front doors and communities are displaced. From this perspective, 2045 seems unacceptably late. It must not be regarded as acceptable. If it is the best we can do, it is a tragedy. Government must do "everything, all the time, everywhere" and demand that its citizens do the same. How can we bear to do anything less?

The targets: the proposed change is from having an annual target percentage reduction in carbon emissions from the 1990 baseline to a budget (or allowance) for carbon emissions for five-year periods. The end goal remains "net-zero" carbon emissions by the year 2045. A target percentage reduction implies an underlying carbon budget and vice-versa. One might say it is just presentational change. The annual targets were a broad arithmetical construct rather than giving specific guidance on a pathway for particular sectors: up to 2030 the targeted additional annual reduction alternated between 2.6% and 2.7% until we reached 75% in 2030; from 2030 the annual reduction was 1.5% until we reached 90% in 2040; then it was 2% extra per annum to get to 100% in 2045. Carbon budgets similarly operate at this high-level ambition, because their achievement is not in the direct control of Government but is dependent on the actions taken by specific industries and sectors, and the population, in response to Government regulations.

While the 2023 targets were missed by 3.8%, the targets have been effective in leading action which reduced Scotland's emissions by 50% from the 1990 baseline. The Climate Change Committee (CCC) has advised that there is no credible path to reach the 75% reduction by 2030 as required by law and so the Government cannot produce a credible Climate Change Plan. The inevitable reporting time lag sharpens the problem. The Government only had 5 years to implement corrective action. A reset is required. The targets and monitoring system did their job in that they have forced this corrective re-think by Government in a very public way.

Targets/carbon budgets are insufficient in and of themselves. It is legislation and action we need: to state the obvious, new terminology and methodology alone won't solve the problem. Parliament should demand and ensure the change is implemented quickly, and not spend too long scrutinising what is basically a management tool set in law. For example, a focus on action would lead to the speedy passage of the Heat in Buildings Bill.

ADVANTAGES OF THE MOVE TO FIVE-YEARLY BUDGETS

Consistency with the UK: Scotland needs certain changes which can only be enacted by the UK Government. The two Governments must work together. Using the 5 yearly carbon budget approach has the advantage of allowing consistency with the approach of the UK and Welsh governments. However, Scotland must be careful that its budgets are set in accordance with the CCC's recommended pathway to net zero by 2045 at the latest, which is more ambitious than the UK's net-zero target of 2050 at the latest. The CCC has advised that 2045 is a realistic ambition for Scotland and given the urgency of the climate crisis, we must not let this lapse.

Smoothing: the reduction in carbon emissions has not, in practice, conformed to a smooth line-graph. For example, there have been harsher or milder winters impacting heating emissions, and the Covid-19 pandemic resulted in an anomalously low year for carbon emissions. Annual targets are particularly at the mercy of these normal ups and downs. 5-year figures should mitigate that to an extent.

Clarity: having a budget for actual carbon emissions has the potential to help to sharpen focus on urgent climate action if used well in public by the Scottish Government. It can be explained, for example, that domestic transport accounts for x million emissions and cutting it by 20% is a significant contribution to the end goal.

A change to budgets also provides the opportunity to highlight the meaning of the "net" in "net-zero", if we express the budget as showing both the amount of emissions emitted, and the amount of emissions captured. There seems to be a huge reliance on CCUS to do the job for us in achieving net-zero and yet CCUS is far from proven at scale (see <https://zerocarbon-analytics.org/archives/energy/a-closer-look-at-ccs-problems-and-potential> which shares that the International Energy Agency states "removing carbon from the atmosphere is costly and uncertain [...] so far, the history of CCUS has largely been one of unmet expectations. Progress has been slow and deployment relatively flat for years"). Hopes and assumptions about CCUS should be recorded transparently in the carbon budgets as well as the climate change plan. Given how elusive and expensive attempts have been to date to develop CCUS, the less we rely on CCUS the better. The carbon budgets should be used to bring this hidden but fundamental detail to the public eye.

POTENTIAL DISADVANTAGES OF THE MOVE TO FIVE-YEARLY BUDGETS

5-year budgets must not reduce frequency of progress monitoring: there is a potential disadvantage that reporting on progress would be constrained to a 5-yearly rather than annual cycle. So close to the 2045 end-goal, this would be inappropriate as it would not allow adequate time to correct where we are off-track in the early years of each budget cycle. Therefore, there should be annual accountability mechanisms such as progress reports and statements to Parliament by Ministers. This needs to include a continuation of the CCC's annual Progress Reports to Parliament - and similar annual responses by Government as to the actions being taken to address any recommendations. The reports and responses should also include an assessment of the steps taken to ensure that emissions reductions are fair (that is, socially equitable) as well as the co-benefits (including warmer homes, cheaper energy, improved health and a more sustainable economy) secured. The Climate Change Plan (CCP) should also have a section comparing the Scottish carbon budgets and progress towards them against the previous interim targets.

It will be important for the NZET committee – and wider Parliament – to understand the proposed ‘shape’ of the reductions within the 5-year budget period: if plotted, would we see a straight line over the five years? Or a parabola? This will allow an assessment of whether actions are off-track, even towards the start of the budget period.

We have a strong concern for climate justice in a broader sense than a domestic just transition, and so we fully support the Scottish Government’s action on loss and damage. We would like to see reports designed to include updates on progress with the Loss and Damage Fund implementation to make it clear the Scottish climate action is part of a global necessity.

Please provide your response in the box provided.:

The disadvantage of retaining the current annual target system would be that the Scottish Government has so far largely failed to take sufficient actions to comply with it, risking it having little credibility. The CCC’s 2023 report found that Scotland’s annual target was missed again, underlining that the annual target has now been missed in eight of the past twelve years.

The advantage would be a more granular measure of where we are at, with precise details of where we should be. This advantage could be retained if the CCP had a section comparing the Scottish carbon budgets and progress towards them against the previous interim targets.

2 What are your views on the advantages and disadvantages of carbon budgets / targets being expressed as a percentage reduction or as absolute levels of emissions?

Please provide your response in the box provided.:

Our testimony to truth leads us to advocate for clarity and honesty in how we measure progress. While percentage reductions provide a clear sense of progress, absolute levels are what ultimately matter for the Earth’s climate. We recommend using both methods in parallel - percentage targets to clearly communicate ambition, backed by absolute emissions figures to show real-world impact. In fact, reporting to the UK Government does this, showing that the approach could also be adopted by the Scottish Government.

3 The Climate Change Committee (CCC) suggested that the Scottish Government should consider aligning the proposed 5 yearly carbon budgets with the periods that are used for UK carbon budgets (i.e. 2023-27, 2028 – 32, 2033-2037 and 2038-42). What are the advantages and disadvantages of alignment with UK carbon budget periods?

Please provide your response in the box provided.:

The advantage of aligning with the UK carbon budget periods is that it could foster better coordination; and would make it easier for the CCC to have a picture of the progress on emissions reductions across the whole of the UK. It seems to make sense to align the periods given the responsibility of the two governments for reserved and devolved matters, which both influence the success or otherwise of emissions reduction policies.

There are, however, potential disadvantages that would require mitigation.

First, the next carbon budget is not due to start until 2028. An initial, shorter carbon budget period would need to be produced in the interim, and actions taken beyond those announced by Scottish Government in April 2024 which fall short of what is needed. A draft CCP was, previously, expected in November 2023 but has been delayed. Scotland is therefore currently lacking a comprehensive strategy that outlines the actions and policies required to achieve the 2030 target.

Secondly, the UK is targeting to reach net-zero by 2050, 5 years behind Scotland. If we are to align with the UK budget periods, the Bill should contain explicit provisions allowing Scotland to move faster and set more ambitious targets than the UK if needed. The CCC should give options of more ‘stretching’ pathways to allow the Scottish Government to seek to achieve net zero before 2045. The Scottish Government has restated its commitment to the 2045 net-zero target, and must be held to it. Any perceived backing away from commitments to achieve net zero by 2045 (or making the final stages of the trajectory more difficult by delays to early action) would result in significant reputational damage for Scotland. This is especially the case given the statements made at COP26 and elsewhere on reducing emissions as a contribution to climate justice for poorer countries facing mounting losses and damages.

4 At the end of a carbon budget period, there can be a surplus or deficit of emissions reductions. What do you think the legislation should say about how future surplus or deficits in emission reductions are dealt with?

Please provide your response in the box provided.:

As Quakers, our testimonies to sustainability and equality compel us to think of future generations and global climate justice. We strongly oppose any “carry forward” of surpluses, as this could incentivise delays in urgent action. Conversely, deficits should trigger immediate, transparent corrective action plans. The focus must be on cumulative emissions reductions to truly address the climate emergency. The Bill should retain a provision to require Scottish Ministers to report on action being taken should there be a deficit of emissions reductions, and should require the Scottish Ministers to set out how they will make up that deficit – on top of whatever reduction would, by then, already have been set for the subsequent 5-year period.

We note that while a “carry-forward” mechanism for surplus reductions does exist within the UK carbon budget system, the UK Government has recently decided not to use it – and the CCC has advised that such mechanisms are unnecessary.

We believe that the budget-setting process established by the Bill must demonstrate an intent to drive up climate ambition in such a way that achieving “stretch targets” is still pursued. This would mirror the “ratchet mechanism” of the Paris Agreement which pursues exponential national contributions to global climate efforts over time, and recognises Scotland’s historic contribution to the climate crisis.

Part One – Carbon budgets

5 Should the Scottish Government wait for the planned advice on the UK's seventh carbon budget from the CCC, before setting their carbon budgets?

Please provide your response in the box provided.:

It is important that the Scottish Government take advice from the CCC on setting its carbon budgets, and this waiting approach makes sense if the budget periods are to be aligned. However, it is also important that Scotland does not lose what momentum it has on climate action. The Scottish Ministers should not wait for the advice before progressing delivery of actions, including those in the existing CCP/CCPu, the forthcoming action plan on reducing car-km, and the Heat in Buildings Bill amongst other actions. The sooner we act, the less carbon will be released overall.

Please provide your response in the box provided.:

If the CCC is able to give scientific advice corresponding to multiple 5-year carbon budgets in 2025, then it makes sense for the Scottish Government to set the budget timelines for the next 17 years to give greater clarity to the public and the private sector about the trajectory of travel. This allows people and businesses to plan accordingly. It also helps to ensure a realistic plan rather than pushing back harder decisions to a later timeframe.

As stated above, if desired to fit with the UK budget timelines, then the bill will need to set out how the 'transitional years' of 2025-27 will be addressed; as well as the plan for 2043-45.

Please provide your response in the box provided.:

The carbon budgets – and Climate Change Plan to meet them – should be proposed as soon as possible after receiving advice from the CCC. We were originally expecting to examine the draft CCP in November 2023. There has been too much delay at a crucial time for climate action. We urgently need Parliament to agree a comprehensive suite of policies that would accelerate emissions reductions across the economy before 2030.

Please provide your response in the box provided.:

Part Two – Climate Change Plan

6 Do you have views on when and how the Scottish Government should publish their plans for meeting the proposed carbon budgets?

Please provide your response in the box provided.:

The next CCP should be produced as soon as possible after the first carbon budget has been set. This plan must set out costed policies and proposals that will ensure that emissions are (at a minimum) reduced in line with that budget.

Please provide your response in the box provided.:

Given the need for parliamentary and public/civil society scrutiny of the draft plan once it is produced, it is unrealistic to suggest that it could retain the 2025-2040 period originally envisaged. However, there remains an urgent need to set out the actions that will be taken to meet our emissions reductions targets. If the UK carbon budget dates are adopted for Scotland, then it would make sense for the next CCP to start as soon as possible and to cover the period up to 2042; but for there to be a requirement for the CCP to be reviewed in line with the 5-year budgets.

Please provide your response in the box provided.:

Please provide your response in the box provided.:

Part Three: Monitoring and reporting

7 What are your views on whether there should be changes to the existing Scottish Government monitoring and reporting framework?

Please provide your response in the box provided.:

We are happy with the Scottish Government's confirmation that annual reporting on progress towards targets will be retained. This is important to ensure transparency and showing the importance of these budgets. It is essential that this continues to avoid progress plateauing, and to ensure that each year we remain on target to meet or exceed the 5-year budget.

Please provide your response in the box provided.:

We believe this would be a negative step. The impartial advice of the CCC is valued and it is important that they continue to make annual progress reports in these crucial next 20 years so that we can reach our climate targets. The Scottish Ministers should also continue to make annual responses as to the actions being taken to address any recommendations. Annual progress reports from both Scottish Government and CCC must be maintained to ensure consistent pressure for action and allow for timely course corrections.

Part Three: Monitoring and reporting

8 The 2045 target will not be amended. How much do you estimate it would cost to achieve that target?

Please provide your response in the box provided.:

Quakers in Scotland do not have the expertise to estimate in detail the costs of reaching net zero. In considering the reports of entities such as the Scottish Fiscal Commission on the costs of climate change action, the Scottish Parliament must bear in mind the cost of doing too little, or nothing, which risks reliance on imported oil and gas and further damage from changing weather patterns.

Please provide your response in the box provided.:

Current spending levels are inadequate to meet the challenge of the climate crisis. It is essential that all money spent by the Scottish Government contributes in some way to meeting our climate goals. For example: Scottish Enterprise budgets should be used to advance manufacturing components needed to reach net zero goals; Skills Development Scotland should prioritise training for the jobs we need for the future such as heat pump engineers and insulation installers; and public procurement rules should be changed to ensure that local authority budgets are spent on local, sustainable producers. Ultimately, while there is a cost to mitigate the climate crisis, this is nothing compared to the costs of failure to mitigate, both for our country in terms of rising sea levels and changing weather patterns, and around the world in terms of famine and flood.

One key international principle that could be included in the new legislation, and embedded in future policies, is the "polluter pays principle". This would recognise the need to fairly finance climate change policies and protect those on low incomes from disproportionate costs, so as to ensure the social equity of costs and benefits. There could also be additional sources of funding in line with these principles, e.g. an Air Departure Tax. See Stop Climate Chaos Scotland's report on Financing Climate Justice for further ideas about this - https://www.stopclimatechaos.scot/wp-content/uploads/2022/09/FinancingClimateJustice_Report_ONLINE.pdf.

Budget

How can the Scottish Government use this year's Budget to ensure all portfolio areas are focused on achieving the 2045 target?

Please provide your response in the box provided.:

The Scottish Government could implement a climate impact assessment for every budget line item, not just as an overall addendum. Consideration should be given to setting specific emissions reduction targets for each portfolio, fostering accountability.

In this year's budget specifically, the Scottish Government could take the following steps:

(1) Commit to using a 'polluter pays' approach to identify new and additional sources of finance which could accelerate emissions reduction in Scotland as well as financing Scotland's international climate justice contributions.

(2) Increase its policy and financial contributions to international climate justice, including to address climate-induced loss and damage. As those who have historically had the highest emissions, we should make a long-term financial commitment to address the loss and damage suffered by low-income, climate-impacted communities.

(3) Provide clarity that funding will be available to support the necessary transitions in both heat in buildings and transportation. Revenue for this must be raised fairly – see the fiscal measures report and manifesto of Stop Climate Chaos Scotland for ideas on how to achieve this.

Please provide your response in the box provided.:

It is important to have a Climate Change Assessment of the Budget, showing integrity and the overarching urgency of the climate crisis across all areas of government. However, the impact so far seems to have been limited: Scotland has continued to miss its emissions targets. The assessment needs to be more than a reporting exercise: it should drive real change in budget allocations and policy priorities.

Please provide your response in the box provided.:

Our aims in considering this question focus on simplicity, truth and integrity. In recognition of the importance of spending money in accordance with climate goals, overall, the assessment should be more prominent and accessible, not just an appendix. There should be a clearer, more visual representation of how each budget area contributes to or hinders emissions reductions.

The 'neutral' category is confusing and could be better divided. For example, healthcare spending is the largest 'neutral' spend in both capital and resource programme areas. However, healthcare is not inherently neutral. Depending on choices made, health care can have greater or lesser carbon impact: e.g. certain inhalers are much more polluting than others, and certain anaesthetics have a huge carbon impact. This could be better reflected in the Climate Change Assessment.