

## **Pre-legislative scrutiny of the Draft Climate Change Bill**

### **A submission by the Baptist Union of Great Britain, the Methodist Church, the Religious Society of Friends (Quakers) and the United Reformed Church**

#### **1. Background**

We welcome the draft Climate Change Bill and are grateful for an opportunity to comment on the proposed legislation.

There are some 150,000 members of Baptist churches associated with the Baptist Union of Great Britain. The Methodist Church has about 295,000 members and 800,000 people are connected with the Church. The Religious Society of Friends (Quakers) has a membership of around 15,000 with up to a further 15,000 attending Quaker worship. The United Reformed Church comprises about 150,000 adults and 100,000 children.

Many in our churches are gravely concerned about human-induced climate change. Our relationship with God's creation and role as responsible stewards is viewed as an integral part of our relationship with God. Individuals and congregations have sought to model sustainable and responsible lifestyles. However, the challenge of reducing household carbon emissions to levels consistent with a theoretical sustainable per capita carbon budget is considerable. There is increasing recognition that effective government legislation is necessary to complement voluntary action<sup>1</sup>.

The work of our denominations on climate change draws on contributions across a range of sectors including those with public policy, business and technical expertise. This work is undertaken in collaboration with Christian Aid, Operation Noah and other groups.

#### **2. Targets**

##### **2.1 The basis for determining targets for reduced emissions**

The European Union advocates action to limit global temperature rise to two degrees. We believe that this should be the starting point for determining a trajectory for UK emission reductions.

Section 5 of the draft Bill provides a list of matters to be taken into account in relation to carbon budgets and the reassessment of 2020 and 2050 targets. Given that competing priorities are represented here the draft Bill should state more explicitly that scientific knowledge about climate change must be the over-riding consideration in setting targets. This is essential if the UK is to continue to demonstrate leadership. We see no difficulty in meeting our international obligations if the UK were to adopt this approach as there are unlikely to be circumstances in which they would be more onerous than the obligation implied by the consensus on climate science.

The Tyndall Centre has described an approach<sup>2</sup> for tracking back from the temperature threshold to determine national emission pathways. We suggest that the targets that are proposed should provide a confidence of more than 50% that they represent a UK contribution to avoiding a greater than two-degree temperature rise. Notwithstanding the several variables involved to establish this correlation, we ask whether independent scientific scrutiny of proposed targets could be carried out to determine whether a target provides this degree of confidence. One could argue that a greater degree of confidence could be sought

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<sup>1</sup> "Prosperity with a Purpose", (Churches Together in Britain and Ireland, 2005)

<sup>2</sup> "A response to the Draft Climate Change Bill's carbon reduction targets", Anderson and Bows, (Tyndall Briefing Note 17, March 2007)

but anything less than 50% would appear to conflict with the UK Government's commitment to the precautionary principle.

## **2.2 The 2020 and 2050 targets**

Against the above test the 2050 target of at least a 60% reduction on 1990s levels already looks inadequate. We therefore urge that the 2050 target (and therefore the 2020 target) be reassessed in the light of the fourth report of the International Panel on Climate Change.

We do not see why an upper limit should be set for the 2020 target; if swifter progress can be made, that is all to the good.

## **2.3 The rationale for five-year budgetary periods**

We support the rationale provided for a five-year budgetary period. We also support the proposal to set targets for three five-year periods at any one time providing business with a sound basis for making long-term investment decisions.

We would argue that the second and third five-year periods should be supported with an indication of the necessary policy recommendations to achieve reductions in the longer-term. These recommendations should provide an indication of the likely contribution of various sectors of the UK economy. These policy recommendations should also be subject to scrutiny by the Committee on Climate Change.

## **2.4 Monitoring and early warning systems to ensure achievement of targets is on track**

While we do not support the placing of annual targets in primary or secondary legislation (i.e. Option 3 in Climate Change Bill - Explanatory Notes, section 5.1) we do consider that the legislation could be strengthened to provide consistency and accountability in target setting. We propose that, within the duty to report on proposals and policies for meeting carbon budgets, the Secretary for State be required to propose annual milestones for achieving the five-year carbon budget. These would complement the requirement within the current draft Bill for the Secretary for State to provide an annual report on actual carbon reductions.

## **2.5 Emissions from aviation and shipping**

Emissions from UK aviation are forecast to double in the next decade. The arguments put forward for establishing international leadership on setting targets in legislation would appear to apply equally in the area of aviation emissions. We do not consider the lack of international agreement on aviation emissions to constitute a strong argument for their exclusion from UK legislation.

If the draft Bill were to make provision for the UK contribution to aviation emissions it would provide a better basis for long-term planning in an increasingly significant sector.

## **3. Carbon Budgeting**

### **3.1 Borrowing from a later period to cover a deficit in emission reduction**

We appreciate that some flexibility in the timing of emissions reduction is helpful.

If, as proposed, the facility to borrow emission rights from a later period is restricted to 1% of that period it should not undermine the discipline of carbon budgets.

### **3.2 Carrying forward a surplus**

The rationale for carrying forward a surplus to a later period is questionable and we note that little restriction is placed on the extent to which this facility could be available. The draft Bill gives the impression that the whole of a surplus could be carried forward regardless of the cause that gave rise to this surplus. If a surplus arose as a result of one or two unusually mild winters there would in our view be no sound basis for carrying this forward. We think

therefore that some criteria for permitting carry forward ought to be developed with the intention of ensuring that any carry forward is properly justified.

### **3.3 The use of Carbon Credits**

Our approach to the purchase of carbon credits recognises that developed countries such as the UK have gained economic advantage from the availability of cheap fossil fuels. We recognise that carbon credits may be helpful in attracting investment in non-Kyoto countries to encourage and facilitate the development of such economies along different lines.

However the use of carbon credits must not enable the UK to duck its responsibility drastically to reduce domestic carbon emissions. The purchasing of one-third of the 2050 abatement effort with carbon credits<sup>3</sup> may provide a cost-effective path to reducing carbon but is inequitable. It enables the wealth developed, in part through cheap but damaging fossil fuels, to be used to perpetuate an unsustainable level of carbon output.

In our view the obligation on the UK to reduce carbon emissions should not be exported overseas. In practice this would require a limit to be placed on the overall contribution of carbon credits to achieving carbon reduction targets.

## **4. Adaptation**

The recommendations for statutory reporting on adaptation in our view provide an appropriate framework for coordination across government.

## **5. International implications**

We agree with the UK government's position that the developed countries must lead on emission reductions and that through the implementation of this bill the UK government is better placed to build a consensus for deeper commitment from the EU and possibly internationally.

Churches can contribute to these efforts by helping to build a strong call from civil society for legally binding targets. The churches in the UK maintain relationships with their partners overseas on a range of issues and climate change is a priority for many at this time. By taking a lead to set targets in UK legislation we strengthen the position of church leaders and other leaders in civil society in other countries. It provides them with greater confidence to call for similar action from their own governments.

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<sup>3</sup> A scenario outlined in the Climate Change Bill – Explanatory Notes para 5.1.37