



Transport, Infrastructure and Climate Change Committee Debate:
Scottish Government's draft Report on Proposals and Policies on meeting its climate change targets

The natural environment and rural land can help Scotland to meet its climate change targets but only if it is in good condition and well managed. The Scottish Government's draft Report on Proposals and Policies (the 'RPP') must include **action on peatland restoration** as a policy; place **less reliance on voluntary approaches** including in the agriculture sector where compulsory measures are needed; and **should not include carbon savings from a biofuels policy which will do more harm than good.**

Scottish Government's draft Report on Proposals and Policies (RPP) was published on 17 November 2010, and sets out plans of how to achieve Scotland's emissions reduction targets, up to 2022. Section 35 of the Climate Change (Scotland) Act 2009 sets out the requirements of the RPP including a 60-day period for Parliamentary scrutiny. Following consideration by the Transport, Infrastructure and Climate Change Committee and the Economy, Energy and Tourism Committee, RSPB Scotland calls on Parliament to use the debate on 12 January 2011 to improve and strengthen the RPP. We agree with the TICC Committee that to ensure climate change targets are reached, there should have been more alignment between the Draft Budget 2011-12 and the RPP, and more time for effective parliamentary scrutiny. **RSPB Scotland works with Stop Climate Chaos Scotland and fully supports their wider policy analysis of the Scottish Government's draft RPP contained in a separate briefing¹** This RSPB Scotland briefing is intended to concentrate on the natural environment and rural land use sectors.

We must help the natural environment to help us achieve our climate change targets

Rural land use is one sector included in the RPP but currently accounts for 20% of GHG emissions in Scotland². It also has the potential to store carbon in soil and vegetation and to continuously sequester more carbon from the atmosphere, thus positively contributing to Scotland's GHG reduction targets. How land is managed has a large bearing not only on carbon balances, but also on human well-being and the quality of the environment, including wildlife populations. It can help us achieve our international biodiversity targets. However, only by protecting habitats and ensuring they are in good condition, can they contribute to reducing emissions. Rural land used primarily for other purposes, such as agriculture or forestry, can also contribute – but must be managed more effectively to ensure that carbon stores are protected and that emissions are minimised.

The role of peatland and other carbon-rich habitats

Scotland is internationally renowned for its peatlands, which are found both in remote areas like the Flow Country and in more populated areas such as the Central Belt. The Scottish Government should aim to provide a global example in its actions to restore peatlands, which provide a range of ecosystem services including carbon emissions reduction, biodiversity benefits and maintaining water quality. To deliver such benefits there needs to be a step change in effort to ensure a clear programme of peatland restoration activity. Over 50% of Scotland's estimated 2 million ha peatland area³ has been damaged by past activity such as peat extraction, burning, grazing, drainage and inappropriate forestry planting. Such damage affects carbon storage and water management functions. Damaged peatlands are a huge cost to society and the longer they are left to deteriorate the more costly it becomes to repair them. Restoration techniques aim to raise water levels to allow the bog vegetation to thrive and return the system to one that is capable of forming and storing peat. The Scottish Government already has a commitment to restore peatlands, in recognition of their climate change benefits⁴, as a biodiversity priority and as an important soil ecosystem⁵.

¹ <http://www.stopclimatechaos.org/scotland>

² Changing Land Use in Rural Scotland - Drivers and Decision-Making: Rural Land Use Study Project 1 (Report)

³ SNH Natural Heritage Trends, Scotland 2001, SNH, Battleby

⁴ Climate Change Delivery Plan: Meeting Scotland's Statutory Climate Change Targets <http://www.scotland.gov.uk/Publications/2009/06/18103720/0>

Peatland restoration is currently only a 'Supporting and Enabling Measure' in the draft RPP but is urgently needed as a policy. The 2.7Mt CO₂-e annual emission reduction from restoring 600,000ha⁶ by 2016 would provide carbon abatement five times greater than predicted annual abatement from all RPP land use policies and proposals combined, making it a cost effective means of reducing emissions. **The RPP should signal a strong commitment to increasing the restoration and protection of peatlands and other carbon-rich habitats.** More research is also needed to understand the cost and benefits of restoring and protecting these habitats. As a first step, we welcome the recent funding announcement from Scottish Government for such research⁷.

The recent UN climate change talks in Cancun have agreed that carbon savings from rewetting drained peatlands should be included alongside forestry planting in the international carbon accounting rules as measures to help meet emissions reduction targets⁸. A decision is still to be made as to whether the accounting by governments will be mandatory or voluntary. The new peatland rules, under the Kyoto Protocol, will not apply until after 2012 but all relevant restoration activity since 1990 will be eligible. This means that early action on peatland restoration will be beneficial in helping make greater savings against climate change targets from 2012 onwards.

The role of agriculture

All of the agriculture policies in the draft RPP are dependent on voluntary uptake, a tactic with a poor success record. To ensure urgently-needed carbon abatement, and for agriculture to do its fair share, a regulatory approach is needed. We recommend compulsory Nutrient Management Planning to encourage adoption of Farming for a Better Climate measures. In addition, greater enforcement of existing cross-compliance rules and land management regulations is needed, many of which can reduce emissions; and, new or amended regulations to make climate-friendly measures more widespread.

The role of a Land Use Strategy

The draft RPP refers to the role of the Scottish Government's Land Use Strategy – due to be laid before parliament in March 2011. RSPB Scotland believes that the Land Use Strategy must guide the implementation and integration of RPP policies, whilst seeking to avoid conflict between land uses. This is particularly needed to ensure that the RPP commitment to 'the right tree in the right place' is realised when implementing the policy to increase tree planting to 10,000ha/yr. To do this the Land Use Strategy must aim to achieve multiple benefits from limited land resources.

The role of biofuels

RSPB Scotland supports renewable energy but recent research⁹ by the Institute for European Environmental Policy (IEEP) concludes that, according to current sustainability criteria, meeting the EU Renewable Energy Directive would lead to an increase in emissions. The draft RPP includes carbon savings as a result of this policy's implementation in Scotland but the IEEP report states that the Directive "would lead to between 80.5% and 167% more greenhouse gas emissions than meeting the same need through fossil fuel use" due to the Indirect Land Use Change (ILUC) effects of biofuel production. We seek the removal of the savings attributed to this EU policy from the transport section of the draft RPP.

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⁵ Scottish Soil Framework <http://www.scotland.gov.uk/Publications/2009/05/20145602/0>

⁶ IUCN report : http://www.iucn-uk-peatlandprogramme.org/sites/all/files/100218Briefing_Peatlands_andGreenhouseGasEmissions.pdf

⁷ <http://www.scotland.gov.uk/News/Releases/2010/12/14122804>

⁸ http://maindb.unfccc.int/library/view_pdf.pl?url=http://unfccc.int/resource/docs/2010/awg15/eng/crp04r04.pdf

⁹ http://www.rspb.org.uk/Images/IEEP%20report_tcm9-263710.pdf