

Consultation relating to the Environment Strategy for Wales 2005

Response by
Friends of the Earth Cymru

October 2005

Friends of the Earth Cymru

Friends of the Earth Cymru inspires solutions to environmental problems which make life better for people.

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- is part of the UK's most influential environmental campaigning organisation
- is part of the most extensive environmental network in the world, with over 60 national organisations across five continents
- supports a unique network of campaigning local groups working in communities across Wales
- is dependent upon individuals for over 90% of its income

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Introduction

Friends of the Earth Cymru welcomes the development of an Environment Strategy for Wales and the opportunity to input to the consultation process. We endorse the collective response of Wales Environment Link but wish to submit extra comments on climate change as this is the overarching issue that will have a major impact on 'our environment' and 'our future' this century.

Climate Change

The consultation document – 'Our Environment, Our Future, Your Views' - provides useful information about the science and impacts of climate change but understates the gravity of the problem and lists policy responses that are totally inadequate.

Scientific Evidence

The consultation correctly states that recent scientific evidence demonstrates that "the risks and impacts are more serious than predicted" in the IPCC's 3rd Assessment Report (2001) and points out that major changes, such as the melting of the Greenland ice sheet or the switching off of the Gulf Stream, may have a 'trigger point' which, once exceeded, would make the changes irreversible and bring about rapid change. There is now evidence that these 'trigger points' might have already occurred in the Arctic and in Siberia.

On August 11th, the New Scientist reported that research in Siberia showed that the world's largest peat bog is melting and that this could unleash billions of tonnes of methane, a potent greenhouse gas, into the atmosphere. On September 16th, the media reported the detection, by scientists from the National Snow and Ice Data Centre at the University of Colorado, of a massive loss of Arctic ice. Scientists fear that both of these could be 'trigger points' heralding irreversible change.

And although the consultation document anticipates (p28) that an increasing average temperature will produce "a longer growing season, enhanced yields and potential opportunities for agricultural diversification", the effects might be less positive. On September 29th, the UK's Natural Environment Research Council's Centre for Global Atmospheric Modelling reported that, during the 2003 heat-wave, plants produced more carbon dioxide than they absorbed from the planet. This means that ecosystems that currently absorb carbon dioxide from the atmosphere may in the future produce it, adding to the greenhouse effect.

The frightening prospect of the melting of the Greenland and west Antarctic ice sheets, which is referred to in the consultation, is becoming more real and demands urgent remedial action. Unfortunately, this is not happening and the latest data on greenhouse gas emissions show an increase from the 2002 figures quoted in the consultation.

Emissions

The 'Greenhouse Gas Inventories for England, Scotland, Wales and Northern Ireland: 1990-2003', produced by the National Environmental Technology Centre for DEFRA, the Scottish Executive, The National Assembly for Wales and the Northern Ireland Department of the Environment (September 2005), details how carbon dioxide emissions in Wales have risen by 0.2 per cent since 1990 while emissions in England, Scotland and Northern Ireland declined by just 6.9 per cent, 7.7 per cent and 3.4 per cent respectively. Whilst Wales has the poorest record, all these figures are disappointing as the UK should have achieved much greater reductions by now in order to meet the UK government's target of a 20% cut on 1990 levels by 2010. The Welsh Assembly Government's target of a 20% cut in carbon dioxide by 2020 will

also be missed on current trends. Recent research by Friends of the Earth has revealed that UK carbon dioxide emissions continued to rise in 2004 and during the first six months of this year and are now estimated to be over 5% higher than when the Labour government came to power in 1997. The long-term UK target of reducing carbon dioxide emissions by 60% by 2050 is now regarded by some as being too low to be an adequate response to emerging scientific evidence.

Although emissions in Wales of the overall basket of six greenhouse gases – carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons and sulphur hexafluoride - were an estimated 3.6% lower in 2003 than they were in 1990, they are worryingly adrift of the target figure of a 12.5% reduction. They are also substantially less than that achieved by England (15.9%) and Scotland (10.1%).

It should be noted that much of the reduction in emissions of greenhouse gases have been achieved coincidentally as a result of changes in industrial and agricultural practices rather than as a direct consequence of climate change policies. The decline in coal mining and manufacturing and the reduction in livestock numbers on farms have all had a significant impact. Methane emissions in Wales, for instance, declined by 34.5% during this period as a result of the decline of coal mining and the reduction of livestock numbers on farms, as well as the introduction of methane capture technologies on landfill sites. Sometimes, relatively simple measures have achieved substantial reductions in emissions of the greenhouse gases other than carbon dioxide. Emissions of perfluorocarbons declined in Wales by 78% during this period because of improved control measures in the aluminium industry and, in England, nitrous oxide emissions fell by 40% as a result of the installation of abatement measures in an adipic acid plant. Achieving reductions in the emission of the main greenhouse gas, carbon dioxide, is the main challenge and, in this, Wales is failing badly.

Policy Responses

According to the consultation document, the Sustainable Development Action Plan reflects the Assembly Government's commitment to ensuring that greenhouse gases in Wales are reduced and that Wales achieves UK and internationally agreed reductions. This offers some explanation as to why emissions have not been adequately reduced as the actions outlined in the Plan are far too weak to make much of a difference. An example of this is the requirement for the Assembly Government, its agencies and the NHS in Wales to report annually on the use of energy in its estates. While this simply requires a report on energy use, the UK government has set, in the DEFRA energy action plan, a target of cutting carbon emissions by 29% by 2011 in the central Government estates. At least a similar target should have been set in Wales.

The Assembly Government's energy efficiency action plan, 'Energy Saving Wales', is equally weak. This is little more than a reiteration of standard energy saving advice that has, over the years, failed to reduce energy use. It fails to set targets for energy reduction, timetables for delivery and mechanisms for measuring progress. This, again, compares very unfavourably with the UK government's plan which sets specific targets for energy saving and for greenhouse gas reductions and details means by which these can be achieved.

DEFRA's action plan also states (section 1.1.2) that the Sustainable Energy Act (2003) requires the National Assembly for Wales to designate an energy efficiency aim for residential accommodation. The UK Secretary of State has defined this aim as delivering savings of around 4.2 million tonnes of carbon by 2010. It appears that the Assembly Government has not yet fulfilled its obligations under the Act by setting itself a similar target.

Energy Saving Wales is strangely at odds with the Assembly Government's commendable targets for renewable energy. And while it encourages energy saving in the home, the 2004 Assembly budget stated that funding for the effective Home Energy Efficiency Scheme would remain constant for the next three years.

This year's Energy Route Map consultation paper demonstrates progress in some areas, such as increasing awareness of climate change and developing both the wind energy programme and a biomass strategy. There remains, though, a failure to give the required support to energy efficiency improvements or to even mention the promising tidal lagoon proposals for Swansea Bay and north Wales. The proposed LNG power stations at Milford Haven, which would waste three times as much energy as the Assembly's renewable energy target, will be a good test of the Assembly Government's response to the crises of climate change. These should only be supported if they are suitably sized and sited to allow the waste heat to be used locally in industrial locations such as the oil refineries.

The consultation document lists a number of public transport initiatives developed by the Assembly Government but this is in stark contrast to its transport strategy, announced last December, which is little more than a road builder's charter. This failure to address the real causes of climate change is summed up by the proposal in the Sustainable Development Action Plan to ensure "that lighting for trunk roads employs renewable technologies to deliver at least 20% energy saving". As worthy as this aim is, the real problem is the growing levels of traffic on the roads rather than the lighting on the sides. And on this, the Assembly Government is failing and looks set to worsen the problem with road building proposals such as the Gwent Levels Motorway.

Time and again there is a failure in the Assembly Government's policies to match rhetoric with effective action and the answer to CC1 in the consultation must be that the actions described will not succeed in reducing greenhouse gas emissions to the level required by national and internationally agreed targets.

Recommendations

Targets

The Environment Strategy should set clear and meaningful targets for year-on-year reductions of carbon dioxide. We believe that this should be at least three per cent a year. It is important that the targets are annual as long-term targets are much more likely to be neglected with actions being postponed to a later date. The need to achieve these targets should be one of the main commitments of the Environment Strategy as listed on page 5.

Climate Change Unit

The impending crises of climate change demands a radical shift in thinking and policy making at the Assembly. The Welsh Assembly Government should establish a cross-departmental Climate Change Unit that would ensure that the implications of climate change are given a high priority at all levels of policy making and operation.

Cabinet Responsibility

A member of the cabinet should be allocated clear high-level responsibility for climate change issues. This would include drafting and driving forward a programme of activities that would result in year-on-year reductions of at least three per cent in carbon dioxide emissions with regular reports on progress being made to the Welsh Assembly.

Awareness Raising

There needs to be a much better understanding, both within the Assembly and the country, of the gravity of the threat posed by climate change and of the many actions that can be taken to

reduce the emissions that are causing it. The proposal in the Energy Route Map to “raise awareness of the economic importance of energy and global warming” is welcome but should not be restricted to economic considerations only.

Energy

There needs to be nothing short of a revolution, comparable to the agricultural and industrial revolutions, in the production and use of energy if greenhouse gas emissions are to be reduced on a sufficient scale. This would require the setting of challenging targets for improvements in energy efficiency and for the introduction of combined heat and power (CHP) systems, significant increases in the production of heat and electricity from renewable energy sources, the application of efficient coal technologies and the development of cleaner fuels such as bio-diesel and hydrogen.

Transport

Proposals for building the Gwent Levels Motorway should be scrapped and replaced with a comparable expenditure in public transport improvements, such as tramway systems, throughout south east Wales. There should be a major shift in expenditure from road building to public transport and improvements in cycling and walking facilities. The successful congestion charging programme in London should be replicated in cities and towns in Wales.

Planning

There needs to be an overarching policy statement on planning. The Welsh Assembly Government has identified tackling climate change as a planning consideration in The Wales Spatial Plan and Planning Policy Wales with further reference in TANs 8 & 15. In all of these documents, climate change is dealt with in the same way as other policy objectives. This position is unsatisfactory for three reasons:

- There is no single comprehensive statement on climate change which communicates the vital significance of this issue to decision makers.
- There is a failure to recognise that climate change is a ‘special’ consideration for the planning system which may often need to take a pre-eminent place in regional and local policy and in development control decisions. In this sense, climate change is the ‘first among equals’ of considerations in the planning system.
- There has been an over-emphasis in planning policy on adaptation and mitigation rather than avoidance and reduction. Spatial policy must ensure that while proper measures are taken to deal with adaptation the first priority must be the avoidance of climate change by making carbon neutral decisions.

This planning policy statement could be backed by a ministerial statement and a cross sector launch. The document should deal with matters of principle and not detail and communicate the need for a step change in the way the planning system delivers the Government’s climate change agenda.

Environmental justice

The Environment strategy must deliver environmental justice through meeting our needs - and keep the environment safe - now and in the future. It must also ensure that people have a right to live in a safe and healthy environment without having a negative impact on other people in the UK or elsewhere. This means wholesale change in the way we live, work and consume. It should also address the fact that it’s the people with least power and money who are worst hit when the environment is damaged, and it’s the same people who are not getting their fair share of the benefits. We must ensure through the Environment Strategy that people

in Wales do not have a negative, disproportionate impact on any sections of the community – including the global community and future generations.

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