

CIWM Scotland Centre Consultation Response

June 2017

Scottish Government - Consultation on Climate Change Bill.

The Chartered Institution of Wastes Management (CIWM) is the professional body which represents over 6,000 waste management professionals, predominantly in the UK but also overseas. The CIWM sets the professional standards for individuals working in the waste management sector and has various grades of membership determined by education, qualification and experience.

The Scottish Centre Council of the Chartered Institution of Wastes Management welcomes the opportunity of contributing to Scottish Government consultation on the Climate Change Bill.

CIWM is recognised as the foremost professional body representing the complete spectrum of the waste and resources sector. This gives the Institution the widest possible view and, perhaps more pertinently, an objective rather than partial view, given that our goal is for improvement in the management of all wastes and resources.

We offer the comments based on the extensive experience of a number of our senior members.

Question 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?

No

(please explain your answer)

Given that the CCC's advice is that this option is at the 'very limit of feasibility' (without taking into account the impact that Brexit could have on resources, funding and UK-wide policy) and on the basis that there are other related policy agendas (including the circular economy) which will require attention in order for the Scottish Government's wider strategic aims to be met, the more flexible option proposed by the CCC (to keep the 80% by 2050 target with review mechanisms built in) would be preferable. From the perspective of the waste sector, the significant reductions which have been made to date will stagnate to some extent pending certainty on other waste management policy (such as how the potential capacity gap for residual waste following the 2021 biodegradable landfill ban being introduced will be addressed).

Question 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

(please explain your answer)

The provision will not limit or restrict the setting of future targets. CIWM Scotland acknowledge that there is more to do and that, allowing reviews ahead of setting a target at a later date when more information is available, ensures that the end target of net-zero emissions is not forgotten.

Question 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

(please explain your answer)

Significant work will be required in the very short term by the Scottish Government to bring in the policy and/or legislative measures to enable this reduced target by 2020. However, CIWM Scotland agrees that the target should be amended to take account of updated information. To date, the Scottish Government and its partners have successfully reduced emissions with the latest emission statistics published in June 2017 confirming achievement of Scotland's annual target for the second successive year, and progress that is well on track to meet the world leading 2020 target. If this performance continues, it should see Scotland meeting the suggested stretch target of 56%.

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?

Yes

(please explain your answer)

As per Question 3(a), CIWM Scotland agrees that the target should be amended to take account of updated information.

Setting such a target is a way to monitor that Scotland is on track to achieve the level set for 2050 as well as allowing the opportunity to see what needs to be addressed/amended to meet the final target.

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?

Yes

(please explain your answer)

See above, as per Question 3(b)

Question 4:

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

Yes

(please explain your answer)

CIWM Scotland believes that this will provide more clarity and consistency for all sectors working towards achieving these targets and will mean that less recalculation is required at an administrative level. However, it is important that the other recommendations of the CCC as regarding transparency and accuracy are implemented such that the percentage target is being properly and effectively tracked as we move forward.

Question 5:

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

Yes

(please explain your answer)

CIWM Scotland believes this will provide more clarity and consistency for all sectors working towards achieving these targets and will mean that less secondary legislation and administration will be required. However, it is important that the other recommendations of the CCC as regarding transparency, accuracy and most monitoring/review are implemented such that the percentage target is being properly and effectively tracked as we move forward.

Annual targets are a guideline and monitoring aid to assist organisations in tracking their progress. However, it is important to acknowledge that linear reductions may not always be possible and that compliance with mandatory targets is of primary importance.

Question 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?

Yes

(please explain your answer)

This will provide more clarity and consistency for all sectors working towards achieving the targets and will make the results far more transparent and accurate. However, it is important that further explanation is provided as to how this will impact, in real terms, on Scotland's progress to date in reduction percentage terms.

Question 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?

CIWM Scotland believes that this is a sensible approach (given that these new targets are the subject of consultation) provided that appropriate criteria are considered and there is sufficient and robust consultation on any changes sufficiently in advance of them being made.

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

CIWM Scotland feels that it is important that all of the criteria mentioned are taken into account. In addition, waste management policy should be specifically considered as part of the 'environmental considerations' given its direct correlation with climate change.

Question 8:

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

Depending on Scotland's participation in the Paris Agreement in the future and how much impact any changes identified at the Paris Agreement levels are likely to have on the policy set down by the Scottish Government, CIWM Scotland believes that it would make sense for the frequency of future Climate Change Plans to be aligned with the Paris Stocktakes (and produced immediately following each of those). The Climate Change Plans need to remain frequent enough to provide a sufficient review mechanism for how the strategy and policy required to meet the new targets is progressing and whether Scotland is on track to make those targets.

b) What are your views on the length of time each Climate Change Plan should cover?

Bearing in mind the response to 8(a) above, CIWM Scotland suggests that each Climate Change Plan needs to look at the two targets most immediate to its date of production and consider what, if any, new policy or strategic change is required in the immediate and/or longer term.

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

As determined in Question 8(a) above, CIWM Scotland suggests a strong alignment with the Paris Stocktakes.

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

CIWM Scotland suggests that there needs to be a balance struck here between the committees having the requisite amount of time to consider the draft plan and the plan being published within a reasonable time of production. The current draft plan was produced and consulted on in January 2017 but the final version will not be published until early next year – CIWM Scotland believes that this is too long a period for consideration. CIWM Scotland supports the period not being increased beyond the 60 day limit.

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

CIWM Scotland seeks clarification on the issue of using amounts of emissions for under/over performance with the use of percentage based annual targets (as proposed in Section 2). In principle, CIWM Scotland fully supports the proposal that shortfalls should be made up through subsequent plans but CIWM Scotland seeks clarification on what will be required if the shortfall happens in a year near the beginning of a period when a plan has just been produced – will interim measures be required to address that shortfall? **proposals**

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

CIWM Scotland feels that the suggested considerations appear to be appropriate to the wider scope of assessing impacts on people that may arise from the proposed Bill. However, any impact should be: (1) considered more widely in the context of other related strategy and policy considerations – such as those relating to the waste management sector as the targets will not impact on Scotland's people in isolation from such wider issues and (2) linked to existing regulatory requirements and sustainability criteria such as that used in public sector procurement. The existing framework requires assessment of social, environmental and financial implications.

Question 11:**What are your views on the opportunities and challenges that the Bill proposals could present for businesses?**

The report produced by EY covers a significant amount of information but more work is required on how the opportunities (particularly in the renewable energy and energy from waste sectors) will be brought to fruition by joined-up thinking by the Scottish Government on planning, funding etc. The potential impact of Brexit has not been factored into the EY report or the BRIA. CIWM Scotland suggests that more intensive consultation and/or discussion with SMEs in Scotland (who still make up a large proportion of business) should be arranged to ensure that there is full understanding of the opportunities and challenges presented by the changes proposed in the bill – as the correlation will not necessarily be immediately obvious.

Question 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).

On reading the Environmental Report, CIWM Scotland agrees that a wide range of areas (including those relating to waste management) have been considered but clarification is sought as to how the Scottish Government intends to bring those policies together as part of the climate change targets to be introduced.

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

CIWM Scotland are pleased to see both negative and positive impacts expressed and to indicate that some mitigating circumstances may have more of an impact than the climatic pressures themselves. Scotland's policies are outlined in section 4.2 of the full report but there is no real indication of how these policies will align and interact. CIWM Scotland seeks clarification of this.

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

CIWM Scotland is not aware of any other particular environmental effects that need consideration.

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

Taking in account current factors, at this stage, CIWM Scotland believes that the report puts forward sensible recommendations. CIWM Scotland suggests that re-visiting these conclusions and recommendations at a future date should there be any substantial changes such as currently unknown threats becoming apparent, changes to targets etc.

e) Please provide any other comments you have on the Environmental Reporter issues

CIWM Scotland does not have any other comments at this time.

Question 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.

CIWM Scotland does not have any further to add, at this time.