



Friends of the Earth Scotland
Response to Scottish Government consultation
on Draft Climate Change Plan 2025
Submitted January 2026

About us

Friends of the Earth Scotland exists to campaign, with partners here and across the globe, for a just transition to a sustainable society. We are Scotland's leading environmental campaigning organisation; an independent Scottish charity with a network of thousands of supporters and active local groups across Scotland. We are also part of the largest grassroots environmental network in the world, uniting over 2 million supporters, 75 national member groups, and some 5,000 local activist groups.

We campaign for a world where everyone can enjoy a healthy environment and a fair share of the Earth's resources. Climate change is the greatest threat to this aim, that's why we call for a just transition to a 100% renewable, nuclear-free, zero-fossil-fuel Scotland.

Introduction

We welcome the opportunity to respond to the Scottish Government's consultation on the Climate Change Plan.

The CCP is the most important document published by the Scottish Government. Addressing climate change is one of the Scottish Government's four priorities, but above all, achieving net zero by 2045 is an existential matter, we risk global warming at a scale that will result in millions of excess deaths if emissions are not brought down and global warming slowed.

Friends of the Earth Scotland have shared with the Scottish Government and Parliamentarians many briefings on the various topics covered by this CCP

response, we would also be happy to meet with any Ministers and MSPs to discuss any of these issues further at any time.

The CCP as produced by the Scottish Government is lacking in both detail and policy and does not represent a robust plan. The Scottish next Scottish Government must go further than the policies outlined in this CCP if they wish to tackle the climate emergency and do it in a just and equitable way.

Given how late in the parliamentary term this document has been produced it will fall on the next Scottish Parliament to implement the policies outlined. We call on all those who will be in power after the next Scottish Parliament election to implement these policies and go further, to ensure that Net Zero is met as quickly as possible in a just and equitable way.

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.

- *What are your views on our approach to delivering a just transition for people and communities?*
- *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?*
- *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?*
- *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?

We welcome the Plan being underpinned by just transition principles as set out in the Climate Change Act. However, the lack of detail and lack of policies outlined fails to make this a credible plan for a genuine just transition, or a transition at all.

As detailed elsewhere in our response, we have major concerns about the credibility of the Plan as a whole, its overreliance on negative emissions technology and the lack of Plan B if this does not pan out. This lack of credibility impacts transition planning and confidence across all sectors.

Based on the principles of the Climate Change Act, the draft plan should include far more detail than is provided on how a truly just transition will be delivered, and of the impacts of interventions on workers and workforces. For instance, the draft plan should see projections on how policies and proposals will impact employment across each sector and different geographical areas.

As detailed in our report [Our Power](#), a genuine transition plan needs to lay out detailed pathways for workers that end in good, green, unionised jobs. Granularity of detail on these pathways is needed for worker confidence in a just transition.

With sectoral just transition plans and just transition plans for Grangemouth and Mossmorran also lacking sufficient implementation detail, and no plan in place for the wider oil and gas sector, it is disappointing to see very little new action outlined in the CCP.

The expansion of the oil and gas transition training fund is welcome, but does not go far enough to reduce barriers for workers such as duplication of training, and lack of paid time off to train. See [Tickets and Training report](#) and [Our Power](#) for more detail.

Whilst skills and training are crucial, major government intervention is needed to ensure there are jobs waiting for workers afterwards. We have seen some recent

clear examples of positive action such as the Grangemouth Jobs Guarantee, but this approach is not reflected in overarching policy or proposals. Instead of piecemeal responses to job losses, we need to see detailed and fully funded plans for carbon-intensive sectors, and investment at scale to build up Scotland's green industries.

The largest opportunities for [job creation](#) and skill transition for oil and gas workers exist in Scotland's wind industry, particularly within manufacturing and supply chain. However, an enormous ramp up in this supply chain is needed for these jobs to materialise. ScotWind developers have committed to invest 38% of their supply chain spend in Scotland, but without active government leadership, meeting this target will be difficult. Scotland currently lacks significant fabrication sites and will need about [19 facilities to fulfill these commitments, capable of supporting up to 25,000 direct jobs.](#)

Existing investment commitments will not be sufficient to capture social, economic and job outcomes from offshore wind. The STUC estimates that investment to the scale of [£2.5 billion – £4.5 billion](#) into Scotland's offshore domestic supply chain is needed.

Beyond supporting private investment, there is a lack of detail in the Plan on how public money can be used to better shape the transition. Government investment should come with strong conditionalities to ensure the benefits are captured for Scotland, and that jobs created in the renewables sector are good quality and unionised. [The Just Transition Commission recommends stronger conditionalities](#) as a key mechanism in strengthening just transition planning. The Scottish Government should set and champion Fair Work and Just Transition conditions across leasing, regulation, and public funding for both offshore and onshore wind projects.

The Just Transition Fund has so far been underwhelming in its impacts, [creating only 110 new jobs](#). Future Economy Scotland recommends [a wholesale review of the fund's mandate and governance](#), with a renewed focus on developing new green jobs and supply chains and reskilling workers, embracing the principles of community wealth building.



Different models of ownership would give the government more power to shape the transition and to generate revenue for the public purse. The Scottish government should pursue public ownership and equity stakes of key infrastructure such as ports and wind manufacturing. Both the [Our Power](#) report and the more recent [Transition on Our Terms](#) report show there is a high level of support within the offshore workforce for public ownership of our energy system.

A focus on areas more impacted by the transition is welcome, but interventions are insufficient and indicators do not capture enough detail.

We welcome the intention to renew the Just Transition Commission. However, the remit of the Commission should be strengthened in law, establishing it as a statutory and permanent body.

This section is lacking in detail and concrete plans. It is unclear on this alone how a Just Transition can be realised in Scotland.

Section 2: Sectoral Contributions and Policies and Proposals

Buildings (Residential and Public)

1. How can we decarbonise homes and buildings in a way that is fair and leaves no one behind?

The Scottish Government must urgently increase investment in and rapidly accelerate the rollout of area-based energy efficiency schemes (ABS). When designed and implemented effectively, these schemes offer a coordinated, place-based approach that enables the retrofitting of large numbers of homes and public buildings within a single area. Schemes must:

- (a) Focus on rapid upscaling & increased investment into retrofitting programmes delivered at neighbourhood (area based) scale including public buildings, businesses & homes. This must meet the highest energy

efficiency standard such as Passivhaus or a rigorous Scottish Passivhaus equivalent

- i. Must be accompanied with meaningful and timely community level consultation, accessible information and increased autonomy over how people manage & maintain their own lived environment & communities.
 - ii. Adopt a “whole building” approach to retrofit. Retrofit schemes must move beyond piecemeal fixes and take a holistic view of energy efficiency needs –including fabrics, on a case-by-case basis. A coordinated, whole-building strategy will ensure a smoother, more efficient installation, that can reduce disruption and avoids repeated visits, delivering better outcomes for communities and faster progress on climate goals.
 - iii. Strong protections and guarantees must be put in place for tenants and those in social housing, including the removal of vague administrative fees, a guarantee of stable tenancies, and assurance that costs will not be unfairly passed on to tenants.
- b. Provide increased training and dedicated financial support for local authorities that recognises their pivotal role. This support should enable a coordinated, cross-departmental approach, bringing together climate adaptation, fuel poverty, and planning teams to ensure effective, integrated action at the local level.
- c. Unlock the jobs potential of community retrofitting. There is a significant, untapped employment opportunity in retrofitting public buildings & homes—through energy efficiency upgrades, climate adaptation and routine surveyance & maintenance cycles of retrofitted buildings. The Scottish Government must act now, in this crucial decade to harness this potential by providing clear pathways into the sector, with robust financial support for apprenticeships, training, and re-training. Income support should also be made available to self-employed and small business owners who need to step away from work in order to retrain.

2. *How can clean heating systems (such as heat pumps) be made more affordable for everyone?*

The Scottish Government must front-load clean heat deployment by offering grants and subsidies for anyone willing to switch to clean heating systems. This should include not just supporting people to make the switch to clean heating but greater investment in skills development and training to ensure that there is an adequately prepared workforce able to install clean heating and insulation at the large scale needed across Scotland.

Transport

1. *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*
2. *How can the Scottish Government support communities to participate in planning of local sustainable infrastructure (such as, walking, wheeling and cycling routes)?*



3. *What action by the Scottish Government would be most helpful in supporting you to live a more climate-friendly lifestyle?*

Friends of the Earth Scotland welcomes attempts to reduce emissions from vehicles. However we do not support the Scottish Governments overreliance on electrification of vehicles as a means to do this. For travel to be sustainable the Scottish Government must enact policies that represent a modal shift, moving people from cars to public transport and active travel. This will not only see benefits of reducing emissions but will create greater fairness and see health benefits for people across the country.

The draft plan is weak on modal shift and increasing public transport and active travel.

The Scottish Government must do more than simply shift all fossil fuel vehicles to electric vehicles. Electric vehicles require huge amounts of transition minerals, huge amounts of electricity and the degradation of roads and vehicles themselves contribute to pollutants in our air and large amounts of waste. However if we are to consider how to make electrification more affordable in question 1 the answer is 8. All of the Above.

Polices must be implemented to disincentivise road use, such as road user charging, parking charges, congestion charges and bus/cycle prioritisation. The Scottish Government should also provide greater support for local authorities for bus franchising through funding and simplifying the municipal franchising process.

By encouraging people to use active travel measures and supporting municipal bus ownership the Scottish Government will also encourage communities to be involved in the planning of their local infrastructure.

Waste

1. *Are there any additional proposals to support waste sector emission reduction that should be considered across the following 5 areas:*
 - a. *Strengthen the circular economy*

- b. Reduce and reuse*
- c. Modernise recycling*
- d. Decarbonise disposal*
- e. Other emission sources (including waste water and anaerobic digestion)*

There has not been as much progress on waste as this chapter presents. This is because, rather than a reduction in emissions, most waste emission have been transferred to the energy supply section of the CCP instead. This is because the main change in waste management in Scotland over the last 15 years has been a transfer in management from landfill to incineration (which is measured under the energy supply chapter). This is evidenced in the [SPICe report on waste management and the circular economy in the CCP.](#)

Consumption-based targets are needed

About half of the materials we consume in Scotland are imported. The carbon impact of imports is not measured in the climate change plan. This means that the Scottish Government policies around the way materials are used do not directly relate to the climate change plan and so are often overlooked, despite making up a significant proportion of the emissions related to Scotland. This has led to policies which resulted in carbon and jobs leakage from the Scottish economy.

The Climate Change Plan must address this gap in carbon accounting by adding **consumption-based target to the climate change plan or circular economy strategy**. Without a consumption-based target, key circular economy opportunities, such as the need to develop policies to cut plastic consumption, will continue to be overlooked and the carbon impact of Scotland's use of materials will be unsustainably high.

Lack of material considerations in the CCP

The lack of consideration of important materials and their carbon impact means that materials strategically important to the delivery of the CCP, including steel and critical minerals, are overlooked. Without these materials it will not be possible



to build the infrastructures and products needed to meet the CCP but the Scottish Government continues to overlook their importance. There is no Scottish steel strategy or critical mineral strategy. The government assumes these materials will be available whenever it needs them but there is a global shortage of some of these materials and extensive and serious human rights and environmental impacts associated with the supply chains of all of them. *The Scottish Government must develop steel and critical mineral strategies which align with the CCP.*

For more details on the need for consumption-based commitments, please see the Friends of the Earth Scotland [response to the draft CE strategy](#).

The CE strategy

The CCP relies heavily on the CE strategy. However, the expected carbon abatement of policies proposed in the CE strategy are not quantified (or mentioned at all). Therefore, it is not possible to say if the CE strategy will achieve the required carbon savings of the CCP.

Incineration

On incineration, this should be measured under the waste sector of the CCP. The Scottish Government has agreed to set a cap to reduce incineration. **This cap should be in line with CCP emission reduction plans.**

The Scottish Government's draft Climate Change Plan set out its intention to mitigate incineration emissions with carbon capture and storage (CCS). CCS is a dangerous distraction and an expensive and unrealistic plan to mitigate incineration emissions. No new incinerators are expected to be built in Scotland beyond 2027. CCS will not be ready by this time so the only option would be to retrofit the technology to incinerators. Retrofitting CCS to incineration plants has not been attempted anywhere in the world. It is too expensive, geographically difficult and unproven to be worthy of investment. **The Scottish Government should remove plans to fit CCS to incinerators in Scotland. Instead, it should be investing resources and funds higher up the waste hierarchy, especially reuse and repair.**

Plastics



99% of plastics are made from fossil fuels and plastics production is expected to triple by 2060. Neither the CCP nor the CE Strategy mentions plastic. It is essential that Scotland has a plan for reducing plastic production, consumption and safe management of disposal. Specific actions around plastics must include:

- Measuring and reducing how much plastic is produced in Scotland, how much is consumed and what happens to waste plastic.
- Enforcing and expanding the single use plastics bans.
- Conducting research on the impacts of chemicals in plastic on people and nature, including health costs, and recommendations on how to reduce these impacts.
- Banning the burning of plastic in incinerators.
- Enforce bans on exporting plastic waste.
- Improve recycling data reporting to understand how much plastic is sent to recycling, how much is actually recycled (and where and how) and what happens to the rest.
- Invest in affordable, reusable alternatives to plastic-based systems such as packaging.

Please see the [Friends of the Earth response](#) to the CE strategy consultation for our full commentary on the CE strategy.

Extended Producer Responsibility

The Scottish Government should create an ambitious and comprehensive EPR programme for Scotland. In the first five years, the Scottish Government should aim to create EPRs for at least five product categories. Product categories linked to significant environmental harm should be prioritised.

The Scottish Government should revert to a specific focus on EPR, rather than product stewardship in general. EPR is a mandatory form of product stewardship that makes producers responsible for post-consumer waste, while product stewardship is a broader approach, often involving voluntary measures that shares responsibility for a product's lifecycle among all stakeholders, including producers, retailers, and consumers.

Food waste



Despite Scotland throwing away one million tonnes of food waste a year and levels increasing by 5% between 2013 and 2021, when the target was a 33% reduction, there is no mention of a food waste target in the circular economy strategy. Food waste is a key driver of climate emissions. None of the 'actions' listed in the plan, which focus on reporting and research, will directly deliver changes in food waste. It is not possible to understand what the Scottish Government's goals around food waste reduction are or how they are going to achieve them with this plan.

In summary, the following additions are needed to the waste sector chapter in the CCP:

- Strengthen the circular economy: add consumption-based targets, introduce an ambitious extended producer responsibility programme, introduce requirements for steel and critical mineral plans.
- Reduce and reuse: invest in reuse and repair
- Modernise recycling: Adopt a plan based on the success in Wales to improve recycling rates – standardisation of recycling systems and statutory targets.
- Decarbonise disposal: set targets for reducing plastic production, consumption, disposal and export, enforce single use plastic bans, ban the burning of plastic waste, remove plans to add CCS to incinerators in Scotland
- Other emission sources (including waste water and anaerobic digestion): introduce a food waste target and measures to meet it.

Energy Supply

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



Friends of the Earth Scotland strongly supports increased electricity being generated from renewable sources. This is of vital importance as in the coming years we will need to replace residual fossil fuel use, such as the gas fired powerplant at Peterhead, as well as aging nuclear stations and to meet the increase in demand for electricity that will come with an increase in electric heating, transport and industry.

It is disappointing to see just one question on energy supply in the CCP given it plays such an important role in Scotland's climate emissions and economy.

Given the importance of the energy sector we add some additional comments here.

Fristly, we strongly support a continuation of the policy of not supporting new onshore oil and gas (including fracking), and coal extraction. These policies should be confirmed in the finalised plan. We note with concern that the draft plan is also silent on offshore, North Sea, oil and gas only nothing, correctly, that historic declines in production are expected to continue. While licencing is the remit of the UK Government, the Scottish Government often make comment and specific calls to action in other reserved matters such as nuclear weapons, social security and foreign affairs. Therefore we believe the CCP should clearly call on the UK Government to begin a managed wind down of North Sea oil production in line with a just transition.

The plan makes reference to the existing Peterhead gas-fired power station and the current application for a "CCS-enabled" replacement plant. While the plan does not specifically mention either merits or downsides of the application the projections of high levels of removals by NETs and calls for the UK Government to confirm funding for Acorn and other CCS schemes implies that the Scottish Governments energy supply pathway includes such a CCS enabled plant. This is despite the fact that the CCC is clear that "there are no low-carbon dispatchable power stations that require the use of gas with CCS in [their] pathway"

Finally, the Scottish Government has included energy from the incineration of waste in their plans. Such energy is not renewable and should be considered extremely limited in use and scope. Emission from incineration have risen 6865% from 1990 to 2023. This will continue to rise as new incinerations are built. The best way to avoid emissions from incineration is not to build new incinerations. The final CCP should make clear it will not allow any new incinerators to be built or to come online.

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

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

The framing of this question is itself flawed. It assumes that the primary barrier to reducing industrial emissions while remaining competitive is a lack of financial or policy “support”, rather than whether CCS/ NETs are credible, effective or an appropriate use of scarce public funds. The Scottish Government cannot afford to gamble with climate targets now or in the future. **It must not rely on NETs including CCS/BECCS/DAC to meet carbon budgets**

The [Global CCS Institutes](#) latest report states that there are currently no CCS facilities in the world operating on gas-fired power stations like what is being promised at Peterhead 2. Existing CCS projects are largely pilot projects or linked to enhanced oil recovery (EOR), which are not comparable for projects in Scotland. Despite this the CCP treats the delivery of a new Peterhead gas power station with CCS as a given, even though it has not been approved.

Industry has already been promised vast sums of money, including [£80million for CCS](#), from the Scottish Government for what remains a fundamentally fossil fuel-based business model. [Analysis](#) by the Institute for Energy, Economics and Financial Analysis (IEEFA) shows that pledged UK CCS subsidies are already at £50 billion while delivering only around 8% of the emissions reductions required by 2050. More starkly, estimates put the total cost needed to fulfil all of the planned CCS projects in the UK

would require up to £408billion. The NETs industry does not face a lack of support; it receives an unprecedented level of financial subsidy.

The risk of over-support for CCS is compounded by the carbon budgets mapped out in the CCP itself. The jump in ambition between 2035 and the 2036–2040 budget is approximately 9MT effectively deferring emissions reductions into the future and relying on the assumption that NETs (including CCS) will emerge at scale and absorb huge amounts of emissions. This risk was [explicitly recognised](#) in 2021. In response to the 2020 Climate Change Plan update (CCPu) the then Environment, Climate Change and Land Reform (ECCLR) committee advised that the Scottish Government develop a “Plan B” should NETs fail to materialise. No such plan was produced. In the five years since, the evidence shows that [failure is the norm not the exception](#).

The jobs figures within the CCP pull directly from The Scottish Clusters own literature. The original study carried out by Biggar Economics on behalf of the Scottish Cluster is not publicly available and therefore the legitimacy of the job claims and ability to analyse the methodology arrived at for those figures is opaque. However, it is clear that those figures ignore the high failure rates of CCS projects and more recently the increased uncertainty regarding the announcement that a key partner –Storegga – is pulling out of the project. It is of critical importance that the nature of those jobs, their location, the length & the terms and conditions associated with them are made public.

The real question is not what further support industry needs to continue emitting carbon but whether vital public money and policy support should be used to prolong fossil fuel dependency at all.

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.



1. *Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?*
2. *How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?*
3. *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?*
4. *Please share any other quantitative data, or sources of this, to assist in developing the impact assessments?*
5. *Are there any previous examples or case studies we should consider when assessing potential impacts?*
6. *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?*

The transition to Net Zero will affect all of us in many different ways. However, we know that the negative effects of climate change are most strongly felt by women and girls, people on low incomes, and the global south. This is why the principles of a Just Transition must run through all aspects of Scottish Government climate planning.

The Scottish Government must also remember that acting on climate change generates economic benefits that significantly outweigh the costs. – The draft plan acknowledges this stating that “delivering all the policies in this Plan is estimated at £42.3billion over the period from 2026 to 2040” against a cost of £4.8billion. This also pales in comparison to the costs of inaction, [a recent OBR report](#) showed that the cost of reaching Net Zero is significantly smaller than the cost of failing to act.

Friends of the Earth Scotland also supports the polluter pays principle. The financial costs that may land on individuals and communities should be mitigated as much as possible, through grants and subsidies, but also by raising funds from those most able to pay and most responsible for emissions. The Scottish Government should act to ensure that those who can pay the most and who pollute the most, pay the most, such as large corporations and the ultra-wealthy. We echo calls

from colleagues in SCCS and Tax Justice Scotland for raising revenues by taxing polluting behaviours.

Section 5: Monitoring emissions reductions

The following questions concern the reporting of annual emissions reductions:

- 1. 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?*
- 2. 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?*
- 3. 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?*

For both monitoring of emissions reductions and the monitoring of the Just Transition whatever framework is adopted must adopt some key principles:

- The monitoring must assess outcomes, emissions reductions in MtCO2e overall and by sector, as well as progress indicators and delivery actions
- The monitoring must enable annual reporting of outcomes,
- The monitoring and reporting must be transparent with results and reports published, laid in parliament with annual Ministerial statements and parliamentary scrutiny.

Section 6: Monitoring Just Transition

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

- 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.

- *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.*
- *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).*
- *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?*
- *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?*

Whilst we welcome the inclusion of just transition indicators, what is presented is far too broad brush and missing the specifics of just transition – particularly in tracking transition pathways. The limitations of indicators outlined in the Plan itself are significant.

In particular the indicators fail to track pathways for workers and are therefore unable to capture whether a just transition is in fact happening for oil and gas workers. Indicator 3.1 fails to track how many fund recipients move into renewables, and 3.2 fails to track how many workers are moving into renewables from high carbon sectors. These indicators could both trend upwards and fail to capture significant job losses and a skilled workforce moving overseas, for instance.

We welcome focus on the North East but again this needs more granularity – particularly on impacted groups and certain workforces. For instance, Indicator 2.3 looking at employment fails to capture the granular impacts of interventions –



without knowing where jobs are being lost and gained there is no clear view on what kind of transition is happening.

Broad brush indicators that track self reported opinions of the general public rather than of impacted workers and communities – such as 1.1 – are insufficient to capture the impacts of interventions.

Targets are necessary for indicators, not just trends. The ambition of 'increasing' is insufficient and in many cases represents a bare minimum.

In general, there is far too much reliance on self-reported survey data throughout these indicators.

It is clear that the Scottish Government do not currently have much of the detailed and good quality information needed to get a clear view of the impacts of interventions. It should be a priority of the government to begin gathering and preparing better and more indicative data, particularly around specific workforces and worker pathways.