

Joint representation to the Scottish Government Energy Consents Unit regarding the Peterhead Low Carbon CCGT Power Station Project

We, the undersigned, are calling on Scottish Ministers to reject the application by SSE Thermal Generation (Scotland) Ltd for the Peterhead Low Carbon CCGT Project (ECU00003433) on the following grounds:

Unacceptable climate impact

Approving this project **threatens Scotland's ability to reach our legally binding target of achieving net zero emissions by 2045.**

- The developer admits in the Environmental Impact Assessment that the project would have a “**moderate adverse and significant**” climate impact, which the Institute of Environmental Management and Assessment guidance states means the project “falls short of fully contributing to the UK’s trajectory towards net zero”, and that emissions from the power station would account for **42% of Scotland’s carbon budget in 2044.**
- A new project of this climate impact would force other sectors of the economy to reduce emissions much more rapidly than currently planned. We cannot afford to waste so much of our limited carbon budget when there are proven, cost-effective renewable technologies for electricity generation.
- The power station would continue **to run for at least 10 years beyond Scotland’s net zero 2045 date**, producing annual emissions of 680,000 tonnes CO₂.

The Scottish Government has not yet set the level of carbon budgets in law to replace annual targets, nor has it published a Climate Change Plan to deliver those emissions cuts or produced a plan for addressing such significant annual emissions beyond the net zero 2045 date. To approve this project without an understanding of the climate targets and plans, is unacceptable.

Upstream emissions and international climate impact

The EIA states that **over half of the total emissions from this project would be released outside Scotland** during the production and transportation of the gas used to burn in the power station.

- The Scottish Government has international obligations under the UNFCCC and the Paris Agreement to limit global warming and must not be responsible for increasing climate emissions, and impacts, elsewhere in the world.

- The EIA states that 57% of the lifetime emissions of the plant are upstream. However, this is likely a **gross underestimate** as the EIA has failed to account for the fact that, as North Sea gas production declines, the power station would rely on importing gas which would significantly increase the climate impact. Analysis suggests the UK could rely for more than half of its supply on imported LNG in the 2030s, including fracked LNG from the US, with a carbon footprint five times greater than the EIA has modelled.

Carbon capture failure

The application makes claims about carbon capture which have no basis in evidence.

- The EIA assumes that the plant would capture 90-95% of the CO₂ generated from the gas power station yet no other carbon capture project in the world has achieved this. A lower capture rate would result in an even greater climate impact.
- There are only a couple of pilot projects globally applying carbon capture on gas turbines, these are at a scale **approximately 20 times smaller** than what is proposed for Peterhead.
- Finally, the onward transportation and storage of any captured carbon from this power station is entirely dependent on the proposed Acorn Project at St Fergus, which **is not constructed, nor has it been submitted as a planning application**. Therefore, it is impossible to assess this application in its totality.

Based on these points, we call on Scottish Ministers to reject the application. Please consider this as a joint representation from the undersigned organisations.

Monday 7th July 2025.

Signed by,

Aberdeen Climate Action
Biofuelwatch
Campaign Against Climate Change
Christian Climate Action
Climate and Science Health Group
Common Weal
Creating a Sustainable Gryffe
Environmental Rights Centre for Scotland
Friends of St Fittick's Park
Fuel Poverty Action

Future Economy Scotland
Global Justice Now Scotland
Global Witness
Green New Deal Rising
Mothers Rise Up
MP Watch
Muir of Ord Residents
Nanas Against Fracking
North Sea Knitters
Oil Change International
Platform
Quakers in Scotland
Scottish Communities Climate Action Network
Scrap Carbon Capture
Stamp Out Poverty
Stop Climate Chaos Scotland
Time for Change Argyll and Bute
UCU Scotland
Uplift
Weald Action Group