

Department for Environment, Food and Rural Affairs

Consultation on the draft Climate Change Bill

Response proforma

Please use this proforma to answer the questions in the above document. The closing date for the submission of responses is **12 June 2007**.

Responses should be clearly marked in the subject field “**Consultation on draft Climate Change Bill**”, and should be sent:

- by email to: climatechangeconsultation@defra.gsi.gov.uk
- or by post to: Patrick Erwin / James Hardy, Climate Change Legislation Team, Area 4/F5, Ashdown House, 123 Victoria Street, London SW1E 6DE

The email address may also be used for general queries relating to this consultation. Please mark the subject field **Consultation on the draft Climate Change Bill**.

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Setting statutory targets

1. Is the Government right to set unilaterally a long-term legal target for reducing CO₂ emissions through domestic and international action by 60% by 2050 and a further interim legal target for 2020 of 26-32%?

There are actually three questions here. First, is it right to set unilateral legal targets? Second, are the specific targets in the Bill the right ones? And third, should those targets be for cuts to be achieved through domestic *and* international action? Friends of the Earth believe the answers to these questions are, respectively, yes, no and maybe. Further details on the first and second of these questions is below – further details on the third are under Q7 of this consultation.

First – it is right to set a legal target because carbon dioxide emissions are rising despite agreement across political parties that they should be falling. Targets for cutting carbon emissions have been included in the last three Government manifestos as a central plank of the environment policy, yet Ministers now say that the 2010 target cannot be met. It must be accepted that “party policy” targets have failed to lead to the requisite action being taken. A far more robust process for ensuring progress is required, which is why Friends of the Earth has been calling for a Climate Change Bill and has welcomed the decision to bring one before Parliament.

However, in answer to the second question, the targets in the Bill (to reduce carbon emissions by 26-32% by 2020 and 60% by 2050) are not the right level. Targets should be set at levels that ensure total emissions from the UK between now and 2050 do not exceed a reasonable share of the total global emissions that can be released while meeting the Government’s aim of keeping global warming below 2 degrees Celsius.

This is not a departure for Government policy, but a logical evolution of the current policy. The 60% target was adopted as Government policy (and subsequently that of other parties too) following a recommendation by the Royal Commission on Environmental Pollution who took exactly this approach. RCEP’s recommendation – accepted by the Government – was that

“The government should now adopt a strategy which puts the UK on a path to reducing carbon dioxide emissions by some 60% from current levels by about 2050. This would be in line with a global agreement based on contraction and convergence which set an upper limit for the carbon dioxide concentration in the atmosphere of some 550 ppmv and a convergence date of 2050”

At the time of RCEP’s report, the “*upper limit for carbon dioxide concentration ... of some 550ppmv*” was viewed as broadly in line with restricting temperature increase to 2 deg. C. It is now widely accepted that it is not, including in the Government’s “Climate Change – the UK’s programme 2006”, which says

“in the mid-1990s the EU proposed that the aim should be to limit global temperature rise to no more than 2°C to avoid dangerous climate change ... At that time, it was thought that this equated to atmospheric carbon dioxide levels below approximately 550 ppm. The more recent work of the IPCC suggests that a limit closer to 450 ppm or even lower, might be more appropriate to meet a 2°C stabilisation limit.”

Therefore the target for a 60% cut by 2050 is (and is accepted by the Government to be) out of date. Friends of the Earth do not believe this target should be included in the Bill. It is worth noting a recent Tyndall Centre briefing note on the draft Bill estimates that if international action was apportioned as per the RCEP report, the Bill targets would lead to atmospheric concentrations upwards of 600 ppm, and possibly in excess of 750 ppm, contributing to a world warmer by 4 or 5 degrees¹.

Obviously the catastrophic impact of such a temperature increase is the most important reason for increasing the level of cuts required by the Bill. But there are other reasons as well.

¹ Tyndall Briefing Note 17, March 2007. A response to the Draft Climate Change Bill’s carbon reduction targets. Tyndall Centre for Climate Change Research, University of Manchester.

The targets in the draft Bill would mean the UK conceding international leadership in terms of its ambition to cut emissions. France has its aim of annual cuts in greenhouse gas emissions of 3% and its belief that developed nations must cut emissions by 75-80% by 2050 in legislation². The German Government has announced targets for a 40% cut in emissions by 2020 and 80% by 2050. Even in the US more ambitious targets than that in the draft Bill are gaining ground. California already has a target for an 80% cut in greenhouse gases by 2050. The same target is backed at federal level by two potential presidents – Senators Clinton and Obama – who support the Global Warming Pollution Prevention Bill.

Retaining targets when it is so clear that they are inadequate would also reduce the certainty business needs on the future pathway for carbon emissions, and could lead to perverse investments and technology developments. Investment in low-carbon technologies and services would be boosted if business had confidence that more significant cuts will be delivered by Governments. Inadequate targets may also lead companies to conclude that developing more carbon intensive infrastructure or products remains viable – locking in carbon consumption for a further period.

The targets must therefore be changed. There is not one single answer to what the 2020 and 2050 targets should be to meet the aim of achieving the UK's fair share of effort to prevent 2 degrees C of warming. It is cumulative emissions across the period that must be restricted rather than emissions in any particular year. We therefore believe the Bill should include a requirement that

1. That the principle aim in setting targets and budgets under the Bill is to ensure the UK restricts its total emissions up to 2050 to a fair share of the global emissions allowable possible while preventing dangerous climate change of more than 2 degrees Celsius.
2. That in determining what is a "fair share" regard must be had to the principle of equal rights to emit carbon dioxide for all people around the world, as well as progress and agreements made internationally on climate change.

Friends of the Earth believe that annual cuts that begin immediately of at least 3% will be needed to meet these aims. Any delay in making these cuts will increase the rate of reduction required. Expressed in the same terms as the 2020 and 2050 targets in the Bill, this means cuts of at least 40% by 2020 and 80% by 2050 (on a 1990 baseline). It should also be noted that making greater cuts early (i.e. making the 2020 target more ambitious) has a greater effect on reducing cumulative emissions than making them later (i.e. making the 2050 target more ambitious).

In conclusion, page 6 of the consultation document summarises the rationale for legislation in paragraph iv, saying the Bill is necessary to

“provide a clear, credible and long-term domestic framework ... [allow] the UK to demonstrate strong international leadership ... provide greater clarity for UK industry to effectively plan and invest in the technology needed”

Unless targets match current knowledge about climate change, they will not be credible. If they remain less ambitious than other countries they do not show international leadership. And if they leave doubt as to if, or when, they will be changed to meet the known challenge, they will not provide clarity.

2. Is the Government right to keep under review the question of moving to a broader system of greenhouse gas targets and budgets, and to maintain the focus at this stage on CO₂?

Friends of the Earth agree with the Government's proposal that the Bill's initial focus should be on carbon dioxide, but that it should be flexible enough to include other greenhouse gases in the future.

However, the Bill should not allow the initial exclusion of the UK's share of emissions from international aviation and shipping. We recognise the Bill contains powers for these emissions to be included in the budgets in the future, but the lack of any timescale on such inclusion is unacceptable. It plainly makes no difference to the climate where the emissions come from – simply that they are emitted. There is therefore

² Article 2, Stratégie Énergétique Nationale, www.legifrance.gouv.fr/WAspad/UnTexteDeJorf?numjo=ECOX0400059L

no sense in excluding these sectors from the targets and budgets planned – particularly as they are already growing more rapidly than in any other sector. Leaving them outside the Bill could lead to infrastructure development that makes it much harder to reach the required targets.

It is also not entirely the case that there is no international agreement on how to count emissions from these sectors (paragraph 5.8) as emissions are included as a memo item in reports to the UNFCCC under the Kyoto protocol. True, these emissions are not counted as part of the Kyoto targets, but an internationally agreed methodology for allocating these emissions is already in place and in use.

Finally it is worth noting that while we have already argued at length why the 60% target is inadequate in response to Q1, it should also be pointed out that as expressed in the Bill (excluding these sectors), this target is not even a true reflection of the RCEP recommendation. The RCEP report did not specifically state whether these sectors were included or not, which in itself should lead to the conclusion that they were. Furthermore, the entire basis of RCEP's recommendation was based on a global carbon limit, meaning that all emissions - including those from international aviation and shipping - must by definition be included.

Friends of the Earth therefore believe that emissions from international aviation and shipping should be included from the first budget period, calculated in the same way as the current "memo item". The Bill should allow changes to this methodology when further international agreements are reached. Using an existing method to account for such emissions does not prejudice international negotiations, or give away the Government's negotiating position. And while a new agreement may lead to a change in the allocation of such emissions to the UK requiring an adjustment to our policy programme or targets and budgets, the difference would be far smaller than moving from a position where they were not counted at all.

Carbon budgeting

3. Should the UK move to a system of carbon management based upon statutory five-year carbon budgets set in secondary legislation?

As the UK must live within a carbon budget over an extended period, rather than simply hit a target at some point in the future, Friends of the Earth wholeheartedly agrees with the principle of carbon budgeting which counts all emissions, rather than simply those from specific target years.

However, as well as being scientifically correct, the Bill must design a process that gives confidence that Governments will keep the UK within those budgets over many years. It must require successive Governments to do their bit and not to shirk action in the hope a future Government will pick up the slack. It must ensure that every Government can be held to account, and cannot pass the buck to a future Government – or blame a previous one.

Friends of the Earth believes that there is a very real danger that as drafted – with five year budget periods that will almost inevitably overlap with two Parliaments – the Bill will fail to do this. Even the very first proposed budget period will take in two Parliaments: the period will run from January 2008 to January 2012, so an election in May 2010 would fall almost precisely in the middle of this period.

It is not hard to imagine a situation where a Government approaching an election might duck tricky decisions or delay a policy until after the vote. The temptation to do this when approaching an election where the Government is seriously worried it might lose would be even stronger. The blame for missing the budget would then be shouldered by the successor Government. They in turn could simply water down the budget while blaming the previous Government for doing too little in the early stages to make the original budget possible. Everyone blames each other – but crucially carbon emissions are not cut as required.

Friends of the Earth proposed annual targets to prevent such buck-passing. There have been wild claims about annual targets – such as they would require the closure of airports if emissions were off track. To our knowledge no person or organisation has ever proposed such targets, other than people who have been arguing against annual targets. However the argument does (albeit crudely) highlight the challenge of

allowing some flexibility to take account of short-term fluctuations in weather, relative fuel costs, etc with a firm steer that keeps Governments on track.

The proposed five-year budgets allow flexibility, but the buck-passing “loophole” means they fail to provide the firm steer. The Committee on Climate Change will help to an extent through annual reports on progress – but under the Bill as drafted will be second guessing what Ministers were intending to achieve before they can judge whether they have met those objectives.

Combining indicative annual milestones with the legal framework of the budget periods would offer flexibility and a firm steer. Every Government responsible for a part of a budget period can best be held to account if they have stated clearly what they intend emissions to be in each year. The Committee can then judge progress against what was planned. The Committee can, if appropriate, take account of inclement weather, or price shocks, in reaching its assessment. But the basis of the assessment should be whether it matches up to what Ministers were trying to achieve.

Friends of the Earth also welcome the proposal by the Environment Agency for a requirement to purchase (or an allowance to sell) international carbon credits should annual milestones be missed (or exceeded). This would have several benefits – most importantly offering an incentive to meet or exceed the annual milestones for Governments or Ministers who are in power at the beginning of the budget period. But it would also help prevent any need to purchase (or sell) large quantities of credits at the end of a budget period, by allowing us to keep up with any payments across the five-year period. Such a scheme would have to be based upon robust trading schemes, to avoid the problems with trading discussed in answer to Q7.

4. Do you agree there should be at least three budget periods in statute at any one time?

Friends of the Earth agree that at least three budget periods should be in place at all times, with the caveat that all budgets and targets must be set such that total emissions by 2050 are kept within limits. As currently drafted only two budget periods are constrained (those containing the 2020 and 2050 target years) – other budget periods are not even required to reduce from the previous one. Having the overarching principles for determining budgets and targets on the face of the Bill suggested in response to Q1 is therefore crucial.

Friends of the Earth also believe that to deliver certainty for various sectors of the economy, clear sectoral targets should be established. The Bill should require these targets to be set out as well.

Reviewing targets and budgets

5. Do you agree there should be a power to review targets through secondary legislation, to ensure there is sufficient flexibility in the system?

Friends of the Earth agree that targets should be subject to review if developments in scientific understanding of climate change make it clear they are no longer the right targets (indeed this is the whole basis of our response to Q1, calling for the targets in the draft Bill to be changed).

It is also the case that international agreements may place new requirements on the UK to cut emissions, and it is right that the Bill allows the flexibility to reflect these changes too. However, we do believe that the UK should maintain its aim to lead international climate change negotiations, so we would not want UK targets to be revised downwards simply to meet an inadequate global agreement.

With regard to amending budgets, the Bill currently offers too much flexibility. There is little justification for amending a budget period up to 18 months after it has finished, given the options of both purchasing credits, and borrowing from future budget periods are also included in the Bill. There is justification for making amendments to future budgets should there be scientific evidence that this is necessary, or a change in international agreements that change the UK’s obligations.

6. Are there any factors in addition to, or instead of, those already set out that should enable a review of targets and budgets?

No.

Counting overseas credits towards the budgets and targets

7. Do you agree that, in line with the analysis in the Stern Review and with the operation of the Kyoto Protocol and EU ETS, effort purchased by the UK from other countries should be eligible in contributing towards UK emissions reductions, within the limits set under international law?

We are not opposed to purchasing of effort from overseas in principle, but in practice believe current trading schemes have serious problems that should greatly limit their use in lieu of making cuts in the UK.

In an ideal world, where every country had a cap on emissions that represented an equitable sharing of the effort necessary to prevent a 2 degree Celsius rise in temperature, a robust trading scheme could ensure the most cost effective savings are made. However, if the caps on schemes are not as robust as this (or worse still, there are no caps), then the credits that will be bought are likely to be from the most lax schemes, not the most cost effective savings. Therefore a precautionary approach should be used in the meantime – with the Committee on Climate Change advising on the extent and conditions on trading.

A crude way to limit the potential for claimed reductions to not be real ones would be to limit the proportion of the reduction that could be achieved through the purchase of credits. This would not guarantee the credits were robust, but would mean that at least they did only limited damage to the Bills ambition for emission cuts. With currently available credits being inadequately robust (EU ETS not having a sufficiently reducing cap; JI/CDM no having a cap at all) this limit would need to be restrictive at first, but could be relaxed as trading schemes improved.

Alternatively, the Committee could advise which schemes could and could not be used to meet the targets in the Bill, or even that some schemes must be used on the basis of an “exchange rate”, where 2 tonnes of credit were deemed equivalent to 1 tonne of domestic effort – the extra credits making up for “leakiness” of the trading scheme, or inadequacy of its caps.

It is also essential that the use of trading schemes is not used as a short-term fix that leaves the UK locked into high-carbon developments. As well as being potentially damaging to the UK economy in the longer term, continuing to pollute and paying our way out of it would not be a strong leadership position from which to convince other countries to cut their emissions. It is therefore essential that the annual reports on progress include information on actual emissions from the UK, as well as the net emissions when credits are taken into account.

Banking

8. Do you agree it should be permissible to carry over any surplus in the budget? Are there any specific circumstances where you consider this provision should be withdrawn?

Assuming the Bill restricts total emissions by 2050 to an acceptable level, (which the draft Bill does not, see Q1), then carrying forward emissions cuts is acceptable, and may incentivise deeper, earlier cuts – which have great benefit. The ability to “carry forward” a surplus should be withheld if scientific understanding of climate change leads to a requirement to make deeper cuts than originally believed necessary.

Borrowing

9. Do you agree that limited borrowing between budget periods should be allowed?

We would of course prefer that Government’s got well ahead of their targets and did not need to use this facility. However a strictly limited amount of borrowing would be acceptable. We believe that Government should be prevented from making a decision to borrow until the last year of a budget, to ensure maximum

effort is put into delivering cuts earlier in the period, and that the borrowing facility really is only used to deal with unforeseen events such as extreme weather or a fuel price shock when it is too late for policy changes to deal with this.

It is arguable that 1% of the next budget period is actually more generous than is necessary to deal with such events. If emissions fell in a straight line to meet five-year budgets that were falling by 15%, the table below shows how the borrowing provision allows emissions to be over 4.5% above the intended trajectory in the final year – a somewhat larger excess than is usually attributed to adverse weather.

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
5-year budget	500					425				
Annual budget	106	103	100	97	94	91	88	85	82	79
With borrowing					98.25					

Compliance with carbon budgets and targets

10. Is it right that the Government should have a legal duty to stay within the limits of its carbon budgets?

Friends of the Earth supports the proposal for the Government to have a legal duty to meet carbon budgets. However we believe that relying solely on Judicial Review as the legal enforcement has limitations.

First, it is difficult to see how a Judicial Review brought after the target had been missed would help in keeping emissions on track. Far more effective would be the opportunity to challenge a set of policies that were clearly inadequate to meet the budgets in advance. This would at least allow the court to require Government redraw policies. Similarly a requirement that Government revise policies should there be a serious diversion from the annual milestones proposed in Q3 would prevent problems building up over several years.

Second, the potential cost of Judicial Review can make it hard for interested parties to bring such actions. A presumption could be written into the Bill that the Government would bear its own costs for any application for Judicial Review (provided it was not a malicious or frivolous) enabling this power to be more accessible to concerned parties with limited resources.

The Committee on Climate Change

The need for an independent analytical organisation

11. Do you agree that establishing an independent body will improve the institutional framework for managing carbon in the economy?

Yes, if the Committee is truly independent and able to speak without fear or favour; and if it is clearly tasked with stating what is required to prevent climate change, rather than what politicians might want to achieve.

The Committee should have as its primary focus however the science of climate change, and what it is necessary to do to prevent dangerous climate change. It sends a somewhat strange signal that this should appear 6th in a list of 8 requirements for the experience and expertise of the Committee (Schedule 1(3)).

Friends of the Earth believe serious consideration should be given to allowing a body other than the Government to appoint at least some of the members, and that appointments should be scrutinised and approved by the appropriate Select Committee (initially the Environmental Audit Committee).

Functions of the Committee on Climate Change

12. Do you agree that the Committee on Climate Change should have an advisory function regarding the pathway to 2050?

Friends of the Earth agrees that the Committee should advise on the pathway to 2050. Indeed we think the Committee should have a much greater role in advising on this pathway – including advising on the 2020 and 2050 targets that define where the pathway ends.

Currently the Bill appears to go to great lengths to avoid asking the Committee for advice on the level of the 2020 and 2050 targets. For example, clause 20 of the Bill gives the Committee a duty to advise on budget periods, use of carbon credits and the sectoral share of emissions. Clause 22 gives a further duty to advise (if requested by the Secretary of State) on limits to trading, how to prepare statistics, whether to include other greenhouse gases and targets for those. It is true that clause 21 allows the Secretary of State to ask for advice on the 2020 and 2050 targets – but only because it is a blanket clause allowing him to ask for advice almost anything at all. Given the centrality of these targets to the adequacy of our response to climate change it seems odd to only allow this advice under this catch-all clause.

Further evidence of the way the Committee is excluded from this issue comes in the Secretary of State's duties to listen to the Committee. Clauses 5, 8, and 13 require the Secretary of State to obtain and take into account advice from the Committee before setting carbon budgets, borrowing or banking emissions credits and varying budgets respectively. Clause 1 setting the 2050 target (and 3 which includes the 2020 target) do not require him to do this before setting or varying the most important targets in the Bill.

In summary, the draft Bill could leave the Committee being asked to advise on the perfect pathway to completely the wrong destination. Giving the Committee an additional role in reviewing the 2020 and 2050 targets is therefore essential, and the Committee should exercise this power in line with the overall aims set out in the response to Q1.

13. Do you agree with the proposal that the Committee on Climate Change should have a strongly analytical role?

Yes.

Factors for the Committee on Climate Change to consider

14. Are these the right factors for the Committee on Climate Change to take into account in assessing the emissions reduction pathway? Do you consider there are further factors that the Committee should take into account?

Issues of international equity should be included in the list of factors the Committee takes into account. The apportionment of emissions between countries is crucial in assessing the level of cuts required in the UK. Although this will (hopefully) ultimately be determined by international agreements, advice from the Committee could help steer the UK towards the correct level of target in advance of such agreement.

Membership and composition

15. Do you agree the Committee on Climate Change should be comprised of technical experts rather than representatives of stakeholder groups?

Yes.

16. Are these the appropriate areas of expertise which should be considered? Do you consider there are further areas that should be considered or any areas that are less important?

The Committee should also include expertise on the international equity issues covered in Q14.

Enabling powers

Extending the suite of domestic trading schemes

17. Do you agree with the principle of taking enabling powers to introduce new trading schemes?

Friends of the Earth recognise that further domestic trading schemes could play a role in reducing emissions. Of course there are many other mechanisms that will also be able to play a role – such as green taxes, product regulation, procurement and so on. We are happy for enabling powers to allow such measures to be included in the Bill if this is the most efficient way of getting them through Parliament, and providing there is still sufficient scrutiny of schemes that come forward under them.

Benefits and structure of enabling powers

18. Do you consider that these powers are sufficient to introduce effective new policies via secondary legislation? If not, what changes would you make?

Yes.

Reporting

The need for regular, independent monitoring of the UK's progress

19. Do you agree that the Committee on Climate Change should be responsible for an independent annual report on the UK's progress towards its targets which would incorporate reporting on a completed budget period every five years?

Yes. Friends of the Earth believes the reports should be based on assessing progress towards the annual milestones the Government set out to indicate what its policies should achieve each year (see question 3). Effort should also be made to speed up the reporting timescales so that feedback on progress (and particularly those times when there is a lack of it) is more rapid. A power to revise these timescales to be more responsive would be a helpful addition to the Bill.

Adaptation

20. Is statutory reporting the best way to drive forward progress on adaptation while at the same time ensuring Government is able to develop flexible and appropriate measures reflecting developments in key policy areas?

Friends of the Earth believes the focus of the Bill should remain on mitigating climate change – we still have time to avoid the worst effects with concerted effort. However, even in the best case, adaptation to some change will be necessary and so further reporting on this is welcome.

Reporting on the international policies to help people adapt to climate change would also be welcome – particularly reports on policies in the developing world where the impacts are expected to be more serious.

Other responses or comments

Devolution

Friends of the Earth has also considered the devolution aspects of the Bill. It is our view that the targets/budgets in the Bill must cover all the devolved jurisdictions, because the Bill aims to provide a framework for the UK to meet its obligations under international agreements.

To meet such targets of course it does not require that every part of the UK need deliver exactly the same percentage cuts. Any differential in the contribution towards the UK target is likely to be small – while there are differences in the various devolved jurisdictions, there is no question that in global terms all are advanced developed nations that need to be cutting emissions significantly to play a fair part in tackling global climate change. That said, it may be that difference in the potential for renewables, or a predominance of heavy industry in certain places lead to modest differentials. These may also arise as a result of cross-border effects – such as the possible siting in Wales of fossil fuel stations that may largely supply England with power.

It is crucial though that overall the UK must cut emissions as outlined in Q1. If a devolved jurisdiction believes the UK targets are inadequate in this respect, it would be unreasonable to expect additional reductions that they decide to make to result in a lower contribution elsewhere. So, should the Scottish Parliament believe the final Bill targets are inadequate, and so adopt a target for deeper cuts, reductions in Scotland above the UK Bill targets should be treated as additional to the Bill objectives, not part of it.

It is also the case that within each devolved jurisdiction, some cuts will be made by UK-wide policies emanating from Westminster, and others by policies from the devolved Parliament or Assembly. This is even the case with a single sector of carbon – like cars for example. The fuel efficiency of cars may be predominantly affected by Westminster policies on VED (and EU mandatory car standards); use of cars rather than buses/bikes etc is predominantly affected by public transport policy in the devolved jurisdictions.

Finally, it is of course right that the Devolved Assemblies/Parliaments should have as rigorous independent scrutiny processes and annual reports as the Bill provides for Westminster

Friends of the Earth therefore believes that the UK Government should negotiate an agreement with each of the devolved jurisdictions regarding the level of budgets for that jurisdiction, such that the cuts when combined are in line with those required under the Bill. This should take the form of a published strategy for each jurisdiction showing how budgets will be met, or a “memorandum of understanding”. With agreement, Ministers in the devolved assemblies could adopt a duty to meet their part of the memorandum of understanding just as Ministers in Westminster are required to meet the budgets in the Bill. It may also be that the devolved jurisdictions decide to pass their own Bills to place further duties on their Ministers.

The Committee on Climate Change should form subcommittees to scrutinise each devolved jurisdiction and the progress they are making. We propose that each subcommittee is made up of 2 members who work solely on that jurisdiction’s progress and policies, and 2 members who also sit on the main Committee. This balances scrutiny of progress in the devolved jurisdictions with the broader picture of UK emissions.

A reporting structure should be arranged so that the devolved jurisdiction subcommittees feed reports on progress into the Committee’s report on UK progress. Similar duties should be agreed with Ministers in the devolved jurisdiction to respond to the subcommittee reports. If the devolved administrations take on further duties under devolved legislation, they may wish to appoint separate independent advisers.

Company reporting

Friends of the Earth would also like the Bill to require companies to report on their carbon emissions. Current reporting requirements do not enable meaningful comparison of emissions between companies. The Bill could rectify this and provide better information for investors and others – as well as encouraging companies themselves to properly record the emissions they are responsible for.