



The Church of Scotland

Church and Society Council

## Official Response

**SUBJECT:** Climate Change Bill  
**REQUESTED BY:** The Scottish Government  
**REFERENCE:** OR-2017/13  
**DATE:** 21 September 2017  
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The Climate Change (Scotland) Act 2009 set greenhouse gas emissions reduction targets, including a target to reduce emissions from 1990 levels by 80% by 2050. The Scottish Government intends to introduce a new Climate Change Bill with more ambitious targets. The Church of Scotland welcomes the proposed legislation and joins with other organisations in Stop Climate Chaos Scotland to call upon the Scottish Government and others in Scotland to take this opportunity to help make Scotland a low carbon economy. The Church of Scotland believes that this is one of the changes necessary to make Scotland a fairer, more equal and more just nation in a fairer, more equal and more just world.

The Paris climate agreement of 2015 shifted the direction of policy globally towards a low carbon future. In its response to the agreement the UK Committee on Climate Change concluded that net emissions of greenhouse gases will need to fall quickly to meet the Paris targets:

*Emissions pathways indicate that CO<sub>2</sub> emissions will need to reach net zero by the 2050s-70s, along with deep reductions of all other greenhouse gases, in order to stay below 2°C. To stay close to 1.5°C CO<sub>2</sub> emissions would need to reach net zero by the 2040s.<sup>1</sup>*

The significance of this short comment can hardly be overstated. In order to meet the Paris targets, Scotland and other industrial countries around the world *will have to reduce their net emissions of greenhouse gases to zero*. It is therefore right for the Scottish Government to take this opportunity to set new and ambitious targets for decarbonising the Scottish economy.

### Questions

**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, but a net 100% target would be preferable.

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<sup>1</sup> UK climate action following the Paris Agreement, Committee on Climate Change, 2016, p.9.

Scotland has made impressive progress in reducing greenhouse gas emissions since the 2009 Act. Targets that were previously thought to be unattainable, such as meeting an interim target of a 43% reduction by 2020 have already been exceeded. Stop Climate Chaos Scotland have called for the Scottish Government to set a net target of 100% by 2050, a target adopted from the Fair Shares report of 2015.<sup>2</sup> At present this target might appear very difficult to achieve but with rapid decarbonisation of the economy envisaged in the draft Scottish Energy Strategy there is no reason to dismiss it. The Scottish Government could make this commitment and set a global standard for others to follow.

**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?**

Yes

As set out above a net zero greenhouse gas emission target is consistent with the ambition of the draft Scottish Energy Strategy and with the targets set by the Paris agreement and would be a world leading commitment. For these reasons we suggest the Scottish Government adopts a net zero greenhouse gas emission target.

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

Yes. Given the proximity of the date this seems to be an appropriate target.

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

No, the target should be at least 77%.

To make rapid progress a more ambitious target would be better. In the 2009 Act the Scottish Government set an interim target of reducing emissions by 42% by 2020. This target was adopted following lobbying from members of Stop Climate Chaos Scotland, including the Church of Scotland, and when first proposed was met with resistance from Scottish Government ministers who, following advice from civil servants, believed that it would be impossible to achieve. Such reservations were overcome in parliamentary debate and the 42% target was adopted. The eventual outcome was surprising and encouraging. Decarbonisation of the Scottish economy has made more rapid progress than was ever thought possible and the target was achieved in 2016, four years before the 2020 deadline.

From this we conclude that it is important to set a challenging target even if the means to achieve the target are not yet in place. Rising to the challenge is both an act of faith and a stimulus to innovation.

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<sup>2</sup> Fair Shares: A civil society equity review of INDCs, October 2015.

[https://www.oxfam.org/sites/www.oxfam.org/files/file\\_attachments/ib-civil-society-review-climate-indcs-191015-en\\_2.pdf](https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/ib-civil-society-review-climate-indcs-191015-en_2.pdf)

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

No, the target should be at least 90% by 2040.

For reasons given above we believe the Scottish Government should aim for a more ambitious figure.

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

No comment.

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

Yes.

As suggested by the UK Climate Change Committee, annual targets are useful and now widely accepted by stakeholders in Scotland so they should continue under the new legislation. Annual targets help keep the issue in the public mind and promote debate. It is much easier and more immediate to relate to an annual target than it is to relate to a more distant future target.

**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?**

No comment.

**7. a) 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?**

The UK Committee on Climate Change provides impartial and well-founded advice to the UK and Scottish Governments so it makes sense to take advice from the committee and make adjustments as appropriate.

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

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

See below.

**b) What are your views on the length of time that future Climate Change Plans should cover?**

See below.

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

With reference to 8 a) to 8 c) the Paris climate agreement set out clear and unambiguous targets that are the foundation for national targets and action. The UK Climate Change Committee, in its advice to the Scottish Government, reported on the impact of these targets and the steps now being taken by national and regional governments elsewhere to align with them.<sup>3</sup> One of the most important elements of the Paris agreement was to set up five yearly reviews and it would make sense to align the Scottish climate change plans with these reviews. This should encourage international comparison and exchange of experience.

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

No comment.

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

No comment.

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

A principal concern of the Church of Scotland is to promote climate justice, both in Scotland and around the world. The transition to a low carbon economy must not be to the detriment of those living in poverty; rather the reverse, it should be an opportunity to rethink the economy in a way that reduces inequality, both globally and in Scotland. We have set out our arguments in response to the draft Scottish Energy Strategy where we focussed on the need to address fuel poverty and climate change together and to ensure that the two policies support each other rather than coming into conflict. Addressing the complex policy issues raised by this challenge goes beyond the scope of this consultation, but it should be borne in mind when setting any targets from greenhouse gas emissions.

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

The transition to a low carbon economy is a huge challenge but offers opportunities for new businesses in the renewable energy and other sectors. The Scottish Government has sought to take advantage of this for example by making Scotland a centre of marine renewable technology. Many of the challenges in moving to a low carbon economy are generic so we can learn from others elsewhere in the world and share our experiences. For example, national and regional governments in Germany have substantial experience in promoting low carbon housing, including the

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<sup>3</sup> Ibid, P.29.

development of 'passivhaus' standards that would help achieve net zero carbon emissions from housing in Scotland. We could learn from this experience to encourage new business opportunities in refitting Scotland's existing housing stock to make it much more fuel efficient, reducing energy use and addressing fuel poverty.

Perhaps the biggest challenge for Scotland will be to move away from its dependence on North Sea oil and gas. This industry is already experiencing decline and it is important to support communities directly affected by this transition as we move towards renewable energy sources.

**12. a) 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).**

The Environmental Report draws on the main sources of evidence currently available.

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

The Environmental Report gives a good account of the risks associated with climate change.

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

The Environmental Report covers the main risks adequately.

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

Yes.

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

No comment.

**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.**

No further comments.