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STAGE 1 DEBATE: CLIMATE CHANGE (EMISSIONS REDUCTIONS TARGETS) (SCOTLAND) BILL

WWF Scotland Briefing – 8 October 2024

SUMMARY

- **This Bill must be a wakeup call for the Scottish Government to step up delivery in key policy areas such as renewable heat and agriculture to set these sectors up to play their part in reaching the 2045 net zero target.**
- There should be no further weakening of ambition and 2045 target year for net zero.
- The Scottish Government should seek to set carbon budgets according to UK Committee on Climate Change advice and this must be clear on the face of the Bill.
- A timetable to produce the Climate Change Plan must be set on the face of the Bill.
- The UK Committee on Climate Change has already warned of the need to avoid a vacuum of action and ambition in relation to climate change.

WWF Scotland wants to see no further weakening of ambition and 2045 target year for net zero.

- WWF Scotland welcomes the clarity that 2045 remains the ambition of the Scottish Government and would like the Scottish Government to be clear about its responsibility in missing the 2030 target.
- We must not lose sight that we are in a climate and nature emergency and tackling these requires ambitious action.
- The UK CCC advised that the Scottish Government must meet the 75% emissions reductions target as soon as practically possible: *‘the Scottish Government should build on its high ambition and implement policies that enable the 75% emissions reduction target to be achieved at the earliest date possible.’*¹
- The Scottish Parliament should continue to hold the Government to account over this target that recognises Scotland’s historical contribution to climate change.
- The Bill must ensure that that Scottish Government should set the new carbon budgets to the UK Climate Change Committee’s (UK CCC) recommended pathway to net zero by 2045, expected in spring 2025.
- WWF Scotland supports the Net Zero Committee’s Stage 1 Report² recommendation 10 which seeks the inclusion of a deadline for laying the regulations to set carbon budgets on the face of the Bill.
- The move to carbon budgets represents a lowering of ambition as the move is a result of the UK CCC advising the Scottish Government the 2030 target will be missed. Therefore, it is possible that the carbon budgets will see Scotland emit more cumulative emissions on the route to net zero, placing more burden on other

¹ <https://www.theccc.org.uk/wp-content/uploads/2024/03/Progress-in-reducing-emissions-in-Scotland-2023-Report-to-Parliament.pdf>

² [Net Zero, Energy and Transport Committee: Stage 1 report on the Climate Change \(Emissions Reduction Targets\) \(Scotland\) Bill](#)

countries to act if we are to limit global warming to the safe threshold of 1.5°C as per the Paris Agreement. To make up for this deficit, the Scottish Government should aim to exceed the new budgets.

A timetable to produce the Climate Change Plan must be set on the face of the Bill.

- The UK CCC have already warned of a vacuum of ambition around net zero in a letter to the Scottish Government from May 2024³.
- There is currently no timetable for the production of the Climate Change Plan following the passage of this legislation. The Bill currently requires a Plan 'as soon as practicable' after the first regulations setting a Scottish carbon budget come into force.
- We support the Net Zero Committee Stage 1 Report recommendation 5 for a draft Climate Change Plan to be published alongside the carbon budget regulations. Alongside this, we consider that, at Stage 2, the Net Zero Committee should seek clarification from the Scottish Government on the timetable for the publication of final Climate Change Plan.
- Policy action does not need to wait for a new Climate Change Plan to be set and there are key actions which government such as the development and publication of the Rural Support Plan, clarity on the distribution of agricultural payments, the introduction of the Heat in Buildings Bill and the Natural Environment Bill.

The retention of annual accountability mechanism is vital.

- A strength of the current 2019 Climate Change Act is the requirement for annual accountability which allows scrutiny of progress with policies in the Climate Change Plan and against emissions targets.
- With a move to carbon budgets, elements of annual accountability could be lost and therefore the process and ability of parliament and society to scrutinise progress would be less transparent and effective. The Bill retains annual accountability – annual reports on progress against the Climate Change Plan and reporting on greenhouse gas emissions. Annual reporting on progress to the Scottish Parliament should continue to provide a vital point for scrutiny, transparency and an annual check on progress on emissions reduction, especially as 'results' from carbon budgets will not be visible for five years.

No carry over mechanism has been introduced which is an improvement on UK climate change legislation.

- The UK Climate Change Act and carbon budgets provide a mechanism by which over-performance in one carbon budget can be 'carried forward' to count as part of the next carbon budget. Although the provision has not yet been used, in spring 2024 it was under active consideration by the UK Government, given its overperformance against carbon budget three between 2018 and 2023. This overperformance was due to external factors rather than good policy progress.
- A carry forward mechanism at the Scotland level would allow for further lowering of ambition on the basis carbon budgets already represent a significantly reduced ambition for Scotland's climate action and any over-performance should help reduce this 'debt' from current missed targets rather than helping reduce ambition in future budgets.
- Therefore, a carry forward mechanism must be included in this Bill.

Function to review legislated carbon budget levels by the UK CCC has been introduced.

- Carbon budgets can be more reflective of the real world context of how emissions reductions happen i.e. it is not always a linear process, but a limitation is that sometimes the budgets can be made easier to meet due to external factors rather than policy action. These external factors can include financial recessions and pandemics.
- As such we believe that the level of Scotland's carbon budgets should be open for reviews by the UK CCC under specific circumstances (such as unforeseen external events), with a view to both tightening when

³ <https://www.theccc.org.uk/wp-content/uploads/2024/05/Letter-to-Mairi-McAllan-MSP-CCC-Scotland-carbon-budgets.pdf>

external factors rather than policy action have made them easier to meet. They should also reflect the current existing provisions for revision within the UK Act (significant developments in the scientific knowledge about climate change, or significant developments in European or international law or policy, or the inclusion of additional GHGs within the carbon budget emissions accounting system).

- In the Bill as currently set out, safeguards are in place e.g. the review is carried out by the CCC and any changes made only where the UK CCC advises to do so, to protect against any weakening of ambition for short term gain (as has been the case with the UK Government in the past e.g. the review of the 4th carbon budget).
- The inclusion of this function to review carbon budget levels is welcomed (section 2(5) of the Bill).

Moving swiftly to action and delivery.

- There are a number of upcoming policy actions and legislation which the Scottish Government must progress without delay, alongside the development of the legal framework. This is to avoid finding ourselves in a similar situation by the time the first carbon budget has to be met.
- Key areas of focus for WWF Scotland, due to their potential to contribute to emissions reductions and nature recovery, are a robust Heat in Buildings Bill, a fairer distribution of the existing agriculture budget to move more funding into practices which lower emissions and help recover nature, consulting on and publishing the Rural Support Plan and the introduction of ambitious statutory targets for nature recovery in the Natural Environment Bill. The Parliament should continue to challenge government on these areas to ensure these are delivered before summer 2025.

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