

Cynulliad Cenedlaethol Cymru Pwyllgor Amgylchedd a Chynaliadwyedd	National Assembly for Wales Environment and Sustainability Committee
Egwyddorion cyffredinol Bil yr Amgylchedd (Cymru)	General principals of the Environment (Wales) Bill
Ymateb gan Oxfam Cymru	Response from Oxfam Cymru
EB 25	EB 25



Oxfam Cymru response to the Environment and Sustainability Committee inquiry into the general principles of the Environment (Wales) Bill

1. Introduction

Oxfam Cymru works with others to overcome poverty and suffering. We focus our work on vital issues to tackle the root causes of poverty, from life's basics - food, water, health and education - to complex questions around aid, climate change and human rights. Oxfam Cymru welcomes the opportunity to provide written evidence to the above inquiry and hope that we can assist the committee in developing this draft legislation. We are also a member of Wales Environment Link and Stop Climate Chaos Cymru and endorse the submissions of these networks.

2. Summary of recommendations

- When planning & managing Wales' natural resources at a national and local level, the Bill needs to recognise planetary boundaries and the contribution Wales needs to make to living within global environmental limits.
- We would like a more ambitious 2050 target that takes current evidence into account, is based on global equity and fairness and acknowledges historical emissions.
- We would like the Bill to incorporate consumption based emissions.
- We would like a requirement to undertake and publish a carbon assessment of the annual fiscal budget and major strategies and infrastructure.
- The lack of environmental data available at a Welsh and local level needs to be urgently examined and addressed.
- We would like to see greater policy coherence – particularly in relation to Wales' global responsibility and how this will be reflected in the Environment Bill.

3. Planning and managing Wales' natural resources at a national and local level

3.1 Our planet is shared by over seven billion people. While a small number of people use the majority of resources, too many face extraordinary challenges in building dignified lives where they have access to essential resources such as food and water. We appreciate that this legislation is for the sustainable management of resources in relation to Wales but there has to be a recognition within the legislation that the natural resources listed in Part 1, Section 2 do not have discrete local or national boundaries. As such we need to look at natural resource use in the context of planetary boundaries. Recognition of the planetary boundaries in which Wales operates is essential for the delivery of the 'prosperous Wales' goal which recognises the limits of the global environment and the 'globally responsible Wales' goal within the Well-being of Future Generations Act.

3.2 Oxfam Cymru's recent report 'The Welsh Doughnut: A framework for environmental sustainability and social justice'¹ begins the process of identifying which environmental boundaries might be useful for incorporation into a Welsh national analysis. The picture painted by the Welsh Doughnut is stark. Wales significantly outstrips proposed boundaries in nearly all the environmental domains identified. The report shows that Wales' impact on planetary boundaries is far beyond what its population size can justify. The 'doughnut' concept could offer a useful policy development tool to

help public bodies design globally responsible policy that delivers environmentally and socially while also strengthening Wales' economic wellbeing.

4. Creating a statutory framework for action on climate change including targets for reducing emissions of greenhouse gasses

Oxfam Cymru strongly supports having a legislative framework for action on climate change including targets for reducing greenhouse gas emissions.

5. Do you agree with the proposals for the 2050 target?

5.1 A 2050 target is consistent with approaches to climate change legislation taken by other European countries such as Scotland, Finland and Denmark. A statutory long term target shows a clear commitment to deliver and will help improve planning across the public sector to take effective action.

5.2 The 'at least 80%' by 2050 target is consistent with the UK Climate Change Act 2008 but the evidence and science of climate change has progressed significantly since then. The latest IPCC report for example, warns that climate change is happening more quickly than previously thought. The Tyndall Centre for Climate Change (that has previously advised Welsh Government through the Climate Change Commission for Wales) and the Stockholm Environment Institute now call for higher targets and for developed countries to base targets on a fair global contribution.

5.3 A recent Oxfam report 'Let them Eat Coal'ⁱⁱⁱ highlights that climate change is already costing lives and making the fight to end hunger even harder. By 2050, on current trends of burning fossil fuels climate change threatens to put back the fight against hunger by several decades. There could be an extra 25 million malnourished children under the age of five by 2050 compared with a world without climate change – which is the same number of children under five in the EU. There is a price to pay for every tonne of CO₂ emitted, and it is paid in cash and in the lives and livelihoods ruined in communities far from the security and safety nets of the rich world.

5.4 The IPCC says that to meet the internationally agreed target to limit warming to below 2°C, global emissions in the electricity sector would have to reach zero before 2050. Reductions would have to be much faster in rich countries most responsible for climate change in order to be fair. There is an inherent inequality in the causes of climate change. Just seven of the richest, most powerful economies – the G7 – have been collectively responsible for half of all CO₂ emissions since the industrial revolution. It is these past emissions which have caused the climate change being experienced now.

5.5 These issues of global equity and fairness are increasingly prominent in climate discussions and international negotiations. The Environment Bill needs to reflect these concerns and as a developed country Wales should acknowledge historical emissions and base targets not only on the global carbon budget but on what is a fair Welsh contribution. Oxfam Cymru would like to see a more ambitious 2050 target that takes current evidence into account, is based on global equity and fairness and acknowledges historical emissions.

6. Do you believe that the introduction of carbon budgets is a more effective approach than the 3% annual emissions reduction target that is currently in place in Wales?

6.1 As part of Stop Climate Chaos Cymru, we have long called for carbon assessment of the annual fiscal budget and major strategies and infrastructure. This work should be carried out via the Welsh Government's integrated assessment approach to budget setting and as part of an ongoing assessment to meet the carbon budget and the requirements of the Well-being of Future

Generations Act. Such budget assessments should be made public as part of the budget scrutiny process.

7. What are your views on what emissions should be included in targets? All Welsh emissions or those within devolved competence?

7.1 Oxfam Cymru is concerned that there is no obvious mention within the draft Bill of emissions relating to Welsh consumption of goods and services. There are two methods for measuring our consumption of CO₂. Emissions can be measured on either a territorial or consumptive (footprint) basis. Territorial emissions are those relating only to the CO₂ produced within Wales. Consumptive emissions take a broader approach and include estimates of CO₂ embedded in our imports of goods and services.

7.2 We appreciate that there are difficulties in accurately estimating consumptive emissions and that results tend to be more dated than territorial data due to a more complex methodology. However, in order to deliver on the 'prosperous Wales' goal which recognises the limits of the global environment and the 'globally responsible Wales' goal within the Well-being of Future Generations Act, it is vital that consumptive emissions are taken into account.

7.3 There are currently inconsistencies across Welsh Government in the use of a consumption based approach for developing strategy, for example the Wales Waste Strategy used consumption based methodology as a basis for its development. The latest carbon footprint work commissioned by the Welsh Government (via the Climate Change Commission for Wales) remains unpublished.

7.4 Consumption emissions could be included directly in carbon budgets or included in the National Indicators. At the very least, Oxfam Cymru would like to see a consumption emissions reporting duty in the Environment Bill similar to that within the Scottish Climate Change Act as follows:

7.5 Reports on emissions attributable to Scottish consumption of goods and service

(1) The Scottish Ministers must lay before the Scottish Parliament a report in respect of each year in the period 2010–2050 containing the following information.

(2) The report must, in so far as reasonably practicable, set out the emissions of greenhouse gases (whether in Scotland or elsewhere) which are produced by or otherwise associated with the consumption and use of goods and services in Scotland during that year.

(3) The report may also contain such other information as the Scottish Ministers consider appropriate.

7.6 A duty within the Environment Bill requiring the Government to calculate and report on emissions produced anywhere in the world that result from Wales's consumption of goods and services would be a significant step forward in helping rich countries understand their responsibility for climate change. It demonstrates that justifying inaction by blaming countries such as China is untenable, as a huge portion of China's emissions result from the production of goods for developed country markets. This measure will also make it harder to 'hide' emissions overseas by closing Welsh businesses and outsourcing their work, which would make little difference to Wales's overall carbon footprint.

8. Any potential barriers to the implementation of these provisions and whether the Bill takes account of them

8.1 One significant issue encountered in the production of the Welsh Doughnut report was the lack of available environmental data at a Welsh level. This lack of data means that information on natural resources in Wales is less clear than it is elsewhere in the UK. In the case of carbon footprint results, this was due to the fact that although data exists it has yet to be published. For other data sets, for example land-use change, nitrogen cycle and ocean health insufficient Welsh data sets were available. This issue needs to be addressed by Natural Resources Wales not only to allow for evidence based policy making but also to ensure effective implementation of both the Well-being of Future Generations Act and the Environment Bill. If we do not know the current or historical state of our natural resources, how can we manage them sustainably or measure direction of travel?

9. Whether there are any unintended consequences arising from the Bill

9.1 As previously indicated, there are clear links between the Environment Bill and the Well-being of Future Generations Act. At present, insufficient clarity is provided on the relationship between the reporting requirements under each Bill. We would like to see greater policy coherence – particularly in relation to Wales’ global responsibility and how this will be reflected in the Environment Bill.

9.2 Poorly designed and implemented environmental policies can exacerbate global poverty. For example, the rapid growth in the use of bio-fuels to cut fossil-fuel use for transport in order to reduce carbon emissions has resulted in food-price crisis and land grabs. During the food price crisis of 2007-09, bio-fuel production diverted food crops for use as fuel, significantly pushing up food prices [FAO \(2011\)](#). Planting crops to produce bio-fuels has also been a major driver of large scale land acquisitions in developing countries. In many cases, bio-fuels companies have taken control of the land and water that marginalised agricultural communities, particularly women farmers, depend upon for their livelihoods [Bailey \(2008\)](#).

For more information please contact Hayley Richards:

hrichards@oxfam.org.uk

Oxfam Cymru, 5/7 St Mary Street, Cardiff CF10 1AT - Tel: 0300 200 1269

ⁱ <http://policy-practice.oxfam.org.uk/publications/the-welsh-doughnut-a-framework-for-environmental-sustainability-and-social-just-346207>

ⁱⁱ https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/bp204-let-them-eat-coal-climate-g7-060615-en.pdf