

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**.

To help us analyse responses, please provide details of yourself or your organisation (* if appropriate) below.

In line with Defra's policy of openness, at the end of the consultation period copies of the responses we receive may be made publicly available through the Defra Information Resource Centre, Lower Ground Floor, Ergon House, 17 Smith Square, London SW1P 3JR. The information they contain may also be published in a summary of responses.

If you do not consent to this, you must clearly request that your response be treated confidentially. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request.

You should also be aware that there may be circumstances in which Defra will be required to communicate information to third parties on request, in order to comply with its obligations under the Freedom of Information Act 2000 and the Environmental Information Regulations.

Defra's confidentiality statement in full can be found at www.defra.gov.uk/corporate/consult/climatechange-bill/letter.htm

Name	Johanna Field
Organisation / company *	British Youth Council (BYC)
Job title *	Head of Policy and Public Affairs
Department *	
Address	Mezzanine 2 1 London Bridge London SE1 9BG
Email *	johanna.field@byc.org.uk
Telephone *	020 7785 6459
Fax *	
Website *	www.byc.org.uk

Organisation Type	Please mark/give details as appropriate	
Non Governmental Organisation (NGO)	<input checked="" type="checkbox"/>	
Public sector (e.g. local / central government, hospitals, universities) <i>(please give details)</i>	<input type="checkbox"/>	
Retail sector (e.g. supermarkets) <i>(please give details)</i>	<input type="checkbox"/>	
Service sector (e.g. cinemas, hotel chains, banks) <i>(please give details)</i>	<input type="checkbox"/>	
Energy supply industry	<input type="checkbox"/>	
Heavy industry / manufacturing	<input type="checkbox"/>	
Property management	<input type="checkbox"/>	
Trader / verifier	<input type="checkbox"/>	
Academic / research	<input type="checkbox"/>	
Individual	<input type="checkbox"/>	
Other <i>(please give details)</i>	<input type="checkbox"/>	

NB: on the form below, please leave the response box blank for any questions that you do not wish to answer. Any other comments can be recorded in the box at the end of this form. All boxes may be expanded as required.

Targets and Budgets

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%?

BYC surveyed a small sample of young people and they almost unanimously agreed that the government is right to set unilaterally a long-term legal target to reduce CO₂ emissions. Some young people believe the government's targets should be altered. For example, one young person said "the cut should be 80% by 2050 not 60%". Average global temperatures need to be kept below 2°C, and the Bill should set an explicit goal for the UK to play its fair part in achieving this goal.

On the basis of science available now, 80% is an absolute minimum target for the UK and this target should be on the face of the Bill. For this reason it is not good enough for the Bill to propose that the 2050 target can be revised in the light of future science. The current political opportunity for putting the right target into the Bill may not be available to future generations.

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?

Carbon budgeting

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

Young people overwhelmingly agree that the UK should move to a system of carbon management based upon statutory five-year carbon budgets set in secondary legislation. Carbon budgets represent an important method of managing the total amount of CO₂ emitted between now and 2050, which is far more important than the level of emissions in the year 2050.

However, five year budgets are an inadequate means of ensuring governments stay within a trajectory that will meet the Bill's primary goal. Any given five year budget will be the responsibility of more than one government (as the five year period will almost certainly include a General Election). The system would create incentives to delay action until late in a budget period, and will effectively grant governments a "get out of jail free" card whereby they can blame the previous government if the budget limit is breached.

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

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?

Young people in the UK agree that targets should be reviewable through secondary legislation. However, this should only be in the light of climate science, and only where this shows that targets must be changed to ensure the UK plays its fair part in keeping average global temperature rises below 2°C.

Since the rate of early action is critical in determining the UK's overall contribution to climate change, it is vital that the targets set in the Bill are from the outset in line with the latest climate science. Young people believe the government should not wait to replace the 60%-by-2050 target with a target of at least 80% by 2050, when the scientific evidence supporting this change is already overwhelming today.

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

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?

Britain's young people believe that effort purchased from other countries should not count towards UK emission reductions, with our research showing that 33.3% "Disagreed" and 37% "Strongly Disagreed" with these effort transactions.

The EU Emissions Trading Scheme (EU ETS) is only weakly capped at the moment, and is open to trading with uncapped systems through the purchase of Clean Development Mechanism and Joint Implementation credits. It is difficult to see how any of these schemes are currently compatible with the carbon budgeting approach outlined in the Bill.

As a result we think effort purchased from other countries should only count towards UK targets in a strictly limited way during the early years of the Bill's implementation. It should be left to the Committee on Climate Change to set specific limits on the allowable contribution of internationally traded effort. That limit should then be reviewed by the Committee each year in the light of future developments in international trading schemes.

We think the UK's moral authority to exercise international leadership on climate change would also be strengthened by a commitment to make the vast majority of the necessary emissions cuts within our borders.

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?

Borrowing

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

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?

Young people in the UK strongly agree that the government should have a legal duty to stay within the limits of its carbon budgets. This legal duty should be at the heart of the Bill - it will help provide businesses with greater certainty in their planning and make carbon budgets more robust.

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?

.

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?

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

.

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?

In our research we asked young people to select a number of factors that they thought were the right ones for the committee to consider. The results show that the majority of young people thought that the most important factor for the committee to consider was 'scientific knowledge about climate change', jointly followed by 'technology relevant to climate change' and 'energy policy'. Factors which also scored high were 'Economic circumstances' and 'social circumstances'.

Membership and composition

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

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?

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?

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?

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?

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?

Other responses or comments

(Please use the following space for any other responses or comments)