

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Atal Anhrefn Hinsawdd (Saesneg yn unig)	Response from Stop Climate Chaos Cymru
EB 43	EB 43



Cynulliad
Cenedlaethol
Cymru

National
Assembly for
Wales



Stop Climate Chaos Cymru

Response to the Environment and Sustainability Committee
Stage 1 inquiry on the Environment (Wales) Bill
June 2015

Introduction

Stop Climate Chaos Cymru is a coalition of groups from across civil society committed to taking combined action in Wales to combat climate change, and limiting its impact on the environment and the world's poorest communities. Together with our sister organisations in England and Scotland our combined supporter base embraces more than 11 million people spanning over 100 organisations across the UK - from environmental and development charities to unions, community and faith groups and women's organisations.

We believe that climate change is the biggest challenge facing the world in the 21st century and we must take immediate action to tackle this, otherwise we face environmental, economic, cultural and social impacts which will affect future generations, and disproportional impact people in poverty within Wales and across the globe.

This year is particularly important for tackling climate change globally with the UN COP21 meeting in Paris at the end of the year and momentum building towards a fair global deal. This legislation is a key part of Wales' commitment towards that global deal, and we hope that it will be an opportunity to show the world our ambition for Wales and the importance we place on our global responsibilities. It of course leads on from the ground-breaking Well-being of Future Generations Act and is the first opportunity to enact some of the provisions in that Act.

We are proud of the continued strong cross-party commitment in Wales to tackling climate change, and the way Wales led the way with annual carbon reduction targets and 40% by 2020. We hope to build on this with this legislation without losing some key aspects of 2010 Climate Change Strategy.

Our comments are restricted to Part 2: Climate Change of the Environment (Wales) Bill.

A statutory framework for climate change

We have long campaigned for a strategic framework for climate change in Wales and statutory targets, and are very pleased that the Environment Bill contains proposal to introduce carbon budgets and targets. This is a significant development which we hope will receive cross-party support and we hope we can help make it as robust as possible.

We believe that a carbon budget management system is an effective approach when combined with adequate planning, reporting and scrutiny mechanism, with budgets set based on scientific advice and the principles of keeping warming below 2 degrees and differentiated responsibility.

Targets and emissions

A statutory long term target is an essential component of a framework on climate change and shows a clear commitment to deliver for the long term. A 2050 target is consistent with approaches to climate change legislation taken by other European countries such as Scotland, Finland and Denmark.

The target for 2050 is set out as “at least 80%” and we would emphasise that this is indeed a bare minimum requirement. The target should be based on the latest science in order to keep us within a likely chance of avoiding 2 degrees warming. We would recommend looking at the report of the IPCC and work of the Tyndall Centre on setting both global carbon budget and targets, and the responsibility of different countries.

It is not only the end goal of 2050 but the trajectory taken towards the target that is important. We believe that a steep trajectory is necessary and desirable. This should be made clear in the Bill in order to guide the work of the advisory body in setting the carbon budgets and any interim targets.

The current policy target of 40% reduction by 2020 should not be lost as a result of this legislation, indeed it is an opportunity to enshrine it in law. With the first carbon budget not likely to be set until 2018 it is important that momentum for ambitious reductions by 2020 is not lost or reduced due to this gap and uncertainty.

Fairness and Equity

The issues of global equity and fairness are increasingly prominent in climate change discussion and international negotiations, and this long term framework for tackling climate change should reflect these concerns. Developed countries are now acknowledging their historical responsibility for emissions, and targets should be based not only on a safe global carbon budget but what is a fair contribution from different countries – the UNFCC’s core principle of “differentiated responsibility”. We would like to see targets and budgets based on global equity and fairness.

What emissions should be included

Our starting point is that it is important to include all emissions from Wales. As well as being the basis for the current 40% target this also future-proofs the legislation to ensure consistency of reporting as devolved competencies grow over time.

However in order to demonstrate to what extent real action is being taken by the Welsh Government and the impact it has it is necessary to have reporting that disaggregates actions in areas of devolved competence.

Our global responsibilities

The Well-being of Future Generations Act contains the goal of being a globally responsible Wales, and this Bill is one of the first opportunities to show what is meant by this in practice. In terms of greenhouse gas emissions it requires recognising the impact of our consumption on the world, or our footprint.

A requirement within the Environment Bill to calculate and report on emissions produced anywhere in the world that result from Wales's consumption of goods and services would be a significant step forward in helping rich countries understand their responsibility for climate change. It demonstrates that justifying inaction by blaming countries such as China is untenable, as a huge portion of China's emissions result from the production of goods for developed country markets. This measure will also make it harder to 'hide' emissions overseas by closing Welsh businesses and outsourcing their work, which would make little difference to Wales's overall carbon footprint.

Scrutiny

We are concerned that the provisions in the Bill do not provide sufficient scrutiny of Welsh Government and their actions. Current there is only the presentation to the Assembly of the Final Budget Statement, and for policies and proposals where carbon budget are not met. This is far less than the current Welsh Government's reporting in the 2010 Climate Change Strategy which states "We will regularly review our actions and provide annual progress reports to the National Assembly for Wales". Stop Climate Chaos Cymru does not consider 5 years to be sufficiently frequent and suggest some form of annual reporting to the Assembly is necessary in order to progress with sufficient speed.

Annual reporting

We believes that annual reporting by Welsh Government on their progress towards the budgets or interim targets is required. This is a requirement of the UK and Scottish Acts and a current requirement in the Climate Change Strategy 2010. To remove Welsh Government reporting to only every 5 years would not provide the scrutiny or possible accountability to progress and drive emissions in the right way. Annual reporting is also an essential aspect of stakeholder engagement in the understanding of and contribution to emission reduction.

There are a number of forms this reporting could take in terms of the level of detail and what is reported on and we are happy to discuss this further.

We believe that advice from the advisory body should form part of the annual reporting, as it does in the UK Act.

Reporting on policies and sectoral plans

One of our key asks in relation to the Welsh Government's climate change refresh has been to produce a detailed action plan every 5 years evaluating existing and planned

programmes and actions to achieve the required emissions reduction targets. We are therefore pleased that Section 39 sets a requirement on Welsh Ministers to prepare a report.

There is however no information within the Bill on the level of detail that this Policies and Proposals report requires. Stop Climate Chaos Cymru would seek clarification from the Minister about the level of detail in that report and we will also consider possible provisions within the Bill to ensure it provides the detail needed.

We are pleased that the responsibility of “each” Welsh Minister is emphasised in Section 39(2). Right across government, all sectors and department must play their part in reducing emissions and set this as a priority to work towards. The report must contain detail sectoral plans in order to drive delivery.

Impact assessments

We have long advocated carbon assessments of the annual fiscal budget and major strategies and infrastructure. This work should be carried out under these proposals through the Welsh Government’s decision-making procedure as part of the ongoing assessment to meet the carbon budget, therefore no additional work should be necessary. However we would like to see a requirement for these to be made public and part of scrutiny of proposals and budgets not only retrospectively at times of reporting (as far ahead as 7 years later).

Advisory body

We welcome the role set out for an advisory body and believe that setting budgets, targets and reports in line with independent advice is crucial.

The advisory body needs to have in-depth expertise and adequate resources to carry out its duties under this Part. We support designating the UK Climate Change Commission as that body, but also agree that there should be the possibility of appointing a Welsh body to carry out this role in future if resource and expertise is made available.

Stop Climate Chaos Cymru member organisations are: National Federation of Women’s Institutes Wales, National Union of Students, Unison, Christian Aid Wales, CAFOD, Oxfam Cymru, Tearfund, Coed Cadw – The Woodland Trust, Friends of the Earth Cymru, RSPB Cymru, Sustrans Cymru, WWF Cymru, Wildlife Trusts Wales, The Centre for Alternative Technology, Wales Centre for International Affairs.

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