Summary of responses to the consultation on the draft Climate Change Bill from 13 March - 12 June 2007

October 2007
Executive Summary

Introduction and background

The UK Government is committed to addressing both the causes and consequences of climate change and to that end is bringing forward proposals for a Climate Change Bill. The Bill will introduce a clear, credible, long-term framework for the UK to achieve its goals of reducing carbon dioxide emissions and ensure steps are taken towards adapting to the impacts of climate change.

The Bill was published in draft on 13 March 2007 for full public consultation and pre-legislative scrutiny. Prior to finalising the Bill, the Government requested feedback from all interested parties in order that they have the opportunity to contribute their opinions at an early stage of policy development. The consultation document asked important questions about the shape of the policy proposals and what issues the Government should take into account, when developing the Climate Change Bill. Views were sought on all parts of the consultation document, and in particular responses to 20 specific questions posed throughout Section 5 and also in the partial Regulatory Impact Assessment. Consultation on the Bill ran through to 12 June 2007.

BOMEL was commissioned by Defra to analyse and report on the responses received to this public consultation.

Analysis methodology

The methodology broadly consisted of the following two main activities:

- Collection and collation of the responses.
- In-depth analysis of each response.

In order to allow a thorough and objective analysis of each of the individual responses, all of the consultation submissions were collected together from a variety of sources and in a range different formats and organised into one consistent format which was imported into a response database. Once all of the responses were in the database an in-depth analysis was conducted on each of the responses.

The first step of this analysis consisted of assessing each response in terms of whether or not the respondents had indicated:

- Overall agreement with the question (‘1. Yes’);
• Agreement but only under certain conditions (‘2. Qualified Yes’);

• A neutral response (‘3. Neutral’);

• That they did not agree with the question and why (‘4. Explained No’);

• That they did not agree with the question but with no explanation (‘5. No’).

In order to explore both the agreement qualifications and the explanations for not agreeing, a thematic content analysis was conducted. This involved assessing each response in detail and assigning ‘keywords’ which reflected the common themes being raised by respondents. The relevant keywords were then assigned to each of the responses in order to build an overall picture of how many responses contained a particular qualification / explanation, providing a clear picture of the strongest themes.

**Composition and number of consultation respondents**

In total there were 16,919 consultation respondents; this comprised 1,197 unique responses and a total of 15,722 campaign based responses. Campaign responses were identical in nature as the campaign organisers had provided individuals with standard wording to submit, whereas ‘unique’ responses were not identical to any other response.

It should be noted that the campaign responses focused predominantly on Questions 1, 2 and 3, and also, although less so, on Question 6 and 20. Although the majority of the overall sample (15,722 campaign responses versus 1,197 unique responses) was made up of campaign responses, because each of the campaign responses were almost identical in nature, the majority of the analysis focuses on the unique responses received.
The following table presents the number of unique responses received and categorised by sector.

**Number of unique responses received by sector**

<table>
<thead>
<tr>
<th>Sector</th>
<th>Number of respondents</th>
</tr>
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<tbody>
<tr>
<td>Trade association</td>
<td>45</td>
</tr>
<tr>
<td>Public sector</td>
<td>125</td>
</tr>
<tr>
<td>Non Governmental Organisation</td>
<td>195</td>
</tr>
<tr>
<td>Industrial / business</td>
<td>77</td>
</tr>
<tr>
<td>Individual</td>
<td>687</td>
</tr>
<tr>
<td>Energy supply industry</td>
<td>34</td>
</tr>
<tr>
<td>Academic / research</td>
<td>34</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>1,197</strong></td>
</tr>
</tbody>
</table>

The following table presents the number of responses received and categorised by each of the campaigns.

**Number of campaign responses received by campaign**

<table>
<thead>
<tr>
<th>Campaign</th>
<th>Number of campaign respondents</th>
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<tbody>
<tr>
<td>RSPB</td>
<td>4,746</td>
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<tr>
<td>Stop Climate Chaos / Take Action Now!</td>
<td>3,996</td>
</tr>
<tr>
<td>Friends of the Earth</td>
<td>3,589</td>
</tr>
<tr>
<td>World Development Movement</td>
<td>2,919</td>
</tr>
<tr>
<td>Crediton Climate Action</td>
<td>145</td>
</tr>
<tr>
<td>Christian Aid</td>
<td>133</td>
</tr>
<tr>
<td>Tearfund</td>
<td>129</td>
</tr>
<tr>
<td>Global Commons Institute (GCI) – Contraction and Convergence</td>
<td>50</td>
</tr>
<tr>
<td>People and Planet</td>
<td>15</td>
</tr>
<tr>
<td><strong>TOTAL CAMPAIGN RESPONDENTS</strong></td>
<td><strong>15,722</strong></td>
</tr>
</tbody>
</table>
Level of overall support for proposals put forward in draft Bill

The following table provides a summary of the overall level of agreement amongst the respondents to each of the 20 consultation questions. The table highlights the number of responses received to each question alongside how the responses were split (as both a number and percentage). (It should be noted that this table only represents the 1,197 unique responses received, and therefore does not include the 15,722 campaign responses).

The responses are also colour code in the table in order to aid interpretation. For each question, either the majority of responses (more than 50% of the overall number of responses) or the largest number of responses (but not more than 50% of the overall number of responses) has been highlighted in green or blue respectively. Furthermore, the second most significant number of responses for each question is highlighted in mauve.

Overall level of agreement with each consultation question (unique responses only)

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<tbody>
<tr>
<td></td>
<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
</tr>
<tr>
<td>1</td>
<td>1061</td>
<td>114</td>
<td>11%</td>
<td>895</td>
<td>84%</td>
<td>14</td>
</tr>
<tr>
<td>2</td>
<td>966</td>
<td>142</td>
<td>15%</td>
<td>637</td>
<td>66%</td>
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<tr>
<td>3</td>
<td>944</td>
<td>145</td>
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<td>696</td>
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</tr>
<tr>
<td>4</td>
<td>496</td>
<td>259</td>
<td>52%</td>
<td>170</td>
<td>34%</td>
<td>39</td>
</tr>
<tr>
<td>5</td>
<td>573</td>
<td>210</td>
<td>37%</td>
<td>309</td>
<td>54%</td>
<td>17</td>
</tr>
<tr>
<td>6</td>
<td>502</td>
<td>0</td>
<td>0%</td>
<td>262</td>
<td>52%</td>
<td>69</td>
</tr>
<tr>
<td>7</td>
<td>597</td>
<td>64</td>
<td>11%</td>
<td>316</td>
<td>53%</td>
<td>36</td>
</tr>
<tr>
<td>8</td>
<td>528</td>
<td>133</td>
<td>25%</td>
<td>208</td>
<td>39%</td>
<td>24</td>
</tr>
<tr>
<td>9</td>
<td>529</td>
<td>50</td>
<td>9%</td>
<td>296</td>
<td>56%</td>
<td>14</td>
</tr>
<tr>
<td>10</td>
<td>591</td>
<td>469</td>
<td>79%</td>
<td>85</td>
<td>14%</td>
<td>24</td>
</tr>
<tr>
<td>11</td>
<td>627</td>
<td>211</td>
<td>34%</td>
<td>379</td>
<td>60%</td>
<td>10</td>
</tr>
<tr>
<td>12</td>
<td>541</td>
<td>243</td>
<td>45%</td>
<td>252</td>
<td>47%</td>
<td>13</td>
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<td></td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
</tr>
<tr>
<td>13</td>
<td>521</td>
<td>294</td>
<td>56%</td>
<td>196</td>
<td>38%</td>
<td>10</td>
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<tr>
<td>14</td>
<td>504</td>
<td>75</td>
<td>15%</td>
<td>383</td>
<td>76%</td>
<td>15</td>
</tr>
<tr>
<td>15</td>
<td>653</td>
<td>223</td>
<td>34%</td>
<td>275</td>
<td>42%</td>
<td>12</td>
</tr>
<tr>
<td>16</td>
<td>476</td>
<td>45</td>
<td>9%</td>
<td>393</td>
<td>83%</td>
<td>13</td>
</tr>
<tr>
<td>17</td>
<td>497</td>
<td>152</td>
<td>31%</td>
<td>204</td>
<td>41%</td>
<td>71</td>
</tr>
<tr>
<td>18</td>
<td>323</td>
<td>122</td>
<td>38%</td>
<td>80</td>
<td>25%</td>
<td>87</td>
</tr>
<tr>
<td>19</td>
<td>581</td>
<td>252</td>
<td>43%</td>
<td>272</td>
<td>47%</td>
<td>18</td>
</tr>
<tr>
<td>20</td>
<td>507</td>
<td>178</td>
<td>35%</td>
<td>199</td>
<td>39%</td>
<td>91</td>
</tr>
</tbody>
</table>

*Note: Analysis of 1,197 unique responses only*

Key
- Green: Majority of responses (more than 50% of total no. of question responses) for that question
- Blue: Largest number of responses (but not more than 50% of total no. of question responses) for that question
- Pink: Second most significant number of responses (not more than 50% of total no. of question responses) for each question

Overall respondents were generally in support of the proposals put forward in the draft Bill, although many qualified their agreement by stating they only agreed under certain circumstances. In terms of Questions 2, 6, 7 and 9 there was a significant number of respondents that did not agree with the proposals put forward. However, it should be noted that a ‘No’ response to Question 6 actually indicated a positive endorsement that the factors set out in the Bill were sufficient to enable a review of targets and budgets.
Key Conclusions

Based on the thematic content analysis undertaken a number of key conclusions can be drawn. These are presented under the theme-based headings contained in the consultation document.

Targets and Budgets

Setting statutory targets

In terms of the Government setting a unilaterally 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%, 95% of the respondents (1009 out of 1061) either agreed with the proposal in full (11%) or agreed subject to qualification (84%). The key qualifiers that prevented full agreement with the proposals were related to the need for higher targets for both 2020 and 2050. An amalgamation of these key qualifiers represented 66% (819 out of 1,235 keywords) of the total keywords assigned to the various qualifications. This underlined the strength of feeling for reduction targets being increased. The qualifications were mirrored by the campaign responses, with RSPB, Stop Climate Chaos and Friends of the Earth proposing an 80% target reduction by 2050, whilst the World Development Movement proposed target reductions of 85% to 90%.

In terms of the Government keeping under review the question of moving to a broader system of greenhouse gas targets and budgets, and maintaining the focus at this stage on CO₂, 81% of the respondents (777 out of 966) either agreed with the proposal in full (15%) or agreed subject to qualification (66%). The primary qualifier that prevented full agreement with the proposals was related to respondents wanting all CO₂ emissions to be included from all sectors including aviation and shipping. This featured in 68% of the qualifications. The qualifications were mirrored by the campaign responses, with RSPB, Stop Climate Chaos and Friends of the Earth proposing that all CO₂ emissions should be included from all sectors including aviation and shipping.

Carbon budgeting

The draft Bill proposed that the UK should move to a system of carbon management based upon statutory five-year carbon budgets set in secondary legislation. The analysis showed that 89% of the consultation respondents (841 out of 944) either agreed with the proposal in full (15%) or agreed subject to qualification (74%). The primary qualifier that prevented full agreement with the proposals was the request for annual targets / budgets. In total, the keywords relating to this issue accounted for
65% (469 out of 723 keywords) of the total keywords assigned to the various qualifications. This underlined the strength of feeling for annual targets / budgets / milestones. However, it should be made clear that whilst some respondents called for fixed annual targets / budgets, some respondents called for annual targets / milestones within the proposed five year budget period. There was a broadly similar representation of sectors for both proposals, however, there were more responses from academic / research groups and individuals for fixed annual targets / budgets, whereas there were slightly more responses from Non Governmental Organisations for annual targets / milestones within a longer five year budget period.

These qualifications were also highlighted by the campaign responses, with RSPB, Stop Climate Chaos and Friends of the Earth proposing annual budgets / targets and the World Development Movement proposing annual targets / milestones within the five year budget.

In relation to having at least three budget periods in statute at any one time, of the 496 responses to Question 4, a total of 86% agreed that there should be at least three budget periods in statute at any one time. More specifically, 34% agreed but only under certain conditions. Of the qualifications to agreement given, the most significant were that carbon reduction targets should be based on annual milestones therefore creating fifteen budget periods, the budget periods should actually define the whole pathway to 2050 and the budget periods must be regularly reviewed and remain flexible in light of new scientific evidence.

**Reviewing targets and budgets**

On the issue of having a power to review targets through secondary legislation, to ensure there is sufficient flexibility in the system, 37% agreed with the proposal in full and 54% agreed subject to qualification. The key qualifiers that prevented full agreement with the proposals were the need for suitably rigorous controls over any potential changes, and that there should be no lowering of the targets (combined with suggestions that the targets should only increase). In terms of any other factors that would enable a review of targets and budgets, 52% of the respondents felt that additional factors were required, whilst 34% of the respondents felt that no additional factors were required. The key additional factors that respondents felt should be considered in addition to those already stated were: budgets and / or targets should be broken down by industry sector (20% of factors); and advances in new technology for combating climate change (9%).

A total of 4,746 individuals, responding via the RSPB campaign, suggested that carbon dioxide emissions must be broken down by Government into targets for each emitting sector as a requirement under Section 6 of the Bill. The Christian Aid and
People and Planet campaigns (jointly comprising 148 individuals) felt that UK companies should publish their emissions.

**Counting overseas credits towards the budgets and targets**

In terms of whether effort purchased by the UK from other countries should be eligible in contributing towards UK emissions reductions, 54% of the respondents (380 out of 597) either agreed with the proposal in full (11%) or agreed subject to qualification (53%). The key qualifiers that prevented full agreement with the proposals were: limits should be set on the amount of emissions that could be purchased from overseas (primarily to focus effort on cutting domestic emissions within the UK) (29% of qualifications); trading schemes should be sufficiently robust (23%); and the importance of focusing effort on cutting domestic emissions within the UK (22%). Interestingly, those objecting to the proposals raised similar issues to those respondents qualifying their acceptance of these proposals.

**Banking**

On the issue of carrying over any surplus in the budget, 64% of the respondents (341 out of 528) felt this was reasonable and either agreed with the proposal in full (25%) or agreed subject to qualification (39%). The key qualifiers that prevented full agreement with the proposals were: the need to maintain momentum (27%); limit the amount being carried over (12%); review / adjust the targets / budgets (12%); and review and adjust if science / technology changes (11%).

**Borrowing**

In terms of allowing limited borrowing between budget periods, 65% of the respondents (346 out of 529) either agreed with the proposal in full (9%) or agreed subject to qualification (56%). The key qualifiers that prevented full agreement with the proposals were: respondents felt that borrowing should only be allowed in response to unforeseen or exceptional events (24% of qualifications); and the need to apply limits to borrowing (14%).

**Compliance with carbon budgets and targets**

The Bill proposed that the Government should have a legal duty to stay within the limits of its carbon budgets, and 94% of respondents agreed that this should be the case. More specifically, 14% agreed but only under certain conditions. Of the conditions to agreement given, 27% (28 out of 105 qualifications) stated that the Bill should outline what the penalties would be if the Government failed to do this. In addition, 12% (13 out of 105 qualifications) stipulated that the Bill must have
mechanisms built in for reviewing the situation and reducing the risk, and 12% (13 out of 105 qualifications) questioned whether Judicial Review was the right mechanism for calling the Government to account.

The Committee on Climate Change

The need for an independent analytical organisation

Around 34% of the respondents who commented on the issue agreed that establishing an independent Body would improve the institutional framework for managing carbon in the economy without giving any caveats. A further 60% said they agreed but only under certain conditions. Of the conditions given, the most significant percentage, 43% (195 out of 452 qualifications), underlined that any Body that was established must be truly independent and without vested interest.

Functions of the Committee on Climate Change

Furthermore, 92% of those who commented on the issue agreed that the Committee should have an advisory function. More specifically, 47% agreed, but specified certain conditions for agreement. Of the conditions given, 27% (76 out of 285 qualifications) said the role should be more than just advisory and a further 18% (50 out of 285 qualifications) stipulated the Body must have strong regulatory / decision making powers to ensure it could carry out the required task with sufficient ‘teeth’.

In terms of the analytical role of the Committee, 94% agreed that the Committee should have a strongly analytical role. More specifically, 38% agreed, but specified certain conditions for agreement. Of the conditions given, the most significant (53%) was that the role should be more than just analytical.

Factors for the Committee on Climate Change to consider

In terms of the factors for the Committee on Climate Change to take into account in assessing the emissions reduction pathway, a total of 91% of respondents agreed with the factors proposed in the draft Bill. More specifically, 76% agreed, but specified certain conditions for agreement. Of the conditions given for agreement, 25% (56 out of 226 qualifications) of respondents gave a range of specific caveats or raised particular questions regarding the factors. Around 21% (48 out of 226 qualifications) wanted to ensure that there would be an appropriate balance / weighting of factors considered when assessing the emissions pathway; and 20% agreed but only on the basis of a wide range of solutions they themselves proposed (45 out of 226 qualifications).
In addition to requiring certain caveats with regard to the factors proposed, a number of respondents also suggested further factors that they felt the Committee should take into account. The most significant factors included International equity, people, community, society, behavioural and educational factors, other environmental factors, social and economic factors, the global impact of climate change, transport (including aviation and shipping), adaptation issues, and resources (e.g. water, waste, fuel supplies etc.).

**Membership and composition**

With regard to whether the Committee on Climate Change should be comprised of technical experts rather than representatives of stakeholder groups a total of 76% respondents agreed that the Committee should be comprised of technical experts. More specifically, 42% agreed, but specified certain conditions for agreement. Of the conditions given, 27% (82 out of 309 qualifications) stated that stakeholders should still be included in a consultation role; 23% (70 out of 309 qualifications) agreed on the basis the group was truly independent / impartial and did not have any vested interests; and 17% (52 out of 309 qualifications) called for an expert on international development. These findings were mirrored by the World Development Movement campaign (comprising 2,919 individual respondents) which called for an international development expert on the independent committee.

The consultation document also provided respondents with a list of areas of expertise that the Committee should have. Of those who commented 92% agreed that the areas of expertise outlined in the consultation document were correct. However 83% of respondents agreed with the areas of expertise, but specified certain conditions. Of the conditions given, 27% (47 out of 177 qualifications) emphasised the need for expertise in the areas of science and engineering; 17% (30 out of 177 qualifications) felt the economic and business expertise were less important than the other areas; and 14% (25 out of 177 qualifications) gave specific suggestions with regard to the areas of expertise the Committee should include. However, common themes were not apparent.

In addition to expressing certain concerns with regard to the areas of expertise proposed, a number of respondents also suggested further areas of expertise they felt should be represented on the Committee. The most significant areas included expertise on international equity and development, people / social behaviour, industry (particularly transport), environmental impacts and adaptation.
Enabling Powers

Extending the suite of domestic trading schemes

In terms of taking enabling powers to introduce new trading schemes, 72% of respondents agreed with this principle. More specifically, 41% agreed but only under certain conditions. Of the conditions given, the most significant (41% - 50 out of 122 qualifications) wanted further scrutiny of the powers and the proposals put forward. This view was put forward by a representative balance of all sectors, although individuals were under-represented. Responses from the energy supply industry were relatively strongly represented.

Benefits and structure of enabling powers

On the issue of whether these powers are sufficient to introduce effective new policies via secondary legislation, 63% of the respondents (202 out of 529) either agreed with the proposal in full (38%) or agreed subject to qualification (25%). The key qualifiers that prevented full agreement with the proposals were: agreement with the powers as long as they were committed to and enabled the reduction of emissions (29% of qualifications); and suggestions for further powers (26%). With regard to the commitment to the reduction of powers this came from the public sector, Non Governmental Organisations, individuals and academic / research groups. In terms of suggesting further powers, all sectors were represented in this view with the exception of individuals.

Reporting

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

The consultation document proposed 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). Around 90% of the respondents (524 out of 581) either agreed with the proposal in full (43%) or agreed subject to qualification (47%). The key qualifiers that prevented full agreement with the proposals were: progress should be reported against compliance with an annual budget period rather than a five-yearly one (31% of qualifications); concern over the need to shorten the two-year time lag on reporting the final validated data (14%); and the budget period should be shorter than the five years proposed (10%).
Adaptation

On the issue of whether statutory reporting is the best way to drive forward progress on adaptation, 74% agreed that it was. However, more specifically, 39% agreed but only under certain conditions. Of the conditions given, 23% (52 out of 231 qualifications) indicated that either the Climate Change Bill or the statutory reporting must include details on the UK’s contribution to adaptation work overseas; 15% (35 out of 231 qualifications) felt that the Governments’ current approach to addressing adaptation required more attention; and 14% (33 out of 231 qualifications) said that although they welcomed statutory reporting, this would not be sufficient in isolation.

The RSPB campaign (4,746 respondents) called for the Government to establish a stronger obligation to develop and deliver a cross-Governmental action programme on adaptation to climate change, with adaptation for birds and other wildlife as one of its key themes.

The Stop Climate Chaos and Tearfund campaigns (in total comprising 4,125 individuals) asked that the Bill must commit the UK to act at home, and take its fair share of the action needed across the world, to help people and natural environments to adapt.

Other comments

In addition to the responses received to the 20 consultation questions, 684 ‘other comments’ were also received. The primary themes identified included:

- The need for behaviour change both among individuals and organisations to encourage them to reduce their carbon consumption (13% - 13 out of 987 keywords);
- Further requests for the inclusion of aviation and shipping emissions (9% - 90 out of 987 keywords);
- Welcoming of the draft Climate Change Bill (6% - 57 out of 987 keywords);
- Concern that the detrimental effects of climate change would impact disproportionately on the world’s poorest nations (5% - 46 out of 987 keywords).

In terms of ‘other comments’ from the campaigns, the RSPB campaign (comprising 4,746 individual respondents) called for the Bill to include a duty on Government to achieve its targets in a sustainable way. Crediton Climate Action (a petition with 145
signatures) asked that the Government provide sufficient funding for grants so that householders and communities can invest in renewable energy. The Global Commons Institute (GCI) campaign (comprising 50 individual respondents) asked that the Government consider the emissions reduction mechanism Contraction and Convergence (C and C) as devised by the Global Commons Institute (see www.gci.org.uk/briefings/ICE.pdf).

**Key conclusions by sector**

The consultation findings were also analysed by sector, providing a more in-depth overview of how certain groups responded to the various key issues contained within the draft Bill. In general, there was a reasonably representative distribution of the sectors throughout the responses; however, some interesting differences emerged. The following sections provide areas where certain sectors were either particularly over, or under, represented in commonly held views. This enables a clear overview of which sectors feel most strongly or least strongly about particular themes coming through from the consultation responses.

**Non-Governmental Organisations**

In terms of including emissions from aviation and shipping in the UK’s targets and making carbon budgets annual, the non-Governmental organisations were strongly represented compared with other sectors. In terms of the role of the Committee on Climate Change, a significant number of respondents felt the Committee should have a role that was more than just analytical; however, non-Governmental organisations appeared under-represented in this view.

**Public Sector**

In terms of including emissions from aviation and shipping, although a reasonable number of public sector bodies agreed with this view, they were still slightly under-represented when compared with other sectors of a similar size.

In terms of the role of the Committee on Climate Change, a significant number of respondents felt the Committee should have a role that was more than just analytical. However, public sector bodies appeared under-represented in this view. In terms of the view that the Committee would yield better results if it were comprised of both technical experts and stakeholder groups, public sector bodies were a little over represented.

In terms of the Government’s adaptation policy generally needing more attention, public sector bodies were a little over-represented.
**Industrial / business**

In terms of including emissions from aviation and shipping in the UK’s targets, industrial / business groups were under-represented. However, they did indicate a relatively strong view that the Government should focus on all GHG’s immediately. With regard to making carbon budgets annual, industrial / business groups were under-represented.

In terms of the Committee having an advisory function, industrial / business groups were slightly over-represented in comparison with other sectors that had also provided a qualified agreement.

In terms of adaptation reporting not being sufficient in industrial / business groups were not represented at all.

**Energy supply industry**

In terms of increasing carbon emission reduction targets to 80% or more and including aviation and shipping in the UK’s targets, the energy supply industry was under-represented. However, it did indicate a relatively strong view that the Government should focus on all GHG’s immediately. With regard to making carbon budgets annual, not one energy supply stakeholder indicated they wanted this change to the draft Bill.

In terms of the Committee, the most significant agreement qualification was that the Committee should have a role that was more than just advisory. However, not one respondent from the energy supply industry expressed this view.

With regard to the UK counting credits bought overseas towards its own domestic emissions reduction targets, the energy supply industry was strongly represented. The main reason for disagreeing with purchasing effort from overseas was that the UK should be focusing on domestic action. Accordingly the energy supply industry was a little under-represented in this view.

With regard to the principle of taking enabling powers to introduce new trading schemes, the most significant qualification for agreement was respondents call for further scrutiny of the powers and the proposals put forward. Compared with other sectors, responses from the energy supply industry were relatively strongly represented.
In terms of the strongly held view that borrowing from future budgets may lead to unaffordable delays in tackling climate change, the energy supply industry was considerably under-represented, as they did not hold this view at all.

**Academic / research**

In terms of including emissions from aviation and shipping, this view was strongly held by academic / research groups compared with some other sectors.

With regard to the commonly held view that a Committee should be established as long as they were truly independent and that the Committee should have a broad range of input from all sectors, academic / research groups appeared to be under-represented. This under-representation could be because academic / research groups are traditionally used to working as ‘independent’ bodies themselves with a broad range of input, and therefore they did not feel the need to emphasise this requirement for the Committee. Instead, they were reassured about the independence of the Body, particularly as the Question had also stipulated this.

The main reason for disagreeing with purchasing effort from overseas was that the UK should be focusing on domestic action. However, academic / research groups were a little under-represented in this view.

In terms of the Government’s adaptation policy generally needing more attention, academic / research groups were not represented at all.

**Individuals**

With regard to the desire for the Bill to include emissions from aviation and shipping and have annual targets / budgets, individuals were over represented on these views compared with other groups. However, it should be noted that a large number of individuals did respond to these issues in the consultation.

With regard to the UK counting credits bought overseas towards its own domestic emissions reduction targets, individuals were relatively under-represented.

Significant common themes were that the Committee should have a role that was more than just advisory, more than just analytical and should have a broad range of input from all sectors. However, individuals were slightly under-represented in all three of these views.

In terms of the strongly held view that borrowing from future budgets may lead to unaffordable delays in tackling climate change, individuals were also slightly under-represented in this view.
With regard to respondents wanting further scrutiny of the enabling powers and proposals for trading schemes, compared with other sectors, individuals were relatively under-represented.

In terms of adaptation reporting not being sufficient in isolation, individuals were also under-represented in this view.

**Trade Associations**

In terms of increasing carbon reduction targets to 80% or more, including emissions from aviation and shipping in targets and having annual milestones, trade associations were relatively under-represented compared with other sectors.

With regard to the UK counting credits bought overseas towards its own domestic emissions reduction targets, trade associations were strongly represented amongst the sectors that agreed (with qualification) with this proposal.

**Key findings by stakeholder**

In terms of the emissions targets set down in the draft Bill, the most significant request was for the 2050 reduction target to be increased. The largest number of responses asked for it to be set at 80%, but a significant number of respondents said it should be higher than 80% or simply higher that the current 60% level.

In terms of academic / research groups, the University of Leeds, University of Sheffield and London School of Hygiene & Tropical Medicine all said they would like to see targets at more than 80%. The Tyndall Centre and The Royal Society said they would like to see targets higher than 60%. On this issue, the Tyndall Centre explained:

“Within the draft Bill it is clearly stated that “60% by 2050 and 26-32% by 2020 …are unilateral targets which we would only change in the event of significant developments in scientific knowledge about climate change or in international law or policy which made it appropriate to do so.” This Note suggests that the targets within the draft Bill are neither based on IPCC AR4 science nor can be reconciled with the UK and EU commitment/policy to make a ‘fair’ contribution to “limiting average global temperature increases to no more than 2°C above pre-industrial levels”. Consequently, the Government’s two criteria for revisiting the Bill’s targets are already met, and hence the targets should be a legitimate
subject of major reform during the passage of the Bill though Parliament.”

A great deal of support also came from Non Governmental Organisations, including the Northern Ireland (NI) Environment Link, Friends of the Earth, World Wide Fund for Nature (WWF-UK), World Development Movement and Royal Society for the Protection of Birds. The WWF-UK explained:

“…the Bill must aim for an emission reduction of at least 80% by 2050 from 1990 levels…the 60% target proposed by the Government is based on a recommendation by the Royal Commission on Environmental Pollution in 2000…however, the science has moved on considerably”

The World Development Movement further explained:

“The May 2007 IPCC summary report on mitigation outlined that for the average global temperature increase to be kept to 2.0 C-2.4 C requires stabilisation at 445-490ppm of CO2eq in the atmosphere. This in turn requires global yearly emissions to be reduced by between 50 to 85 per cent by 2050, on current levels. Because the UK emits more than double the worldwide average CO2 per person, the UK has to reduce emissions by between 80 and 90 per cent by 2050, on current levels. This translates into a 40 per cent cut by 2020.”

Increasing the target was also supported by the Energy Institute and British Energy. British Energy stated:

“Climate change poses an unprecedented global threat and indeed recent analysis suggests the target for reducing carbon emissions by 60% by 2050 may not go far enough to avoid a rise in global temperature by the 2 degrees C that is thought may bring on the more dangerous consequences of global warming. The Stern Review also suggests that delaying action to reduce emissions simply leads to an increase in the cost and difficulty of achieving the same level of reductions at a future date.”

A number of industrial / business groups also wanted the targets higher (e.g. Climate Change Capital, Ecozest Ltd), as well as public sector bodies (e.g. Plymouth City
Council, Northam Town Council, Ryedale District Council, Pendle Borough Council, Newbury Town Council, Essex County Council). Academic / research groups such as Cambridge University, University of Birmingham, Environmental Association for Universities and Colleges, University of East Anglia and the Open University were also looking for higher targets.

Furthermore, six campaigns called for the Bill to increase the Government’s carbon emissions reduction target to 80%, in line with the most up to date scientific evidence.

The Stop Climate Chaos campaign stated:

“Latest mainstream science tells us we need at least 80% CO2 cuts by 2050, not 60%. The 60% target is based on old evidence, and the law needs to be up to date if it's to work”.

The World Development Movement campaign suggested the carbon emissions reduction target should actually be increased even further to between 85% and 95%.

In terms of Question 2, one of the most significant issues raised was that emissions from aviation and shipping should be included in targets. Academic / research groups supporting this view included the Tyndall Centre, The Royal Society and the Sussex Energy Group. The Tyndall Centre explained:

“To estimate the ‘real’ UK carbon budget between 2000 and 2050, it is necessary to estimate those emissions from international aviation and shipping for which the UK is responsible, and to add these emissions to those considered within the Bill (i.e. the 5.5-6GtC range)”

Furthermore, The Royal Society stated:

“We support the proposal to put in statute emission reduction targets for 2020 and 2050. However, we are concerned that the targets are too weak and do not go far enough to deliver the significant cuts in emissions required if we are to avoid the dangerous impacts of climate change, particularly as non-CO2 greenhouse gases, and aviation, shipping and land-use emissions are not included in the framework.”

Many Non Governmental Organisations supported the inclusion of emissions from aviation and shipping, including WWF-UK, The Environment Council, NI Environment Link, Friends of the Earth, National Trust, Christian Aid, Stop Climate Chaos and the Royal Society for the Protection of Birds. The World Development Movement asked:
“WDM urges the government to include UK aviation’s CO2 and non-CO2 greenhouse gas emissions within the scope of the bill from the outset and take action to curb the growth in these emissions rather than postponing full inclusion of aviation until some future date when a possible international accord might have been reached and UK aviation emissions are much larger and need to be significantly cut”

Public sector support came from organisations such as the North East Assembly, NHS Foundation Trust, Essex County Council, Eastleigh Borough Council, Watford Borough Council, Plymouth City Council and Northam Town Council. Trade association support included the National Farmer’s Union.

Furthermore seven campaigns felt that the Bill should stipulate that the Government includes carbon emissions from aviation and shipping in its reduction targets. It was felt these industries must be included as they are the “fastest growing greenhouse gas polluters” (Tearfund). The World Development Movement campaign said:

“Aviation and shipping emissions must be included in CO2 reduction targets to account for the true cost of climate change. The draft bill sets out a planned 60 per cent emissions cut by 2050. If we achieve this while allowing aviation to grow at current rates, the real drop in emissions will only be 40 per cent.”

The most significant response in terms of managing the carbon budget was the desire for fixed annual targets / budgets or annual targets / milestones within the proposed five year budget period.

In terms of fixed annual targets / budgets a number of Non Governmental Organisations supported this view, including the Northern Ireland (NI) Environment Link, Campaign for Clean Air in London, several regional Friends of the Earth groups, the Church of England, National Union of Students, Tearfund, and The Environment Council. Public sector support included the NHS Foundation Trust, Strategic Aviation Special Interest Group and the East of England Regional Assembly (EERA).

Furthermore, six campaigns felt that the UK should move to a system of carbon management based upon fixed annual targets / budgets. The Christian Aid campaign stated:

“…there must be annual carbon budgeting or ‘milestones’. In the past year, the UK’s CO2 emissions have increased by
1.25 per cent, illustrating the need for close monitoring, year on year. Annual budgets are the only way to make sure that cuts are happening as agreed.”

In terms of annual targets / milestones within the proposed five year budget period a number of Non Governmental Organisations supported this view, including the WWF-UK, Friends of the Earth, Stop Climate Chaos and the RSPB. Public sector support came from Kirklees Council, Manchester City Council, Newbury Town Council, Essex County Council, Northamption County Council and Northam Town Council.

The World Development Movement Campaign called for

“…legally binding annual targets…alongside a carbon budget…”

In terms of whether effort purchased by the UK from other countries should be eligible in contributing towards UK emissions reductions, the majority of respondents agreed but only under certain conditions. Many felt that there should be a limit on the amount of emissions that could be purchased from overseas. In terms of the energy supply industry this view was supported by Scottish Power, Energy Institute, Fuel Cells UK and EDF Energy. Industrial / business groups in support of this included Atkins, Rothschild, JCB, AXA Insurance and United Utilities. Non Governmental Organisations included WWF-UK, National Trust, Christian Aid, Sustrans and the National Society for Clean Air. In terms of public sector bodies, support came from Scottish Environment Protection Agency, Clackmannanshire Council, Hertfordshire County Council and the Environment Agency. On the issue of limits required to overseas trading, the Greater London Authority stated:

“The Government should state at the outset that its use of internationally traded carbon credits to meet its statutory targets will be limited and capped.”

Another agreement qualification was that trading schemes needed to be robust, this was supported by a range of stakeholders including Scottish Water, Friends of the Earth, Shell UK Limited, British Wind Energy Association (BWEA), RSPB and Coca-Cola Enterprises. BWEA stated:

“It is reasonable that credits bought in various international markets be counted towards UK targets, within limits. Government should be careful, however, to ensure that project-level credits (ie JI and CDM) should be of the highest quality in order not to undermine domestic emission
reductions. Any credits bought directly by Government should be verified to the highest standards, possibly restricting them to certain types to project, and Government should also take steps to encourage private-sector buyers to exercise similar discretion."

The third most significant qualification was that the Government should still aim to focus on domestic action. This was supported by the Greater London Authority, TUC, the Carbon Trust, Natural England, the British Cement Association and Cemex UK. The Carbon Trust stated:

“The appropriate level of domestic action versus international purchase of carbon credits to meet domestic targets is another feature on which the Government will be given independent advice from the proposed Committee on Climate Change. The Committee will take due account of both the need for action based on climate change science as well as the potential impacts on the UK economy and the competitiveness of UK firms. We believe that stimulation of international abatement through Joint Implementation and Clean Development Mechanism has a role but needs to be balanced by true domestic action.”

In terms of allowing limited borrowing between budget periods, the majority of responses agreed with this principle but only under certain conditions. The main qualification was that borrowing should only be allowed in the event of unforeseen circumstances or if exceptional events occurred. Key stakeholders in support of this included the Sussex Energy Group, Friends of the Earth, Shell UK Limited, National Grid, the Energy Institute, Christian Aid, JCB, RSPB and E.ON UK. The Energy Institute explained:

“Yes, but only to a very limited degree, to allow adjustment for unforeseen circumstances late in a budget period, and ensuring that the achievement of the long term target is not compromised. Within this, the use of an interest rate attached to such borrowing might be a mechanism for indicating the extra value of earlier emissions reductions”

In terms of whether or not the Committee on Climate Change should be responsible for an independent annual report on the UK’s progress towards its targets, many responses were in agreement with this proposal. The National farmers’ Union were in favour of the proposals and stated:
“We support the proposal for the Committee on Climate Change. There is certainly a need for such a body, to independently analyse results and review targets. The proposed annual reporting to Parliament, and the obligation on Government to respond, is an important safeguard. We look to Parliament to make appropriate arrangements for the careful scrutiny of the reports and the responses by Government.”

SUSTRANS stated:

“Yes. Provide annual reporting against those carbon budgets, scrutinised by a genuinely independent committee with the power to advise on the level of corrective action to be taken if carbon emissions go over budget.”

On the issue of speeding up reporting timescales, the WWF stated:

“WWF is also concerned at the long delays which are proposed for the reporting process. The consultation suggests that the Government will lay its statement of emissions in 2009 before Parliament in March 2011. The Committee would then report in June or July, but the Government’s response would not be expected until October 2011 - nearly two years after the end of the year in question. The Government also cites a two-year lag in the international reporting framework to argue that its assessment report for the 2008-12 budget period would not be published until spring 2014. These delays appear to be too long to allow policies to be toughened or fine-tuned if the Committee finds that the Government is off track.”

In terms of whether statutory reporting is the best way to drive forward progress on adaptation, a significant number of responses agreed and many agreed but only under certain conditions. The main condition was that the Bill and / or reporting must include adaptation work carried out overseas. Key stakeholders that put forward this view included those from industrial / business groups (e.g. AXA Insurance, Cemex UK), Non-Governmental Organisations (e.g. Christian Aid, Stop Climate Chaos, People and Planet, Tearfund and many regional divisions of Friends of the Earth) and several public sector bodies such as Newbury Town Council and City of Bradford Metropolitan District Council. On this issue Tearfund stated:
The Bill currently only refers to adaptation in the UK, but the world's poorest and most vulnerable people will be hit first and worst by climate change. The Bill should provide statutory reporting commitments for the UK’s adaptation work overseas, as well as making a commitment to take our fair share of the action needed across the world to help people to adapt. This must include going beyond existing aid targets to protect communities in poor countries who are least responsible for creating the problem.

Several campaigns also commented on this issue, with the RSPB campaign calling for the Government to:

“…establish a stronger obligation to develop and deliver a cross-Governmental action programme on adaptation to climate change, with adaptation for birds and other wildlife as one of its key themes”.

The Stop Climate Chaos campaign asked that:

“The Bill must commit the UK to act at home, and take our fair share of the action needed across the world, to help people and natural environments to adapt” (Stop Climate Chaos).

In terms of ‘other’ comments made, which were not in direct relation to the 20 consultation questions, the RSPB campaign stated that:

“Section 6 of the Bill should include a duty on Government to achieve its targets in a sustainable way. Whilst the possibility of catastrophic climate change is very real, it is not the only threat to our natural environment and we must ensure that we address it in ways that do not further damage biodiversity. We can meet our targets in sustainable ways by focussing on measures such as energy efficiency, the development of a broad mix of renewables and demand management but there is a risk that biodiversity could be harmed as the result of ill-considered mitigation measures. A good example of where this is already being realised is inappropriately sited large-scale wind farm developments, such as that proposed for the Isle of Lewis. In order to prevent similar mistakes in the
future, all policies proposed for the reduction of carbon dioxide emissions must be assessed for their sustainability.”

The Global Commons Institute (GCI) campaign said:

“If there is still to be any meaningful chance of achieving the objective of the UN Treaty, very deep cuts in human emissions and the restoration of natural sinks are needed globally, quickly and organised in a globally rational and equitable mechanism. The only emissions reduction mechanism that can be deployed to this purpose is Contraction and Convergence (C and C) as devised by the Global Commons Institute which already has enormous support (see www.gci.org.uk/briefings/ICE.pdf).”

Key messages

Based on an overall assessment of all of the findings, it was felt that the strongest messages coming through from the respondents were as follows:

1. Carbon reduction targets should be increased to 80% or more.
2. Emissions from aviation and shipping should be included in carbon reduction targets.
3. Carbon reduction management should be based on annual budgets / targets / milestones.

Overall respondents were generally in support of the proposals put forward in the draft Bill, although many qualified their agreement by stating they only agreed under certain circumstances.

Responses to Questions 2, 7 and 9 indicated the highest level of disagreement with the proposals put forward.

In terms of Question 2 the key explanations for disagreement with the proposals were that respondents felt the focus should be on all greenhouse gases (accounting for 65% of the explanations); or they wanted all CO2 emissions be included from all sectors including aviation and shipping (26%). In terms of including emissions from aviation and shipping, this was also raised by respondents agreeing with the proposal, as well as by respondents in the ‘other comments’ section, underlining the strength of feeling for including emissions from aviation and shipping in carbon budgets. This view was most strongly held by individuals, non-Governmental
organisations and academic / research groups. With regard to focusing on all greenhouse gases, there was a stronger representation of views from industrial / business groups, trade associations and the energy supply industry.

With regard to Question 7 the most significant reason given for not agreeing was that the Government should focus on its own domestic action rather than buying credits from overseas. In general, there was a representative balance of all of the main sectors sharing this view, however, the energy supply industry and academic / research groups were a little under-represented.

The primary explanations for objecting to the proposals in Question 9 was that the ability to borrow from future budgets would lead to unaffordable delays in tackling climate change; borrowing should not be needed if the budget is planned appropriately; and concern about the burden such borrowing would place on future budgets (and the fact that it may not prove possible to ‘pay back’ borrowed emissions). In terms of the concern that borrowing from future budgets may lead to unaffordable delays in tackling climate change, there was a representative balance of all of the main sectors featured in this group. However, the energy supply industry did not express this view at all and individuals were slightly under-represented.