

Scottish Land & Estates welcome the discussions on climate change and the constructive effort being made to ensure land managers and those in rural areas are able to play their part in achieving net-zero.

SLE supports the Bill's objective to raise the ambition of greenhouse gas emissions reduction in line with an appropriate contribution to limiting global temperature rises to 1.5 degrees Celsius above pre-industrial levels.

Specifically, SLE considers that the commitment to achieving net-zero emissions, in light of the recent CCC report is a reasonable approach. This Bill is founded on an interpretation of current science, it must be recognised that a level of flexibility will be required for future science to be applied. As such targets should be set according to the most up to date evidence which indicates net-zero by 2045.

It is right for Scotland to be ambitious in setting targets to achieve net-zero emissions, however setting unrealistic targets is likely to result in Scotland exporting its emissions rather than creating the behavioural shift required by all to have meaningful impact.

The key things we would like to see at Stage 3 of the Bill include;

- Nitrogen Balance Sheets
- Agriculture Efficiency Funding
- Realistic Improvements for Housing
- Whole Holding Accounting and business benchmarking indicators
- Using private carbon offsetting as a tool for delivering wider reductions

This briefing covers the positions in the joint WWF & SLE briefing and some additional amendments and positions SLE would like the MSPs to consider.

Introduction

Scottish rural businesses and landowners should be commended for their efforts to date and their continued willingness to adopt new greener technologies and management practices, adapting to be more sustainable. However, it is understood that considerable further effort is needed to facilitate behavioural change and help farmers understand the need to adapt management practices and reduce GHG emissions. For industries to continue to meet demands while reducing GHG emissions it is essential that guidance and support is provided.

SLE recognises that all sectors need to make contributions to reducing Scotland's GHG emissions, however net-zero carbon should be considered as part of a Scotland wide approach rather than viewing industries in silos. We all benefit from more productive, sustainable farming practices and so nationwide efforts should be made to help agriculture meet changing demands and deliver essential public goods.

Through afforestation, regeneration of peatland and renewable energy projects farmers and land managers are already making significant efforts towards the reduction of GHG emissions and atmospheric carbon levels. It is understood that these efforts and other green activities are not being fully represented when assessing the impact of agriculture on climate change mitigation.

Amendment 23: A Nitrogen Balance Sheet for Scotland

Nitrogen balance sheets, or nitrogen budgets, are a well-established technique for understanding how nitrogen flows through our environment across all sectors of the economy. This can be used to develop evidence-based, fair, and efficient policies to tackle hotspots of nitrogen losses, and to calculate nitrogen use efficiency – the ratio of nitrogen inputs and outputs. Unfortunately, an amendment to this effect was not brought forward at Stage 2. However, we welcomed the commitment in the Programme for Government to develop a nitrogen balance sheet for Scotland and are pleased to see this amendment come forward at Stage 3.

We would urge MSPs to support this amendment.

Amendments 25 and 27: Regional Land Use Partnerships & Frameworks

Amendment 25 seeks to strengthen the mandate of the land use strategy to facilitate delivery of climate change targets. Amendment 27 puts a requirement on Ministers to set out proposals and policies in the Climate Change Plan for the establishment, support and resourcing of regional land use partnerships and frameworks. Regional land use partnerships and frameworks are key for identifying land use priorities in partnership with landowners to bring multiple co-benefits, with targeted public spending to support delivery.

We would urge MSPs to support this amendment.

Amendment 30: Emissions from Housing

Whilst we agree that every sector must actively engage in reducing their contribution to emissions we remain concerned about the advice available to landlords and tenants because the EPC standards and the related advice are all connected to a methodology which is not fit for purpose when used to set a minimum energy efficiency requirement. A large part of the problem is that EPCs were originally created to give a quick, simple and relatively cheap method of reporting energy efficiency levels of houses to the European Commission; to implement the requirements of the Energy Performance Building Directive (EPBD). The proposal to use the EPC as the main regulatory tool to improve energy efficiency across Scotland's housing stock is highly flawed.

Until the flaws in the EPC rating system are addressed, we cannot support this amendment.

Amendment 31: Whole Farm Action Plan

To enable sector-wide change farm businesses must be empowered to look at their whole farm system so that they understand where nutrient, energy, carbon and water flows into and out of their farm, enabling them to identify where savings and efficiencies could be made to benefit their business as well as the environment.

We are also of the opinion that agriculture should not be viewed in isolation but should be considered as part of a pan-Scotland approach to achieving net-zero emissions. However, we feel this approach would create the best opportunity for land managers to understand how they can reduce emissions and adapt their businesses for a changing climate.

We agree that research, knowledge transfer and the other tools referenced in this amendment are needed, this can be delivered largely through existing channels with some additional tools needed.

We support this amendment.

Amendment 31A and 31B: Additional elements of Whole Farm Action Plan

These amendments seek to add carbon sequestration and agroforestry to the list of tools which can be used in the reduction of Scottish whole farm greenhouse gas emissions.

We support these amendments.

Amendment 33: Agricultural Modernisation Fund

Responding to the CERG, the Programme for Government set out an intention to consider funding implications in the Budget as part of an Agricultural Transformation Programme. This amendment would ensure policies and proposals for any Agricultural Modernisation Fund be considered in the next Climate Change Plan.

We hope to see further commitments made in the Budget process and would encourage MSPs to support this amendment.

Overall and Interim Targets

SLE continues to support the Government target, as advised by CCC, of net-zero emissions by 2045. We agree there is sufficient evidence and that with the right policy and mechanisms for investment and support this target is achievable. In our efforts to achieve this target we should, through regular reporting and forecasting, identify if it is possible to achieve these targets sooner and adjust policy accordingly. However, setting targets which seek to achieve these targets earlier without sufficient evidence will result in an impossible task and the likely export of our emissions.

The Just Transition Commission and the CCC, along with IUCN and other sources of information will ensure Scotland is pushing itself to succeed rather than fail.

23/9/2019

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