



Stop Climate Chaos Scotland briefing in advance of the stage 1 debate on the Climate Change (Emissions Reduction Targets) (Scotland) Bill

October 2024

Introduction

[Stop Climate Chaos Scotland](#) (SCCS) has shared views on the Climate Change (Emission Reduction Targets) (Scotland) Bill via our [submission to the pre-legislative scrutiny by the Net Zero, Energy and Transport Committee](#), and on the climate action needed to help to ensure Scotland meets its emissions reduction targets and regains some leadership on action to address climate change, champion climate justice, and deliver co-benefits for health, wellbeing, jobs and tackling inequality in our [proposals for the Programme for Government 2024/25](#).

This briefing sets out the coalition's views on the Bill and wider context, and suggests issues or questions that might be raised in the stage 1 debate, scheduled for Thursday 10th October. It takes into account and reflects on [the stage 1 report](#) produced by the Net Zero, Energy and Transport Committee (NZET Committee).

Context

From devastating droughts to catastrophic floods, the impact of the spiralling climate crisis could not be clearer, and those with the least responsibility for causing rising global temperatures are facing the most severe - and deadly - consequences.

Scotland has been a global climate leader. When our 2009 Climate Change Act first set targets for emissions' reductions, they were "world-leading" – and this was sustained by the 2019 Act's amendments, which set rightly ambitious targets, based on our historic responsibility, the science, and public mandate.

However, on 18 April 2024, [the Cabinet Secretary responded](#) to the Climate Change Committee's latest advice, announcing a proposal to revise the targets framework and seeking to reinvigorate action. Our [analysis of the measures announced](#) indicates that they lack ambition and much additional effort is needed to get anywhere near to delivering the emission reductions needed.

Then, on 18 June 2024, [official statistics for emissions in 2022](#) revealed that the annual target for reductions was missed again – meaning that **Scotland has now missed its targets in nine of the past thirteen years**. On the following day, the [Cabinet Secretary's statement](#) confirmed that the Government's "legislative proposals on a new emissions reduction framework will include establishing five-yearly carbon budgets"; and that "the bill is introduced as soon as possible after recess". The statement also listed a number of welcome achievements, contributing to the 50% reduction in emissions since 1990, and reiterated the commitment to achieve Net Zero by 2045. However, it was disappointingly light on new proposals for meaningful action to ensure that emissions reductions get back on track and that the future budgets and 2045 target can be achieved.

The circumstances giving rise to the need for this legislation are deeply unfortunate. We note that the NZET Committee appear to agree stating that "it is deeply regrettable that the catalyst for the Bill's introduction was recognition that a key statutory milestone on the journey to net zero was no longer achievable". As SCCS and many others would argue, this situation has arisen due to inadequate delivery by the Scottish Government and others. The latest [CCC Report to Parliament on Progress in Reducing Emissions in Scotland](#) sets out the current situation very well and highlights that:

- **Current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act.** The CCC identifies risks in all devolved policy areas - transport, buildings, agriculture, land use and waste. The CCC did, however, welcome policy actions and proposals related to heating but sought a clearer timeline for the Heat in Buildings Bill.



- **The Scottish Government has delayed its draft Climate Change Plan.** A draft CCP was, previously, expected in November 2023 but has been delayed. Scotland is therefore lacking a comprehensive strategy that outlines the actions and policies required to achieve the 2030 target.
- **Most key indicators of delivery progress are off track**, with tree planting and peatland restoration rates, heat pump installations and community energy, electric van sales and recycling rates significantly so.

SCCS views on the switch to carbon budgets

Based on the context above, it is important therefore, that the Scottish Government acknowledges why “**we are where we are**”. While the recent changes to UK Government policy and the overall fiscal challenges (largely a consequence of UK Government policy) are undoubtedly a part of this explanation, they are not the only reasons. It must therefore be fully recognised that delays to and inadequate delivery of Scottish Government policies have been a major contributory factor. For instance, following the Heat in Buildings strategy, it was three years before the consultation on proposed legislation (which, itself, is yet to be introduced). Similarly, following its announcement three years ago, the route map for a 20% reduction in car-km is yet to be published - and the current commitment is for publication “[by autumn 2024](#)”.

Thus, it is vital that – as well as the measures to be addressed by this Bill - **parallel steps are taken to significantly improve delivery** in devolved areas. For instance, it is imperative that the Scottish Government proceeds, as soon as possible, with its planned Heat in Buildings Bill (as praised by the CCC). In addition, more actions are needed in the areas of transport, buildings, agriculture, land use and waste.

SCCS does not have strong views about whether a targets or budgets system should be used, as there are pros and cons to each - but however emissions are measured is **meaningless without action**. In this regard, we welcome the conclusions of the NZET Committee that there is a “*need for urgency. This requires a new climate change plan, setting out credible, deliverable, detailed and costed proposals to meet the new carbon budget target, to be in place as soon as reasonably possible before the end of this parliamentary session to allow for sufficient scrutiny.*”

We are pleased to note that the Bill appears to be very narrowly drawn and addresses only the issues of establishing a carbon budget approach and a new timetable for the CCP, and thus SCCS believes that the Parliament should move swiftly to agree to its provisions.

It is also important that the process is not subject to more or undue delay. In particular, **all efforts must be made to present the draft of the next CCP to Parliament by the summer of 2025** - otherwise, there is risk that, following Parliamentary scrutiny, there will be no time for consideration of Parliament’s recommendations and subsequent amendments to the draft plan before Parliament is dissolved for the 2026 election. This happened to the last CCP update in 2020/21 and has, no doubt, contributed to targets being missed and this bill becoming necessary. It is important therefore to ensure that a re-occurrence of such a situation is avoided. In this regard, we welcome [the Acting Cabinet Secretary’s indication](#), provided to the NZET Committee during its stage 1 consideration, of the Scottish Government’s intention (subject to the timing of initial CCC advice) to publish a draft CCP prior to the summer recess in 2025. Nevertheless, amendments to the Bill and/or further clarity from the Scottish Government might be desirable to ensure that no further delays occur.

Finally, of course, it should be remembered that we face a climate *emergency*. As such, **there is no need to wait until a new CCP in 2025/26 to take action**. The existing CCP/CCPu includes actions that have yet to be taken or measures that need further investment, and the Scottish Government announced [efforts to accelerate action on 18 April 2024](#), when this bill was first formally proposed. There remains a need for more and faster action both now, in the months to come, and in the new CCP, and the Scottish parliament should challenge the Scottish Government to demonstrate that such action is being taken.



Issues/questions to raise/ask in debate:

In the light of the above, **Members may wish to raise concerns or ask questions on the following matters:**

- To agree that “we are where we are” due to inadequate or delayed action by both UK and Scottish Governments, leading to the recent run of missed targets and therefore the need for this Bill.
- To set out what steps they are taking to accelerate action, in advance of the new CCP and in addition to the recycled package included in the [s36 report](#). In particular, given the importance of the key sectors where emissions reductions need to be delivered, Members might wish to ask:
 - when the Rural Support Plan, setting out plans for agricultural reform and funding for emissions reductions in that sector, will be published?
 - when the expected Action Plan to reduce car-km by 20%, first promised in 2021’s CCPu, will be published?
 - when the Heat in Buildings Bill will be introduced?
 - when the final Energy Strategy and Just Transition Plan will be published, and what is being done to ensure that the 2GW Community and Local Energy target is met in 2030 after the 1GW target was missed in 2020?
- To commit to setting budgets in accordance with the advice from the CCC, unless there are exceptional circumstances, and whether they would support amending “have regard to” to a more certain duty.
- To provide further clarity on the timetable expected for the setting of the first carbon budgets and, thereafter, the next CCP; and whether, given the need for greater clarity/urgency, whether they would bring forward or support amendments to put greater clarity and certainty regarding the timetable on the face of the bill.

About Stop Climate Chaos Scotland:

- [Stop Climate Chaos Scotland](#) (SCCS) is a diverse coalition of over 70 organisations campaigning together on climate change.
- We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of action to limit temperature rises to 1.5 degrees and supporting climate justice around the world.
- Our coalition members range from environment, faith and development organisations to trade and student unions and community groups.
- Our work is led by our members and is normally focussed on lobbying decision makers in Scotland, but we also work on UK-wide campaigns when appropriate with our sister organisations in England (The Climate Coalition) and Wales (Stop Climate Chaos Cymru).