



Stop Climate Chaos Scotland

Response to Scottish Government consultation on Draft Climate Change Plan 2025

January 2026

Stop Climate Chaos Scotland (SCCS) is Scotland's climate coalition, bringing together over 70 civil society organisations campaigning together on climate change. Our membership is diverse and includes national and community organisations working on:

- Climate justice
- Environment and nature
- Gender and social justice
- Faith and belief
- International development
- Worker and human rights
- Health and inequality

Our shared goal is for Scotland and the UK to take full responsibility for the past and present climate damage we have caused, leading to action that quickly lowers our emissions and moves away from our reliance on fossil fuels in a way that is fair and beneficial to everyone. Our governments must also provide meaningful support to help the most affected communities adapt and recover from climate impacts, in Scotland and globally.

Introduction

The [new Climate Change Plan \(CCP\)](#) is one of the most important policy documents to be released by the Scottish Government (and scrutinised by the Scottish Parliament), addressing how net zero will be achieved by 2045. This objective is one of the Scottish Government's top four priorities and impacts on all sectors of the economy and society (thus affecting the other three top priorities). We therefore welcome the publication of the draft CCP and the opportunity to respond to this consultation, as well as the parallel process of Parliamentary scrutiny.

In February 2025, SCCS published [a briefing on new Climate Change Plan](#)¹, setting out our views on the process for its development/consideration as well as content and how this content should be judged. In addition, in September 2025, SCCS was pleased to [provide a response](#) to the Parliament's Net Zero, Energy and Transport Committee's ['Call for Views'](#) on the forthcoming draft plan. This response to the published draft is informed by the views set out in that briefing and earlier response.

Given the nature of our response, which is often strategic and addresses wider issues than the specific questions on the Citizen's Space portal, it is provided in written form – along with the requested Respondent Information Form. Where and when we do address the specific questions, these are set out in bold below. We hope this approach is useful and the views will be considered as the plan is finalised. SCCS, along with our individual members, would of course be pleased to discuss the matters raised in this response with Ministers and/or officials, as and when this would be appropriate and useful. In addition, of course, many SCCS members will be responding individually, often with more detailed comments where they have specific expertise; we therefore support and commend these responses.

Finally, given the timing of this consultation and likely adoption of the final plan, it cannot be forgotten that the responsibility for implementing this plan will fall to the next Scottish Government (whatever its

¹ This briefing was an update on a previous version (<https://www.stopclimatechaos.scot/wp-content/uploads/2024/03/Scotlands-new-2025-2040-Climate-Change-Plan-a-background-briefing.pdf>) to take account of the changes as a result of the 2024 Act and other developments.



political complexion following the forthcoming election in May 2026). Thus, one overarching ask in [SCCS' policy proposals for the 2026 elections](#) is to:

“Uphold and take action to meet the legal target to reach net-zero by 2045 at the latest by delivering, and where necessary strengthening, the new Climate Change Plan. This includes ensuring policies are adequately resourced, implemented fairly, and are credible.”

Accordingly, while not strictly a matter for the current Scottish Government, SCCS considers it is important, as part of the Parliamentary scrutiny process and wider public debate, that all spokespeople, political parties and those aspiring to form (or be part of) the next Scottish Government commit to deliver (and, if necessary, improve) the final CCP.

Overview

The draft clearly purports to deliver the carbon budgets as recommended by CCC and approved by Parliament in recent regulations. In addition, the projected emissions reductions (or removals) are set out on a sectoral and policy package level – and, arithmetically, these reductions/removals deliver the overall carbon budgets.

In addition, in our view, the draft sets out the costs/benefits well, with sectoral/overall data for costs and predicted GVA increases. In particular, we note the considerable economic benefits to be realised by acting on climate change and the considerable costs of inaction. Likewise, there are considerable and positive sections on just transition issues, such as likely job benefits, protection for those with low incomes, health benefits, etc.

If the draft plan was to be judged, therefore, on the narrow basis of “does it meet the requirements” of section 35 of the Climate Change (Scotland) Act 2009, as amended, the result would be “possibly” given that all the required elements are present. However, while present, these elements all contain elements of uncertainty, further delays and lack of ambition (some of which are considerable). While existing measures have secured reductions of emissions to date (c.f. 1990 baseline), these were the “low-hanging fruit” and also proved insufficient to prevent missed targets in 9 of the 13 years prior to the switch from legal annual emission reduction targets to carbon budgets.

The elements of uncertainty, further delays and lack of ambition exist across a range of sectors and include failing to follow CCC advice on agriculture, further delays in the decarbonisation of heat in buildings, silence on the issue of offshore oil and gas, and little or no action on aviation or shipping. All of these matters result in emissions remaining higher than proposed by the CCC – which is then addressed by over-ambition in the deployment of Negative Emissions Technologies (NETs). Alongside this, some of the most egregious examples of climate injustice - such as those who choose to travel by private jets - are inadequately addressed, raising serious questions about the Scottish Government’s commitment to the polluter pays principle.

If these policies work as predicted and, in particular, if the NETs materialise and deliver removals to the extent predicted, the carbon budgets will be met. However, as detailed in our response, this does appear to be significantly uncertain and the plan needs considerable improvement before it is finalised and adopted in order to build in greater resilience and to bolster confidence that the emission reductions envisaged will be achieved in practice.

The absence of any significant new measures, the selection (in some sectors) of a lower emissions reduction pathway than the CCC recommended, further delays in some sectors and the over-reliance on NETs, taken together, give rise to a significant concern as to whether the plan is, in fact, a credible means of “meeting the emissions reduction targets during the plan period” (s.35(2)(a) of the 2009 Act, as amended). This will, in the absence of real transparency related to how projected emissions reductions for each policy package are calculated, remain a matter for judgement. Given the necessity of delivering emission reductions at speed, greater confidence is needed.



In the sections to follow, we provide a general response to relevant sections of the draft CCP. Each section begins with a copy of the questions posed in the consultation, but is followed by our general observations and recommendations, along with – where appropriate, any answers to the specific questions. In the ‘Sectoral contributions’ section, we respond both to the matters set out in that section of the draft CCP, but also to the more detailed policies and proposals in annex 2.

Section 1: Delivering a Just Transition

The following questions concern the Delivering a Just Transition section of the Plan, more specifically: communities, skills, workforce, employers and adapting to climate change.

- 1. What are your views on our approach to delivering a just transition for people and communities?**
- 2. We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?**
- 3. The Plan will bring opportunities and challenges for businesses and employers. How can we best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?**
- 4. Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland. What are your views on our approach to supporting places where the transition presents particular regional impacts?**

As set out in the introduction to SCCS above, we champion the need for a just transition. In particular, action on climate change must be carried out “in a way that is fair” and “help[s] the most affected communities”. SCCS, therefore, fully supports the just transition principles as set out in s.35C of the 2009 Act, as amended, and the requirement (s.35(22)) to have regard to these principles in preparing the CCP.

It is therefore welcome that the draft plan sets out, in an early chapter, the “Economic Opportunities of a Just Transition to Net Zero” – alongside a subsequent chapter (and annex 1A) on “Securing a Just Transition”. We further note that these benefits are, in fact, enhanced when considered alongside the alternative of not acting – these costs of inaction, including recent OBR estimates, are referenced in a later chapter on “The Benefits and Costs of Climate Action” – but also strengthen the case for acting to secure a just transition and should, therefore, be cross-referenced in the just transition sections. In addition, the human cost of inaction - now, and in the future, should be further emphasised.

However, while the draft plan does recognise and discuss the just transition principles at length, it is sometimes hard to identify clear actions to ensure that the transition is just. Indeed, as reflected in the sectoral comments below, SCCS is often concerned at the lack of strength of the actions outlined to secure any transition. The Plan, rightly, notes that “Delivering the climate mitigation policies and across these sectors will require action from everyone across Scotland”, but could more clearly acknowledge evidence that, on average, the richer you are, the more you pollute. Flowing from this, while the Plan outlines the scale of investment needed, there is insufficient focus on ensuring the public revenues needed are raised in ways that directly reflect deep carbon inequalities.

While, positively, the Plan commits to “actively seizing the opportunities of the transition in a way that is fair”, it should also be explicitly stated that the consequences of a failure to act effectively to reduce emissions at speed will be experienced most acutely by those on low-incomes who have less financial resilience with which to insulate and protect themselves from climate impacts

Notwithstanding the above, however, we welcome moves that have been made, to date, such as the establishment of the Just Transition Commission, and consultations on draft Just Transition Plans for transport and agriculture/land use and Grangemouth and Mossmorran. However, as set out in [our response to the draft Just Transition Plans for transport](#), there is a need for these plans to be considerably improved - moving from high-level strategies to clear implementation plans. The



long-term status and remit of the Just Transition Commission also need to be clarified and, ideally, strengthened. In particular, the Scottish Government should, in the finalised CCP or elsewhere, commit to:

- Establishing the Just Transition Commission as a permanent, statutory body with a remit to provide advice to the government and a duty on Scottish Ministers to have due regard to its advice. Strong institutional and scrutiny mechanisms are essential to increase confidence that the CCP will be delivered in practice.
- Publishing finalised and strengthened Just Transition Plans for transport, agriculture/land use, buildings and other sectors.
- Urgently creating strengthened, action-focused and fully funded Just Transition Plans for Grangemouth and Mossmorran – but also for [the wider oil and gas sector](#) (see also our comments on energy supply, below).

Notwithstanding the focus on reducing Scotland's territorial emissions, it is positive to see the importance placed on ensuring Scotland, "as a global climate leader, does what it can to limit the emissions impact of the choices made in Scotland, both at home and abroad". It would be entirely incoherent to reduce emissions generated in Scotland by exporting these internationally. Further, the impact and credibility of Scotland's international efforts will be fundamentally undermined without simultaneous action to reduce territorial emissions and those generated through the goods and services we consume in Scotland, but which are produced or provided internationally.

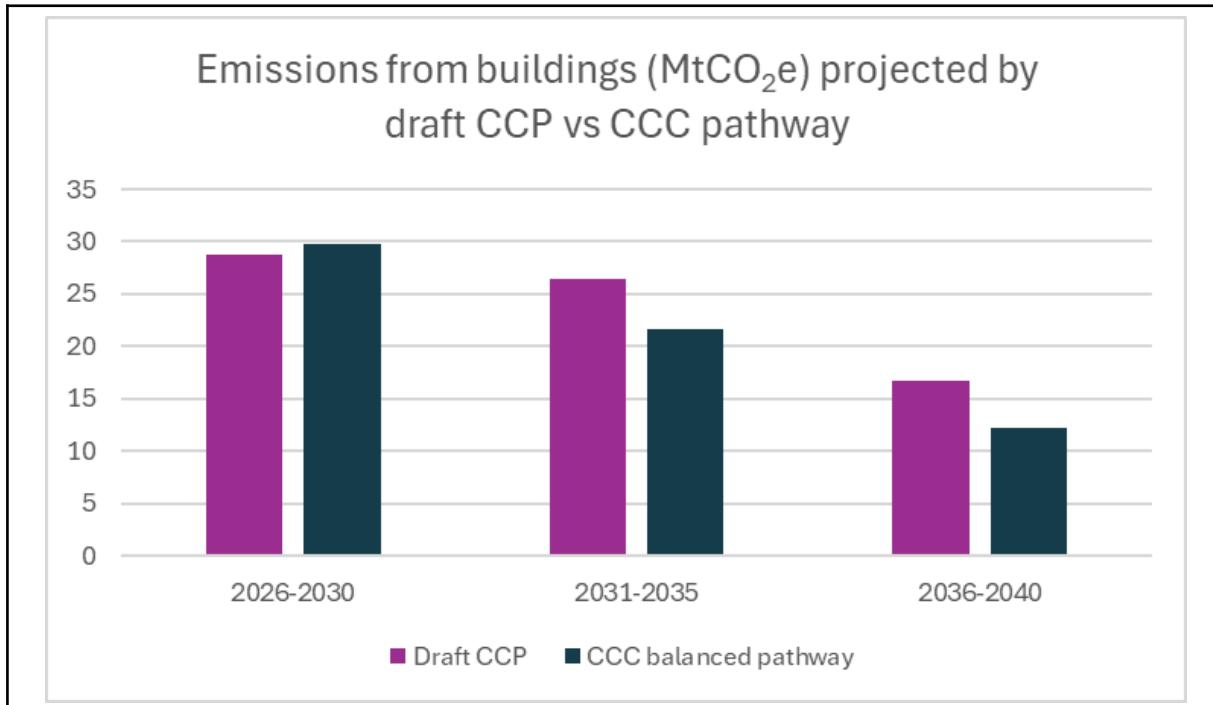
Section 2: Sectoral Contributions and Policies and Proposals

Buildings (Residential and Public)

5. *How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?*
6. *How can clean heating systems (such as heat pumps) be made more affordable for everyone?*

Overall, SCCS is disappointed with the buildings-related sections of the draft CCP. It does not appear to introduce any new measures to accelerate the rollout of clean heating systems or energy efficiency beyond the various current schemes listed (e.g. on p9-11 of annex 2) which are, implicitly, suggested will continue (although even that is not stated explicitly). In addition, it is assumed, although again this is not stated, that the [revised](#) and [delayed](#) Heat in Buildings (Scotland) Bill will, in the course of the next Parliament be brought forward.

As a result, under current plans, only around 20% of homes are expected to have clean heating by 2035, half of the CCC's pathway of 40%, leaving Scotland significantly off track without additional policies. The UK CCC pathway requires early and sustained emissions reductions, reaching 21.7MtCO₂e by 2035, supported by rapid heat pump deployment (35,000/year by 2030 and 120,000/year by 2035), spreading demand and costs over time. In contrast, the draft CCP pathway delays significant emissions cuts until after 2040, creating a cliff-edge scenario that risks supply chain bottlenecks, cost inflation, and inequities for households if action is compressed into the final carbon budget. This is illustrated in the figure below:



For a fair and just transition, and one that (in the words of question 5) “decarbonises homes and buildings in a way that is fair and leaves no one behind”, Scotland must front-load clean heat deployment, strengthen financial support, and invest in workforce development to align more closely with the CCC trajectory and avoid last-minute pressures and a two-tier transition. This requires a mix of regulatory and incentive/support measures – thus, there is a need for the final CCP to set out actions, especially, in the early years to encourage early action that results in emissions reductions closer to the CCC’s pathway.

Notwithstanding the above, we welcome the proposal to publish a Heat in Buildings Strategy and Delivery Plan by the end of 2026. This is proposed to set out “a clear and credible pathway for heat decarbonisation” and is therefore welcome – albeit that, in fact, this section of the CCP, based on the CCC advice, would (had the policies above been set out) have provided such a credible pathway. This effective postponement of policies and proposals (to another plan in a year’s time) appears to underline the delay inherent in this section of the draft CCP. Instead of delaying this essential transition, the Scottish Government should establish fair funding support mechanisms which enable households to switch to clean heat systems and improve energy efficiency, ensuring full support for low-income households as a demonstration of its commitment to a just transition in buildings.

SCCS recommendations:

- The finalised CCP should commit the Scottish Government (subject to electoral and Parliamentary processes) to bring forward a Heat in Buildings legislation² early in the next Parliament. This should introduce a strong regulatory ‘baseline’ for decarbonised heating systems and high standards of energy efficiency, especially for private rented properties – to complement the various incentive schemes that should, in part, ensure that low and average income households are not disadvantaged by the transition.
- The finalised CCP should explicitly set out how the various incentive schemes listed will be continued and enhanced (with increased budgets) – notably within the early years of the CCP, so as to encourage early action that results in emissions reductions closer to the CCC’s pathway.

² Such legislation is currently in the form of a [Draft Buildings \(Heating and Energy Performance\) and Heat Networks \(Scotland\) Bill](#).



Transport

7. **Which of the following would be most effective in enabling you to transition your vehicle(s) to zero emissions alternatives? Please rank your choices from highest to lowest priority, where 1 is the highest priority. Please only give one ranking to each option:**
 - **If you're responding for an organisation: you may want to consider car fleets as well as HGV fleets.**
 1. **Cost of new zero emission vehicles needs to come down**
 2. **Cost of used zero emission vehicles needs to come down**
 3. **Reliable infrastructure for vehicles (such as fuel or charging networks)**
 4. **Noticeably cheaper running costs (electricity, maintenance, insurance)**
 5. **Convenient access to public charging infrastructure**
 6. **Ensuring an adequate number of trained mechanics are available to perform essential maintenance and repairs**
 7. **Access to funding support / low-cost finance**
 8. **All of the above**
 9. **Other**
8. **How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?**
9. **What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?**

SCCS welcomes the range of positive policies and proposals for the electrification of cars, vans and HGVs. Accordingly, we welcome the concrete progress that has been made through ScotZEB1, 2 and (upcoming) 3 on buses and the various rounds of the Plugged-In Communities Grant Fund on minibuses and community transport. If these investments are continued and scaled-up during the lifetime of the CCP, further good progress to decarbonising/electrifying the bus and community transport sectors.

It appears that these policies will deliver the majority of the emissions reductions in this sector. In response to the specific question 7, we will not choose one individual answer – but rather option 8 (all of the above) – as these are all measures that might accelerate electrification. While a number of the measures require action by (or in partnership with) the UK Government, many are the responsibility of the Scottish Government and/or Local Authorities.

Notwithstanding the above, the draft plan is, however, weak on modal shift and increasing public transport/active travel. As a result, few emissions reductions are projected from actions in these areas. Yet, if travel is to transition to a genuinely sustainable model, in the long term, both to fully decarbonise and to prevent demand for electricity rising beyond that which can be met from renewables, it is important that there is real and significant modal shift (from cars to public transport/active travel; from planes to trains; and, for freight, from road to rail - as well as greater use of non-travel options, such as online working). Such a modal shift is important as simply electrifying all vehicles will not address issues such as congestion unless numbers or use levels are reduced; it also has the benefit of not increasing electricity demand as much as otherwise (freeing renewables capacity for other uses); delivers greater fairness and health benefits; and aids international climate justice by lowering demand for critical minerals.

To drive this modal shift, policies must be implemented that deliver disincentives (to the highest polluting flight and road use, primarily where alternatives exist); this will mean measures such as a frequent flyer levy and/or private jet tax, as well as road pricing, parking charges, congestion charges, and bus/cycle prioritisation). In parallel and concurrently, these disincentives should be matched by incentives such as more reliable and cheaper public transport, more and safer cycle lanes and infrastructure for walking/wheeling. The Scottish Government has already made progress in some of these areas (e.g. ending peak fares on ScotRail, bus concession schemes) but there is much more



that is possible – and should be added. Measures that should be considered include increasing investment in walking/cycling/wheeling schemes and projects to reach at least 10% of the total transport budget, reinstating an ambitious car-miles reduction target, measures to achieve such a target, widening eligibility for bus fare concessions and reducing rail fares further.

The above measures are actions that the Scottish Government could take to support our members and supporters (and others) “live a more climate friendly lifestyle” and, thus, in relation to transport, serve as our answer to question 9.

Finally, it remains welcome that the Scottish Government includes aviation and shipping within its emissions accounting and its emissions reduction targets. However, while recognising that many of the measures necessary to reduce these emissions are matters for the UK Government, there is much that the Scottish Government could do to contribute – but there are no substantive proposals in the draft plan.

In relation to aviation, the CCP is particularly weak - with a clear over reliance on Sustainable Aviation Fuels. The Scottish Government should use planning policy to ensure that airport expansion and re-development is limited to those developments that improve service and not permit those designed to accommodate additional flights. Secondly, the Scottish Government should commit to introduce Air Departure Tax (ADT) as soon as possible, and certainly no later than the first half of the next Scottish Parliament, with appropriate exemptions for lifeline island flights (except for passengers using private jets). From the outset, there should be a significantly higher rate that operates as a private jet tax, directly targeting this high-polluting, and wholly unnecessary behaviour. This measure is a necessity in light of the Government’s stated support for the ‘polluter pays’ principle, and would demonstrate a clear commitment to pursuing climate action fairly. Critically, as well as incentivising emission reduction, the measure has the potential to raise important new revenues to reinvest in fair climate action, such as expanded concessionary bus travel.

A private jet tax is a fair first step enroute to a medium term commitment to evolve this tax into a frequent flyer levy, asking those why fly more, to pay more – perhaps above a certain number of flight threshold. While aspects of this have, formally, been [Scottish Government policy](#) for some time, the finalised plan should set out a clearer timetable for actual implementation. This would start to reflect the call from the CCC for a demand management strategy within aviation, and the clear calls for a frequent flyer levy from Scotland’s Climate Assembly.

These ADT measures should be accompanied by additional investment in improving and reducing the cost of train services that offer an alternative to short/medium distance flights.

Of course, additionally to the above measures, we support efforts to develop electric or alternatively-fuelled flights to serve the Scottish islands and/or for essential long-haul flights for which there are no alternatives (although note that this should be limited to ‘essential’ – a number that could and should be reduced by use of non-travel options for e.g. business).

Finally, it is worth noting that in Annex 2, the Scottish Government calls on the UK Government to provide “greater clarity and ambition on aviation and shipping decarbonisation policies”. While SCCS agrees with this, to be credible, the Scottish Government must show far greater ambition in the use of devolved powers to reduce emissions from aviation.

SCCS recommendations:

- The finalised CCP should set out policies to generate a real and significant modal shift (from cars to public transport/active travel; from planes to trains; and, for freight, from road to rail).
- These must include disincentives such as road pricing, parking charges, congestion charges, and bus/cycle prioritisation, alongside incentives such as increasing investment in walking/cycling/wheeling infrastructure, reinstating an ambitious car-miles reduction target, and measure to achieve such a target, and widening eligibility for bus fare concessions and reducing rail fares further.



- The finalised CCP should commit the Scottish Government to introduce ADT as soon as possible, with appropriate exemptions for lifeline island flights (except for private jets), but with a top rate that operates as a meaningful private jet tax; alongside a medium term commitment to evolve this tax into a frequent flyer levy.

Waste

10. Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas:

- Strengthen the circular economy***
- Reduce and reuse***
- Modernise recycling***
- Decarbonise disposal***
- Other emission sources (including waste water and anaerobic digestion)***

SCCS welcomes the draft CCP's assertion that "the Scottish Government is committed to building a circular economy, moving from a "take, make and dispose" model to one where we value our materials and keep them in use for as long as possible". We agree that "this shift is essential to power Scotland's just transition to a fair, green and sustainable economy, and critical to meeting our obligations to tackle the twin climate and nature emergencies".

However, while we recognise that there has been some progress, in some areas, as noted in the draft CCP, we also note that many actions have also seen unnecessary delays and/or weakening of measures (e.g. deposit return scheme, [landfill ban](#)). Moreover, the draft CCP contains no new actions or policies – all of which are reliant on the [Waste Routemap to 2030](#) and forthcoming Circular Economy Strategy currently subject to [consultation](#), with targets being set by 2027.

In relation to the delayed landfill ban, referenced above, this was announced around the same time as the draft CCP was published and is not mentioned in the draft CCP. It is not clear, therefore, whether the emissions that will result from this delay are included in the projected emissions budget for this sector. The finalised CCP should, therefore, make clear if and how the consequences of this delay have been taken into account, and included in the projected emissions.

Without significant improvements to this strategy (along with ambitious targets and appropriate indicators) achieving the emissions reductions projected in the draft CCP seems unlikely. Moreover, unless this strategy and routemap drive significant changes in consumption, Scotland's wider carbon footprint (as set out in annex 1 of the draft CCP in accordance with s.35(18) of the 2009 Act, as amended) is unlikely to be further reduced. As, in effect, the draft CCP's effectiveness in relation to this sector is entirely dependent on the effectiveness (or otherwise) of the Circular Economy Strategy, our recommendations on this section are in line with eNGO comments on that strategy.

Thus, the finalised CCP (and the forthcoming Circular Economy Strategy) must have a vision and outcomes where material consumption and associated social and environmental impacts are reduced. This will, in part, include less emphasis on a growth based narrative for the economy, with social and environmental impacts recognised and addressed. It will need more emphasis on the need for everyone to have access to reuse and repair services. It will also need greater corporate responsibility with guidance on human rights and environmental due diligence to be introduced in Scotland by 2030 based on the UN guiding principles on Business and Human Rights. This will also help address and link to the wider consumption and international issues discussed elsewhere in this response.

SCCS recommendations:

The finalised CCP will need to indicate that the final version of the circular economy strategy will include or, depending on timing, has included:

- A vision and outcomes where material consumption and associated social and environmental impacts are reduced.



- A solution grounded in system change, rather than behaviour change. It is unfair and ineffective to ask people to change when the system itself is broken. Investment in reuse should be a priority policy mechanism.
- New priority areas are needed for plastic, chemicals and electrical products. These materials demand special consideration in the strategy because of the scale of harm associated with their use.
- Replacing product stewardship plans with an ambitious extended producer responsibility programme as there is evidence that EPR is more effective at incentivising producers to reduce waste and redesign products.
- Indicators for raw material consumption and carbon footprint for Scotland. The production, use and disposal of plastic must also be measured.
- A plan for how Scotland can reduce its overall demand for critical minerals, and recycling of minerals.
- A plan to utilise Global South experts, in order to inform the policy development and delivery of a circular economy in Scotland that understands the global impact of Scottish consumption and ensures that the new economy is not built on the back of peoples elsewhere.

Energy Supply

11. What are your views on Scotland generating more electricity from renewable sources?

In response to this single question on energy supply, SCCS strongly supports the increased production of electricity from renewable sources. This is important both to replace residual fossil fuel use (e.g. gas at Peterhead) and, in due course, aging nuclear stations, but also to provide for rising demand as heating, transport and industry are increasingly electrified.

Notwithstanding the above, our support has two caveats. First, renewable developments (both the generation equipment and the distribution infrastructure) need to be well-sited and managed so as not to exacerbate the nature crisis. Second, to ensure long-term sustainability, the rising demand from electrification should equally be managed by improved energy efficiency in heating and industry and by modal shifts in transport. Our comments on those issues, under those sectors, should therefore be considered as part of our support for renewable energy.

SCCS would also add other important comments or responses to the draft plan's section on energy supply.

First, we strongly support and welcome the continued policies of not supporting new onshore oil and gas (including fracking) as well as coal extraction. These should be confirmed in the finalised plan.

Second, however, we are concerned that the draft plan is, effectively, silent on offshore (North Sea) oil and gas, beyond noting historic declines which are expected to continue. While formal responsibility for offshore licensing rests with the UK Government, many associated onshore matters (as well as offshore environmental regulation) are a matter for the Scottish Government. Moreover, this draft plan in many areas, rightly, calls for specific action by the UK Government in other reserved areas – and, elsewhere, the Scottish Government often expresses its views on reserved matters (e.g. nuclear weapons, social security, foreign affairs). Thus, in SCCS's view, there is a strong case for the final CCP to include more leadership by the Scottish Government and call for the UK Government to exercise its reserved powers in relation to offshore oil and gas so as to deliver [a managed wind-down in North Sea production in line with a Just Transition](#).

In light of [the UK Government's recent decision](#) to rule out new oil and gas fields (albeit with potential loopholes related to "tiebacks"), [welcomed by SCCS](#), the Scottish Government should take a far more progressive position, as suggested above, in the finalised CCP.

Third, we note the draft plan's observations in relation to the existing Peterhead gas-powered power station and the current application for a "CCS-enabled" replacement. While the plan rightly makes no



comment on the merits or otherwise of the current application, its projections of high levels of removals by NETs (see industry section below) and comments pressing the UK Government to confirm funding for Acorn and other CCS schemes, suggests that the Scottish Government's overall energy supply pathway may include such a CCS-enabled plant. Yet, the CCC is clear that "there are no low-carbon dispatchable power stations that require the use of gas with CCS in [their] pathway".

Fourth, we note the inclusion of energy generated from the incineration of waste. While there may be a place for some such energy generation, it should be considered as limited, both in extent and duration (as a tool to enable transition and not permanent). This is because such energy is not renewable - it should be seen as a leakage from the circular economy and, along with landfill, perpetuating a linear based economy. It is, therefore, inconsistent with the aspirations set out in the waste chapter (see below) and the circular economy strategy.

In support of the above concern, we would observe that emissions from incineration have risen 6865% from 1990 to 2023 (with the greatest change occurring since 2018). This will continue to rise as more incinerators are allowed to be built in Scotland. Thus, including waste in the UK ETS is not enough, on its own, to solve this problem. The best way to reduce emissions from incineration is not to build incinerators in the first place and find other ways of reducing and managing waste, consistent with the circular economy aspirations (see below). This approach is supported by the [independent review on incineration \(2022\)](#) which concluded "given the risks that incineration poses to human health and the environment, and the risk of lock-in, Scotland should not construct more capacity than it needs and only some of the currently planned capacity should be built".

Finally, one issue that the draft CCP fails to address is potential impact, not least on energy demand/supply, of the current upsurge in interest in the data centres to provide primarily for AI. Applications for such centres, currently in the planning system, would more than double Scotland's energy demands. This has huge consequences for the energy sector - this demand, alongside rising demand from the electrification of other sectors, could not be met by renewables alone and would, in practice, lead to new calls for nuclear or fossil fuel generation.

While there is clearly a role for AI and data centres to support research and new working practices, this legitimate demand is tiny in comparison to the proposals currently being considered. Yet, neither NPF4 or the Scottish Government's [Green datacentres and digital connectivity: vision and action plan for Scotland](#) recognise the need for a strategic approach - to limit the total number of data centres, and to ensure that they are of the right type and in the right place (e.g. on brown field sites with existing infrastructure). The finalised CCP should, therefore, recognise the energy and climate consequences of an unconstrained growth of data centres and commit the Scottish Government to reviewing and revising both NPF4 and its action plan for data centres to introduce a more strategic and climate-friendly planning system.

SCCS recommendations:

- The finalised CCP should demonstrate some leadership by the Scottish Government and call for the UK Government to exercise its reserved powers in relation to offshore oil and gas so as to deliver [a managed wind-down in North Sea production in line with a Just Transition](#).
- The finalised CCP should make clear that gas-powered electricity generation (whether CCS-enabled or otherwise) is unnecessary and will not be supported. Investment should be focused on renewables and associated energy efficiency measures.
- The finalised CCP should recognise the energy and climate consequences of an unconstrained growth of data centres and commit the Scottish Government to reviewing and revising both NPF4 and its action plan for data centres to introduce a more strategic and climate-friendly planning system.



Business and Industrial Processes (including general comments on CCUS and NETs)

12. What support do industries need to reduce their carbon emissions while remaining competitive?

SCCS generally supports the ‘vision’ set out in this chapter of the draft CCP that “Scotland’s industrial sites” will benefit “from decarbonisation pathways like electrification, fuel switching (hydrogen and bioenergy), energy efficiency, carbon capture utilisation and storage (CCUS), and a supportive public and private investment framework” and that, as a result, “by 2040, the industrial sector in Scotland will be significantly decarbonised”.

SCCS welcomes and fully supports the measures related to electrification and energy efficiency. These should be prioritised and supported by public policy and, where appropriate, grant aid. Fuel switching, in the form of hydrogen and bioenergy, will also have a role to play in the decarbonisation of industry – but must also be subject to selective and targeted deployment. Fuel substitution by hydrogen must not be applied to general heating systems, and for other uses must be limited to genuinely ‘green’ hydrogen, produced using renewable energy (and only where direct electrification is not possible).

To support and encourage this transition, we support continued participation in the UK ETS and the continuation/development of the Scottish Industrial Energy Transformation Fund. However, it should be noted that our support for the participation in the UK ETS is, as set out in [our response to the consultation on its extension to the maritime sector](#), subject to concerns that have been expressed over the operation of the EU (and UK) ETS schemes (see, for example, [here](#) and [here](#)). These relate to a mix of in-principle concern about the reliance on market mechanisms (as opposed to regulation or direct taxation/subsidy) and issues with the effectiveness and efficacy of the schemes as implemented (some of the latter concerns demonstrating the inherent issue of a market-based approach). Notwithstanding this, however, both the EU and UK ETS schemes exist and, while they do, every effort should be made to ensure they are as effective as possible – including delivering emissions reductions.

Our most significant concern, in relation to this section, is the over-reliance on, and non-targeted application of, CCUS and other NETs. This is, in part, necessary due to the lack of stronger actions to reduce emissions from agriculture, buildings and other sectors, or the delays to such actions (see comments above and below).

The draft plan appears to suggest that NETs will remove a massive 12.2MtCO₂e in the third carbon budget period (2036-2040) – and increase from 0.2 MtCO₂e and 3.0 MtCO₂e in the first and second budgets, respectively (annex 3, page 66). This third carbon budget suggests an average of 2.44MtCO₂e per year from 2036-2040 – which contrasts with the CCC’s balanced pathway to 2045 which suggests that “engineered removals” would only reach 2.0 MtCO₂e by 2040. In addition, the CCC considers that “by 2035, most abatement from CCS is in the chemicals sector, though by 2038 it is equally important for the cement industry”. The CCC also applies to CCUS to EfW plants but there is no use of CCS for gas powered power stations in the CCC pathway (see comments above in relation to proposals for Peterhead).

The Scottish Government is therefore being significantly more ‘optimistic’ about the earlier and more successful deployment of these technologies than the CCC. Yet, the plan also rightly acknowledges that “the exact mix of deployment for these developing technologies in Scotland is currently unknown” and “this analysis is subject to a significant degree of uncertainty.”

SCCS therefore warns against reliance on these to deliver emission reductions at scale during the plan period. These technologies rely, to a great extent, on potentially expensive (both costly and inefficient), unreliable and unproven technologies³. To date, most of these technologies remain

³ The Intergovernmental Panel on Climate Change (IPCC) ranked CCUS as among the least effective and most expensive ways to meet 2030 climate targets; see:



‘theoretical’ and there are few, if any, examples of their successful deployment - at all, never mind at the scale apparently envisaged by the draft plan⁴. In addition, even at currently estimated costs (which will only rise in practice), they are extremely costly (in actual costs and opportunity costs) and therefore of low cost-effectiveness. [Recent analysis](#) confirms that such projects “come at a high cost and risk overreliance on technologies that are currently unproven”. In addition, it is notable that the UK Government “[has sharply downgraded near-term expectations for engineered carbon removals, ... highlighting the need to focus on delivering proven climate solutions like renewables and electrification](#)”.

In these circumstances, resources and effort would be better spent on reducing or removing the need for CCUS/NETs, such as: -

- developing alternative processes that do not produce GHGs, such as more renewables, electrification and energy efficiency;
- delivering stronger actions, or avoiding delays, to reduce emissions from agriculture, buildings and other sectors; and/or
- measures that the CCC describe as “contingency actions and options to go further”⁵.

Given the uncertainties in relation to funding, reliability and credibility, where other options (especially electrification and/or improved efficiencies) exist, these alternatives should have primacy, with use of CCUS restricted to a few, limited cases where decarbonisation by other methods may not be possible. This would focus resources (financial and other) for CCUS on where it is necessary, increasing the chances of success, while preventing it being a distraction or reason to delay decarbonisation in other sectors.

Accordingly, any inclusion of carbon removals should be limited, transparently justified and backed by a credible, science-based delivery plan – they must not be used as a substitute for rapid and fair emissions cuts. In addition, the uncertainties related to CCUS and NETs mean the CCP should, at least, include a ‘Plan B’ as to how emissions reductions will be achieved in the event that these technologies do not deliver. Such a proposal [was recommended by the then ECCLR Committee](#), in the previous session of Parliament, in relation to the current CCP/CCP_u.

Such a ‘Plan B’ would need to acknowledge not only the uncertainties described above but also the reason for the Scottish Government’s ‘over-optimistic’ approach. These high projections for removals by NETs, especially in the third carbon budget, are included (it must be assumed) to ensure the plan adds up – given the delays and reduced efforts (compared to the CCC pathway) in other sectors, such as agriculture and buildings. Thus, a Plan B should involve a more realistic approach to NETs (and lower removals) alongside faster and/or increased emissions reductions in agriculture, buildings and transport (as proposed by the CCC and/or as identified in this response).

SCCS recommendations:

- The finalised CCP should make clear that, where other options (especially electrification and/or improved efficiencies) exist, these should have primacy, with use of CCUS restricted to a few, limited cases where decarbonisation by other methods may not be possible.
- The finalised CCP should include a ‘Plan B’ as to how emissions reductions will be achieved if CCUS/NETs do not deliver.

Agriculture and Land Use, Land Use Change and Forestry (LULUCF)

13. How can the Scottish Government encourage sustainable land use, that is also productive for local communities?

https://www.ciel.org/wp-content/uploads/2022/04/IPCC-Unsummarized_Unmasking-Clear-Warnings-on-Overshoot-Techno-fixes-and-the-Urgency-of-Climate-Justice.pdf

⁴ Research by the Institute for Energy Economics & Financial Analysis (IEEFA) shows that no CCUS project in the world has managed a capture rate of more than 80 percent, with many capturing much less; see: <https://ieefa.org/ccs>.

⁵ We note that [the CCC's advice](#) includes a section headed “Contingency actions and options to go further”. However, this was not referenced or responded to in the Scottish Government’s indicative statement or draft CCP. In SCCS’ view, these additional actions referenced by the CCC provide an opportunity for less reliance on NETs (and/or for a so-called “Plan B”).



14. **What do you think about our proposals for planting trees and restoring natural habitats like peatlands?**
15. **How can the Scottish Government support farming to become more climate-friendly while continuing to support food production and improve biodiversity?**

(a) Agriculture

In relation to agriculture, the proposals set out in the draft CCP differ from those in the CCC pathway in two major respects; these are, that the draft CCP:-

- does not adopt or propose any policies in relation to diet or the wider food system; and
- does not adopt or propose any (proactive) policy to reduce livestock numbers.

These two differences are linked, of course, as the dietary changes that the CCC would envisage relate to a reduction in meat/dairy consumption, with an associated impact on the livestock sector and herd size. This approach was foreshadowed in [the Scottish Government's indicative statement](#), which stated:

"The Climate Change Plan will not follow all the policies for agriculture set out in the CCC's balanced pathway and will prioritise meeting our climate and nature obligations in a way which works for Scotland. The Scottish Government is absolutely clear we will reach net zero in a way which works for rural Scotland and plays to our strengths. That means we will continue to support our livestock sector to reduce emissions. There is no policy to reduce livestock numbers. This Government will not bring forward policy to reduce livestock numbers. Net zero policy will continue to be designed with rural communities – not something which is done to them."

It was underlined by the Cabinet Secretary for Rural Affairs, Mairi Gougeon MSP, at the Royal Highland Show 2025, who said:-

"While we have accepted the CCC's proposed carbon budget levels to reach net zero, we will not be accepting their policy recommendations which would have had a detrimental impact on our agriculture sector and wider rural economy.

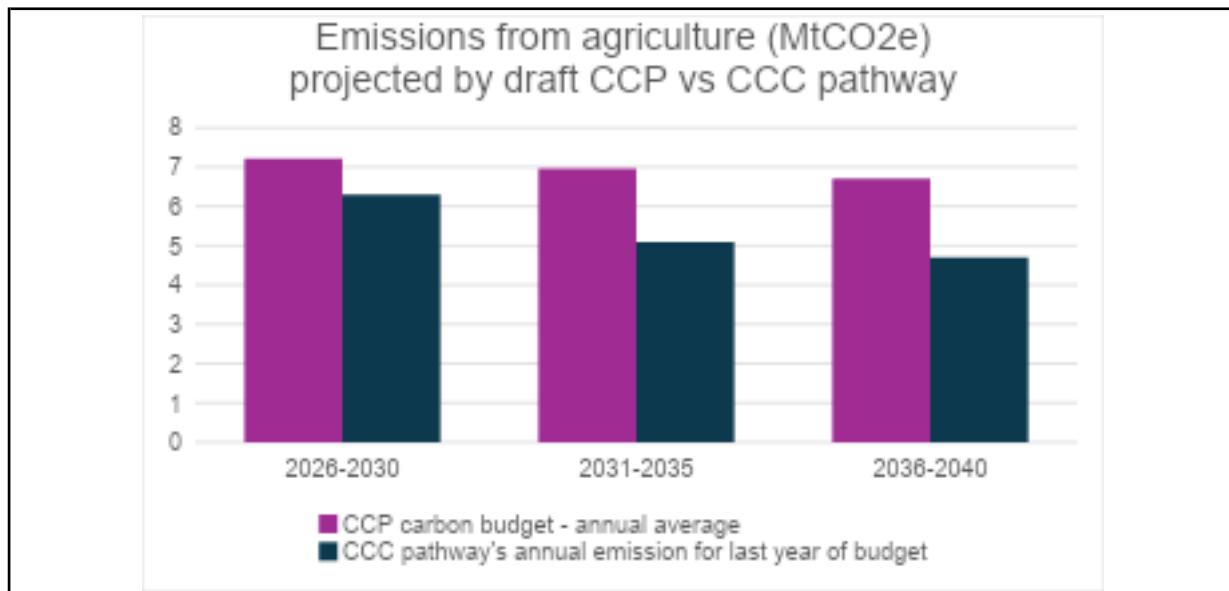
Let me be crystal clear: this government has no policy, and will have no policy, to cut livestock numbers.

We will reach net zero, and we intend to do that in a way which works for rural Scotland."

By contrast, Section 3.2.2 of [the CCC advice on carbon budgets](#) is clear that the balanced pathway includes:

"Reducing livestock numbers (48% of emissions reductions in 2035). Cattle and sheep numbers fall by 26% by 2035 compared to 2023 (Figure 3.5b). This is due to changes in agricultural policy that enable livestock farmers to diversify income streams, a shift in UK-wide consumption towards lower-carbon foods (Figure 3.5c), and improvements in productivity from livestock measures (for example improving livestock health and robotic milking parlours) that reduce methane and nitrous oxide".

Of course, while the Scottish Government is entitled to make these choices, the consequence is that the emissions from the agriculture sector will be higher than proposed in the CCC pathway. This is illustrated in the diagram below.



These policy choices do, however, involve a number of inconsistencies, false assumptions and missed opportunities. These include: -

- The draft CCP's silence on diet and food system appears to be inconsistent with current policies for public health - currently, [NHS advice](#) is that "if you ... eat more than 90g (cooked weight) of red or processed meat a day, it is recommended that you cut down to 70g"; yet, "[32% of adult meat consumers in Scotland exceed](#)" this recommended level. The 70g per person per day target is also reflected in the Scottish Government's "[Dietary goals for Scotland](#)". As/when this public health advice is followed (in Scotland, across the UK and elsewhere) the changes in consumption/diets will undoubtedly impact livestock numbers and/or types. Similarly, the draft CCP should recognise and address the benefits of localised food production and supply (both in terms of 'food miles' and local economies) over the current system largely driven by supermarket chains. The evidence of links between diet, health and respecting planetary boundaries has been collated and published by [the EAT-Lancet Commission on healthy, sustainable, and just food systems](#).
- In relation to the wider food system, including the production sector, the draft plan makes no substantive reference to the [National Good Food Plan](#). Unless strengthened, the finalised CCP will fail to support the outcomes sought in the Good Food Plan - and the lack of ambition for agriculture reform in the draft CCP will undermine the intentions of the Good Food Plan.
- The apparent assumption, made in the indicative statement and elsewhere, that a reduction in livestock numbers would have "a detrimental impact on our agriculture sector and wider rural economy" is unproven. First, the overall value, profitability and employment rates in the agriculture sector are not related directly to livestock numbers – which have risen and fallen over the years. Indeed, some forms of extensive production, with fewer animals per hectare, can be as beneficial in economic terms as more intensive systems, yet are of considerably greater benefit in reducing emissions and improving biodiversity. Secondly, the agriculture sector is only part of the wider rural economy and, should part of this sector shrink, a just transition would imply the development of alternative opportunities – both in other land use sectors (forestry, conservation, etc) but also the wider economy (often enabled by the growth of online working).
- The draft CCP, read with the policy statements cited above, is also internally inconsistent. For instance, it is suggested that the Scottish Government "has no policy, and will have no policy, to cut livestock numbers". Yet, annex 3 of the draft CCP makes clear that the baseline for



emissions reduction projections includes “a downward projection in livestock numbers” (page 68). Thus, while the Scottish Government may currently have no proactive policy to reduce livestock numbers, it is implicitly suggesting that some reduction will occur (presumably because of wider land use changes, market/consumption patterns, etc) and that it has no policy to prevent this reduction. Thus, in practice, it is accepting in part the assumptions/proposals of the CCC. In SCCS view, it would be preferable to fully accept the CCC assumptions/proposals, including on diets, and to ensure a managed transition to lower livestock numbers, managed more sustainably.

Nevertheless, despite these inconsistencies, false assumptions and missed opportunities, the Scottish Government has, in the draft CCP, chosen to adopt an approach that leads to fewer emissions reductions than are and should be possible. As a result of those choices (along with those in other sectors), the Scottish Government’s proposals result in a greater need to deliver removals; from tree planting and peatland restoration (see comments under LULUCF below) but, primarily, by unpredictable NETs (see our concerns under industry above).

Given the above, the policy choices should be revisited for a number of reasons: -

- to enable the Scottish population to benefit from a healthier and more sustainable diet;
- to reinforce and help deliver the policy intentions of the National Good Food Plan;
- to revisit the alleged ‘automatic’ link between livestock numbers and a thriving rural economy that benefits rural communities, and acknowledge the fall in livestock numbers implicit in the baseline; and
- to secure emissions reductions in the agriculture sector closer to the CCC pathway and thus reduce the risks from an over-reliance on NETs.

SCCS recommendations:

- The finalised CCP should acknowledge and introduce robust policies related to dietary change, especially reduced meat/dairy consumption – consistent with current public health advice. This should aim for a lower average consumption⁶, with a consequent impact on demand and thus production, as set out by the CCC.
- The finalised CCP should more openly acknowledge the implicit and expected fall in livestock numbers within the baseline and set out policies to ensure a just transition for rural economies that take account of this fall and additional reductions associated with the dietary changes and wider changes in agricultural policy to favour extensive, sustainable, low emission production.

(b) Land Use, Land Use Change and Forestry (LULUCF)

SCCS agrees with the CCC about the value and potential of Scotland’s land assets and that one of the main reasons Scotland can seek to achieve a 2045 net-zero target is because of “the excellent opportunities to remove CO₂ from the atmosphere through the likes of peatland restoration or afforestation.”⁷ Thus, in principle, we fully support policies to support and expand increased afforestation and peatland restoration. However, we are concerned that the draft CCP is somewhat lacking in ambition for this sector. Land use is one of the biggest sources of emissions and is currently the only viable route to increase sequestration (given the doubts and uncertainties related to NETs - see above). Therefore, land use will be central to our net zero journey, but the ambition set out in the draft CCP is low compared with the challenge and its potential.

This lower ambition is perhaps related to the choices, made in the draft CCP, not to promote healthier diets or proactively reduce livestock numbers. The limited change in agriculture means that less land

⁶ Note: while a vegan or vegetarian diet will be an appropriate choice for some, SCCS does not advocate 100% adoption of this approach – but rather a reduced average consumption, based on more extensive and environmentally-friendly rearing of fewer livestock. Of course, in parallel, an increased consumption of (wild) venison may also contribute positively to the forestry and woodland expansions goals set in the LULUCF chapter.

⁷ Note: we are aware that CCC include CCUS in the sentence quoted but, on that issue, SCCS members’ views differ somewhat from the CCC and Scottish Government – see our comments on NETs under energy supply.



is freed up for other uses. So the plan's policies on farming feed through into lower ambition in land use and forestry, which in turn means an over reliance on costly and potentially undeliverable NETs.

We also support and encourage the concept of a strategy approach to land use, and the development and publication of a Land Use Strategy (as required by s.57 of the 2009 Act, as amended). We note, therefore, the commitment to a fourth iteration of such a strategy by the end of March 2026 and look forward to engagement in its development. However, in so doing, we also note the apparent ineffectiveness of the first three iterations in driving any transformation in land use policies – rather, they have simply restated existing policies regarding agriculture, forestry and other land use matters. As such, it is arguable that recent Land Use Strategies have failed to meet the requirements of s.57(3)(a), but we hope the next (4th) iteration will be more effective in both describing, but also encouraging, changes in these sectors.

On afforestation, we welcome the proposed increase in annual woodland creation rates. However, we note (and agree with) the observation that this “will depend on .. adequate funding for the Forestry Grant Scheme (FGS) over the next 15 years” and that “recent cuts to funding undermined forest sector confidence about investing in woodland creation in future”. We hope the suggestion that this might be “addressed through a multi-annual agreement on funding for the FGS” is followed up and confirmed in the finalised CCP.

While welcoming the new woodland expansion targets, we note that the specific policies set out to deliver this outcome are, in effect, already government policy (albeit potentially positive and welcome). This underlines the importance of securing long-term and increasing funding for FGS as the key mechanism to achieve the afforestation vision.

Notwithstanding the above, if these measures are to maximise carbon sequestration as well as deliver the suggested “enhancements to biodiversity, landscape and tourism”, then there needs to be a clear policy to ensure that a significant proportion (50%+) of new planting and/or regeneration is native woodland. Appropriately sited native woodland delivers real biodiversity benefits and, in the long term, represents the near-permanent sequestration of carbon (whereas a significant proportion of carbon captured by fast-growing non-native conifers will be (re)released when harvested/processed).

In addition, it must be recognised that the vision is to increase Scotland’s woodland cover from the current 19% to 24% by 2040. Thus, policies focused purely on new planting/regeneration only address this ‘new 5%’ (or c.21% of the expected 2040 woodland area). It is also necessary to ensure the protection and enhancement of the existing 19%, including the delivery of ongoing positive management (and replanting or natural regeneration when harvested). The CCP, therefore, needs to support (or at least cross reference) policies to protect areas of native woodlands that are designated for their conservation value, to encourage positive management of existing woodlands (including deer management) and to ensure any harvesting is followed by replanting or regeneration.

On peatlands, we welcome the significant emphasis in this chapter on the protection, maintenance and restoration of Scotland’s peatland resource. This represents a continuation of existing policy; yet, is vital to mitigating emissions from degraded peatlands (and use of peat in horticulture) and enabling future sequestration.

We therefore welcome the commitment to “continue our work alongside other UK nations to ban the sale of peat for horticulture in Scotland”. However, while positive, this statement contains no timescale or indication of what action the Scottish Government is taking to ensure or press for rapid delivery. As the [UK Government’s Carbon Budget and Growth Delivery Plan](#) (see page 78) includes a policy to legislate for a “ban on the sale of peat and peat-containing products”, progress in the delivery of this policy should be possible in the short-term and a clear timetable included.



Meanwhile, the Scottish Government should be preparing and passing⁸ regulations for a ban in Scotland. As a means of encouraging action in other parts of the UK, or to enable action in Scotland if there is no progress elsewhere, the Scottish Government should also formally seek an exclusion under the UK Internal Market Act 2020 – to enable a ban in Scotland to proceed even if progress elsewhere is stalled.

On peatland restoration, we fully support the proposal to “increase peatland restoration by 10% each year to 2030 and maintain levels after that leading to the restoration of more than 400,000 hectares by 2040”. This does represent an increase in restoration goal but is also, arguably, a retreat in overall ambition (the previous target being to restore 250,000ha by 2030, from 2020). It is also still only a proportion of the damaged area of peatland - the majority will be left unrestored. This increased overall, long-term target (at an arguably reduced rate) possibly recognises the practicalities of delivery.

So, to enable a further increase in ambition in future CCPs, and to address the long-term challenge of unrestored peatland, this iteration of the CCP should include measures to address delivery blockages. It should also recognise that activities that degrade peatland (such as burning and over-grazing) need to be addressed. Thus, the disappointing [delay in implementing muirburn licensing](#) must be the last postponement and burning on deep peat should be generally prohibited from autumn 2026. Moreover, the deer management legislation (as to be improved by the Natural Environment (Scotland) Bill) and agriculture policies (see above, especially with regard to livestock numbers) must be implemented to reduce over-grazing of peatland.

SCCS recommendations:

- The finalised CCP should confirm new woodland expansion targets but also include a clear policy to ensure that a significant proportion (50%+) of new planting and/or regeneration is native woodland.
- The finalised CCP should support (or at least cross reference) policies to protect areas of native woodlands that are designated for their conservation value, to encourage positive management of existing woodlands (including deer management) and to ensure any harvesting is followed by replanting or regeneration.
- The finalised CCP should commit the Scottish Government to introducing regulations for a ban on the sale of peat for horticulture in Scotland. To encourage action in other parts of the UK, or to enable action in Scotland if there is no progress elsewhere, the Scottish Government should also formally seek an exclusion under the UK Internal Market Act 2020.
- The finalised CCP should confirm new peatland restoration targets but also should include measures to address delivery blockages, so that targets can be increased in future. It should also recognise that activities that degrade peatland (such as burning and over-grazing) need to be addressed.

Sectors/issues without specific questions in consultation

(a) Marine

In [our March 2022 submission on the scope](#) of the next CCP, we observed:

“Marine issues are, in the current Climate Change Plan addressed only in part. This is partly due to limited data/understanding and partly as many marine issues do not (yet) fall within carbon accounting protocols. In addition, marine matters are divided between reserved (oil & gas, shipping, international fisheries negotiations) and devolved (conservation, fisheries management, renewables). SCCS considers that a comprehensive Climate Change Plan should address marine issues in full (albeit noting the relevant research needed and different responsibilities – as well as propose clear actions to maximise the potential for emissions’ reductions and adaptation at sea.”

⁸ Subject to coming into effect on the same day as parallel prohibitions in the rest of the UK.



Accordingly, it is welcome that marine matters are addressed as a specific section within the draft plan (p154-158 of annex 2). However, it is disappointing that this section focuses on reviewing research and other actions already underway – and proposes no new policies or proposals to protect or enhance blue carbon or reduce emissions from marine activities or habitats. The various “policies currently in place or under development” are already in place and are demonstrably ineffective to date – and require new momentum to realise their potential.

Thus, the draft CCP should be modified to include a roadmap of practical actions which will set out how the marine environment (and its dependent industries) can be managed to effectively address the climate crisis.

SCCS recommendations:

- The finalised CCP should commit to specific new measures to protect and enhance saltmarsh and seagrass habitats (ahead of their inclusion in the global greenhouse gas inventories).
- The finalised CCP should commit to the development of high-resolution and comprehensive maps of Scotland’s blue carbon stores to support the designation of Marine Protected Areas and implement management measures to protect the most vulnerable inshore sediments.
- The finalised CCP should set out increased investment in research and specific actions to protect blue carbon and decarbonise the fishing industry.

(b) International

SCCS is pleased to see the inclusion of a section, within the draft CCP, on “working internationally”, as this was a recommendation in [our March 2022 submission on the scope](#) of any CCP. It is also required by s.35(19) and s.35(24)(b) of the 2009 Act as amended. In particular, we considered that the CCP should address:

- Global, regional, intra-UK and bilateral diplomacy to encourage and agree country-based or co-operative action and/or finance (e.g., membership of Under 2 coalition, bilateral agreement with California, initiative on Loss & Damage at COP26).

As referred to above (see under just transition), it is positive to see the importance placed on ensuring Scotland, “as a global climate leader, does what it can to limit the emissions impact of the choices made in Scotland, both at home and abroad”. Notwithstanding the focus on reducing Scotland’s territorial emissions, it would be entirely incoherent to reduce emissions generated in Scotland by exporting these internationally. Further, the impact and credibility of Scotland’s international efforts will be fundamentally undermined without simultaneous action to reduce territorial emissions and those generated through the goods and services we consume in Scotland, but which are produced or provided internationally. This issue is also relevant to our concerns in relation to the Circular Economy Strategy and the impacts, overseas, of the consumption, in Scotland, of materials (e.g. lithium mining).

Accordingly, SCCS welcomes and supports the draft plan’s statement that “the Scottish Government is committed to working with and supporting our international partners to help secure a global transition to a net zero and resilient future in a way that is fair and just for all.” We further welcome the review of action to date, especially the launch of the Climate Justice Fund (CJF), and the impact this has had. However, it is an omission that the Scottish Government’s initiative, at COP26 and subsequently, to highlight and support action on Loss and Damage is not referenced, given its significance in helping to encourage the creation of the global Fund for Responding to Loss and Damage.

Moreover, the plan does not explicitly commit the Scottish Government to continuing or enhancing these actions. For example, the CJF should be maintained at a minimum of £12m in the first year of the next Parliament and then be uprated at least in line with inflation. It should be committed: in addition to wider Overseas Development Assistance; through grant-based funding mechanisms; and with climate-impacted communities leading project design and delivery.



At a time when, internationally, there is increased focus on the need to identify additional sources of finance to support climate action, as well as development, this section of the CCP should also include a clear commitment to championing the polluter pays principle. In this regard, we note the recent call from the [Global Solidarity Levies Task Force](#) for the Scottish Government, along with all governments that support the polluter-pays principle, to “turn words into action through concrete measures, such as taxing high-polluting premium class flights and private jets”. The Task Force has urged the Scottish Government to join the growing group of nations working together as part of the expanding Coalition for Solidarity Levies for Premium Flyers.

Further, given high-levels of unmet humanitarian need globally, in part fuelled by climate change, there should be a significant increase in Scotland’s Humanitarian Emergency Fund in the first year of the next Parliament, and then annual uprating at least in line with inflation, with a similar focus on supporting and enabling local humanitarian leadership.

All financial support to impacted communities must clearly be positioned not as aid, but as reparative support for a crisis Scotland has, and continues, to fuel.

In welcoming the inclusion of the ‘working internationally’ section to the CCP, to be credible, we stress that Scotland’s financial and influencing support for climate-impacted communities must be accompanied by emission reduction at home. As explored earlier, this must include action to reduce Scotland’s consumption emissions. It would be entirely incoherent to reduce emissions generated in Scotland by exporting these internationally.

SCCS recommendations:

- The finalised CCP should formally and explicitly commit the Scottish Government to enhancing work on international climate policy. In particular, the Climate Justice Fund should at least be maintained at a minimum of £12m in the first year of the next Parliament, and then protected in real terms, with a dedicated Loss and Damage element, and with the whole fund spent in a locally led, transparent and transformative way. The Humanitarian Emergency Fund should be significantly increased to support those facing crisis because of both rapid and slower-onset climate impacts.
- The finalised CCP should set out that the Scottish Government will continue to engage in the United Nations Framework Convention on Climate Change, using Scotland’s sub-national role to show international leadership, champion key issues like Loss and Damage, adaptation and a Just Transition at the talks and support the calls of Global South countries for greater equity and justice. The Scottish Government should also support the call from some of the world’s most climate vulnerable countries for a global Fossil Fuel Non-Proliferation Treaty.
- The finalised CCP should, to sustain and enhance global leadership, commit the Scottish Government to establishing a Centre for Excellence on Loss and Damage hosted at a Scottish University that would help build global knowledge.
- The finalised CCP should set out the Scottish Government’s commitment to the global Fill the Fund campaign.
- The finalised CCP should commit the Scottish Government to work that would identify and implement innovative “polluter taxes” (such as Private Jet tax, referred to above) to help fund the CJF and other climate action.

Section 3: Impact Assessments

The following questions concern the Business and Regulatory Impact Assessment (BRIA), Child rights and wellbeing impact assessment (CRWIA), Island Communities Impact Assessment (ICIA), Equality Impact Assessment (EQIA), Fairer Scotland Duty Assessment (FSD). The purpose of these impact assessments is to understand the effects of government policy on specific groups, including children and young people, island communities, business and equalities groups.

16. *Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?*



17. **How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?**
18. **If you identified there could be negative impacts of the Climate Change Plan, are there any ways you think we could reduce that negative impact and if so, what would you recommend?**
19. **Please share any other quantitative data, or sources of this, to assist in developing the impact assessments?**
20. **Are there any previous examples or case studies we should consider when assessing potential impacts?**
21. **Can you think of any further positive or negative impacts, that are not covered in the impact assessments, that may result from the Climate Change Plan?**

While SCCS itself has no particular expertise or data related to these matters, many of our members are very involved and we commend their responses.

Notwithstanding the above, SCCS fully supports the production of these assessments and recognises that climate policy, as articulated through the Climate Change Plan, will affect different groups and communities in different ways. These impacts will be both positive and negative – and, where appropriate, policy design must take account of this and ensure that adverse negative impacts are mitigated. It must be recognised that impacts, negative or positive, may be economic (and that such impacts may operate at the individual, community, regional or national level) or social (especially in relation to health).

In terms of economic impacts, SCCS considers that two overriding factors or principles should apply to assessments and to mitigation by policy design. These are:

- At a national level, it must be recognised that **acting on climate change generates economic benefits that far outweigh the costs**. This is recognised, in the draft plan, which indicates that “*the direct financial benefits ('cost savings and financial benefits') of delivering all the policies in this Plan is estimated at £42.3billion over the period from 2026 to 2040*” – compared to a net cost of £4.8billion. This net benefit must also be contrasted with [the costs of inaction](#); this was further demonstrated by [a recent OBR report that shows](#) very clearly that the cost of cutting emissions to net-zero is significantly smaller than the economic damages of failing to act.
- While negative economic impacts on individuals and communities who are unable to afford changes should be mitigated (by e.g. grants and subsidies) to ensure a just transition, these and other costs should be funded in accordance with **the polluter pays principle** – by raising revenue from those most able to pay and most responsible for emissions. Thus, in addition to just transition policies to support the less well-off, the plan and wider government policy on climate action must also include progressive revenue-raising actions to fund the transition. A range of such measures were explored in [SCCS' Fiscal measures report](#), published in 2022, and included in our current [set of policy proposals for the 2026 election](#). Further, as argued by the [Tax Justice Scotland](#) campaign, the tax systems at Global, UK and Scotland levels must play a much bigger role to support the response to the climate crisis. This includes fairly raising significantly more revenues and using taxation to incentivise behavioural change. Fiscal policy should complement regulatory interventions to incentivise and compel greener behaviours.

Finally, while the so-called ‘negative’ impacts of climate policy will always receive more attention (and should, as described above, be mitigated to ensure a just transition), it is also important that the positive impacts are recognised and highlighted. These benefits to public health, reduced NHS costs, greater food and energy security, growth in the low-carbon jobs market and a reduction in poverty and inequality – and have been expertly reviewed and described by [Jennings et al at Imperial College London \(2019\)](#).

Section 4: Strategic Environmental Assessment (SEA)



The following questions concern the SEA. There is a legal requirement to consult on the SEA Environmental Report (Environmental Assessment (Scotland) Act 2005). The purpose of the SEA is to assess the likely environmental effects of government policy, considers how negative impacts can be avoided or minimised and ways that positive effects can be enhanced.

- 22. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report? Are you aware of further information that could be used to inform the assessment findings?**
- 23. What in your view are the most significant environmental effects which should be taken into account as the Draft Climate Change Plan is finalised?**
- 24. What are your views on the predicted environmental effects as set out in the environmental report? Please share any other useful sources.**
- 25. What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?**

SCCS fully supports the process of Strategic Environmental Assessment (SEA) and the requirements of the Environmental Assessment (Scotland) Act 2005. We therefore welcome the publication of the [Environmental Report](#) for the draft CCP (albeit somewhat later than the draft plan itself was published).

In considering 'reasonable alternatives', the report concludes that this does not include consideration of a 'do nothing' scenario, as the CCP is a legislative requirement of 2009 Act, as amended. In the light of this and the declared climate emergency, it is evident that ambition can only be to achieve the maximum emissions reductions possible, reflected across all sectors based on current technical and practical limitations, and it was therefore concluded that no reasonable alternative could be identified.

However, despite the above, it must be noted that (for the reasons and comments made in our full response – see above), the draft CCP does not, in fact, achieve the maximum emissions reductions possible. This could and should and should be remedied (not least by implementing the SCCS recommendations set out above) – with consequent adjustments to the SEA process to take account of the changes.

Of course, SEA is a process and the production of an environmental report is not the conclusion of the process. First, account must be taken of the report (and responses to it) in finalising or adopting the plan (s.17 of the 2005 Act) and then there are post-adoption procedures in s.18-19. For these reasons, SCCS considers that the draft CCP should be updated according to the recommendations above (and these should be subject to an amended SEA).

This amended SEA, along with the current version, rightly includes "possible mitigation and enhancement" measures for each CCP sector. In the current version, these are presented in Section 4. SCCS notes, welcomes and supports, in particular, the following concerns: -

- There is the potential for negative impacts on biodiversity and landscape depending on the source of biomass required to produce Sustainable Aviation Fuel (SAF) and the harvesting practices utilised.
- Localised negative effects on soil may arise from the construction and operation of new waste facilities.
- Integrating Energy from Waste (EfW) facilities into heat networks requires careful planning and coordination with local authorities and energy providers.
- Potential negative effects were identified for biodiversity, landscape, and cultural heritage associated with retrofitting of industrial buildings and infrastructure changes for Carbon Capture and Storage (CCS).

As a result, the finalised CCP should include policies to ensure that planning and land use policies are in place to avoid or mitigate these potential negative impacts.



In particular, more work is needed to assess the implications and wider effects of proposed reliance on SAF to reduce emissions from aviation. Of course, this work should observe that these implications and wider effects will be fewer and smaller were the CCP to include stronger policies to encourage modal shift (from plan to train) and/or non-travel options. Thus, our recommendations above (see transport) in relation to emissions reductions have the potential to reduce the potential negative environmental impacts identified by the SEA, making those recommendations even more important. A similar argument applies to CCS; that is, if agriculture, buildings and other policies were more robust, there would be less need to rely on CCS and thus few potential negative impacts.

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions:

- 26. What are your views on the proposed approach to reporting annual emissions output and how this could support public understanding of Scotland's progress towards achieving our Carbon Budgets?**
- 27. How useful do you think reporting emissions statistics at a more detailed level (including at the sub-sectoral level), would be in helping people understand key sources of emissions, and our progress in reducing them?**
- 28. How might the use of timely indicators, as proposed, help people to understand what needs to be delivered to achieve our Carbon budgets, and to understand whether progress is on track?**

Section 6: Monitoring Just Transition

The following questions concern the 14 proposed indicators for monitoring and evaluation of the Climate Change Plan:

- 29. Please detail any specific changes that would improve any of the 14 proposed indicators, including any data sources not currently included within this framework that could provide a useful indicator of progress towards a just transition in Scotland on an annual basis.**
- 30. What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate? This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.**
- 31. What indicator would provide the best measure of the impact of net zero development in local communities across Scotland? For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).**
- 32. Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?**
- 33. What specific data or indicators could we use to meaningfully monitor the impact of the transition to net zero on the environment and biodiversity across Scotland on an annual basis?**

In SCCS' view, the following principles should apply to the monitoring frameworks to be adopted: -

1. The monitoring must assess outcomes (that is, emissions reductions, in MtCO₂e, overall and by sector) as well as progress indicators and delivery actions;
2. The monitoring must enable annual reporting of outcomes, progress indicators and delivery actions (thus, we support and welcome the provisions of s.33-34A and s.35B of the 2009 Act, as amended); and
3. The monitoring and reporting must be transparent with the results/reports published, laid in Parliament and made subject to annual Ministerial statements, together with appropriate scrutiny.



Subject to the monitoring and reporting frameworks (in relation to both emissions and just transition) complying with the above principles, SCCS supports the proposals made in the draft CCP, especially in annex 3.