

## **Community Woodlands Association Consultation Response: SNH “Climate Change and the Natural Heritage” Policy Statement & Action Plan (2009-2014)**

### **Introduction**

The Community Woodlands Association is pleased to have the opportunity to respond to the consultation on SNH’s “Climate Change and the Natural Heritage” Policy Statement & Action Plan (2009-2014)

The CWA represents over 130 community groups across Scotland, many of whom are actively involved in climate change adaption and mitigation through enhanced woodland management, creation of habitat networks and development of woodfuel supply to substitute for fossil fuels. Through the informal alliance of Local People Leading we also work closely with fellow intermediaries such as the Development Trusts Association, Community Recycling Network Scotland, Community Energy Scotland and the Transition Towns Network, whose members are engaged in similar work.

We agree that “climate change as the most serious threat over coming decades to Scotland’s natural heritage”, and that it “is likely to have major social and economic implications for people in Scotland and elsewhere.” Climate change is a global challenge, which cannot be managed by “business as usual”, but must be tackled by urgent and radical measures.

Unfortunately the SNH Policy Statement & Action Plan represent a completely inadequate response to Climate Change. In particular, they seem to be a classic example of the “quango fallacy” - the almost entirely delusional assumption that meaningful change can be engendered by policy statements, inter-agency partnership working and an occasional dash of public awareness raising.

### **Scottish Government commitments & aspirations**

Achieving the Scottish Government’s commitment to reduce emissions by 80% by 2050 requires that government and its agencies engage and mobilize the people of Scotland in a transition to a low carbon economy. Local communities must be at the heart of our response to the global challenge – which demands massive and urgent behaviour change and relocalisation of our economy and society.

We believe that individuals and communities will not buy into such change unless they are empowered to take a leading role. Review and improvement of the Land Reform Act, and provision of adequate financial support for asset transfer and development, underpinned by a strengthened Scottish Government and Local Authority commitment to community empowerment are necessary.

At the same time, government policy across all departments require review and alignment to ensure a joined-up approach, and that government spending is focused on encouraging positive action, particularly in sectors such as land management. These actions are not mutually exclusive, indeed we would argue that all need to be taken forward – it is clear that climate change cannot be tackled without a fundamental restructuring of the way we manage our land and economy.

We note that the Scottish Government has set challenging targets for renewable energy and reducing the impact of production and consumption, to:

\*Generate 50 per cent of Scotland's electricity from renewable sources by 2020 (~8 gigawatts) with an interim target of 31 per cent by 2011 (~5 gigawatts), and 20 per cent of Scotland's total energy use to come from renewables by 2020.

<http://www.scotland.gov.uk/Topics/Business-Industry/Energy/19185/17612>

\*Reduce the local and global environmental impact of Scotland's consumption and production.

<http://www.scotland.gov.uk/About/scotPerforms/outcomes/envImpact>

lists a number of measures including:

- Ensure that policy options and public spending decisions contribute to reducing emissions and to the action needed to help mitigate climate change.
- Fund initiatives by farmers and others to reduce climate change emissions from land management practices and to manage our rural environment more effectively.
- Support the delivery of ten megawatts of marine energy from our waters by 2010, helping to make Scotland the world leader in wave and tidal power;
- Triple the funding for community renewables and microgeneration to reach £13.5 million a year by 2010-11.
- Ensure the Forestry Commission can invest £15 million a year in new woodlands to help increase forest cover to 25% as rapidly as possible.
- Vigorously pursue our zero waste policy, setting challenging targets for reduction in municipal waste sent to landfill; allocating £150 million to the Zero Waste Fund and consulting on a range of potential legislative measures.
- Establish a Climate Challenge Fund to inspire community-based action to tackle climate change - £18 million over the period 2008-11.

Given the context one might, naively, imagine that SNH would be leading the charge on some or all of these, instead, the Policy Statement & Action Plan present an organization that is either silent or dragging its heels. A number of key areas of omission or equivocation are outlined below.

### **Communities**

We can find no reference in either document to the Transition Towns movement or indeed to community-led action or engagement of any kind. This is a major omission. SNH should be actively working to support such initiatives.

### **Woodland Expansion**

The Policy Statement & Action Plan express at best lukewarm support for the Government's aspiration to 25% woodland cover, e.g.: "Supporting increased woodland coverage through avoiding deforestation and encouraging regeneration of declining woodlands." (Action Plan p4). The documents should express much stronger support for woodland expansion to deliver multiple public benefits, including climate change mitigation.

### **Renewable Energy**

As with woodland expansion, renewable energy developments are considered more in terms of their potential threats to the "natural heritage" (including subjective aesthetic considerations). SNH should be taken a much more positive view of such developments, particularly where they are small scale and community-led.

### **Agriculture & Land Management**

It is acknowledged that the agricultural sector is a major contributor to Scotland's GHG emissions, although the table and accompanying notes on p15 of the Policy Statement are

somewhat misleading and have the effect of underplaying the gross emissions from the agricultural sector, e.g. the GHGI report says: “Net emissions/removals in Scotland are dominated by the large Forestland sink (-10.1 Mt CO<sub>2</sub> in 2005) although the Cropland source is also significant (6.5 Mt CO<sub>2</sub> in 2005).”

SNH should be arguing for a restructuring of the significant levels of aid the Scottish government provides to farmers: notably an increase in modulation to reinforce funding programmes to support adaption and mitigation measures, and revision of GAEC (Good Agricultural & Environmental Condition) measures to incorporate the requirement for agricultural holdings to reduce emissions or adopt mitigation measures as a condition of continued receipt of Single Farm Payment.

## **Conclusion**

Climate change demands urgent and radical action, which is not evident in these documents. If SNH is to have any meaningful role in Scotland mitigating and adapting to climate change then it needs to start taking some positive action, and if it can't then at the very least it ought to start supporting those who can.