

Appendix A

Proposed Responses

Proposed responses have been provided for each of the following sections:

- **About you** (6 questions)
- **Organisation details** (2 questions)
- **Electricity** (6 questions)
- **Buildings** (6 questions)
- **Transport** (6 questions)
- **Industry** (6 questions)
- **Waste and circular economy** (6 questions)
- **Land use, land use change and forestry** (6 questions)
- **Agriculture** (6 questions)
- **Negative emissions technologies** (6 questions)
- **Non sector-specific questions** (5 questions)

About you

1. Please read the privacy notice below and tick the box below to show that you understand how the data you provide will be used as set out in the policy.

Yes - I have read and understood how the personal data I provide will be used.

2. How your response will be published

Yes - I would like my response to be published in its entirety.

3. What is your name?

Robbie Seale

4. What is your email address?

robert.seale@eastdunbarton.gov.uk

5. Are you responding on behalf of an organisation? If you answer yes, please also answer the questions on the Organisation details page.

Yes

6. Please choose which sector(s) you want to tell us about. You are welcome to limit your responses to particular sub-sectors or examples within these if you want to (e.g. cultural, public sector fleet vehicles, NHS activities etc.):

Yes - Electricity

Yes - Buildings

Yes - Transport

Yes - Industry

Yes - Waste and Circular Economy

Yes - Land Use, Land Use Change and Forestry

Yes - Agriculture

Yes - Negative Emissions Technologies

Organisation details

1. Name of organisation

East Dunbartonshire Council

2. What type of organisation do you work in?

Public sector organisation

Electricity

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the electricity sector?

Explore ways and advocate for the low cost of renewable generated electricity to be passed on to users

The most fundamental thing to accelerate the electrification of heating and transport, which are core aspects of reaching net zero, is passing on the low cost of renewably generated electricity to users. The high cost of electricity relative to gas is particularly pronounced in the UK where electricity prices became more expensive than in any EU country in 2024. Paradoxically, renewable energy is a significantly cheaper means of generating electricity than fossil fuels, however, these savings are not passed on to consumers due to a variety of artificial costs including carbon taxes, coupled electricity and gas rates and policy costs.

As the CCC note:

"In many key areas, the best way forward is now clear. Electrification and low-carbon electricity supply make up the largest share of emissions reductions in our pathway, 60% by 2040. Once the market has locked into a decarbonisation solution, it needs to be delivered. The roll-out rates required for the uptake of electric vehicles (EVs), heat pumps, and renewables are similar to those previously achieved for mass-market roll-outs of mobile phones, refrigerators, and internet connections"

In short, keeping the current, artificially high, cost of electricity is the single most effective way to slow Scotland's transition away from fossil fuels.

Policies to support rapid acceleration of grid capacity including demand reduction measures

Specific examples of demand reduction include setting minimum energy efficiency standards to retain heat and reduce heating demand, rapid expansion of segregated active travel infrastructure and reliable, affordable bus and rail options to give people viable alternatives to individual car use and to ease pressure on the grid as the proportion of vehicles that are electrified increase.

While renewable energy has clear and compelling advantages over fossil fuels in terms of energy security, cost, long-term local job creation, and environmental outcomes, there is a risk that

supporting infrastructure for grid extensions is not accelerated at the required pace set out in the CCC carbon budgets. This challenge is compounded by the fact that grid capacity will have to expand at pace to accommodate the increased demand for electrified transport and electrified heating systems coupled with future energy intensive developments from data centres and the increasing use of AI.

Consequently, ways of reducing electricity demand while accelerating the transition to net zero - such as increased active travel infrastructure and public transport provision to reduce electricity demand from transport and more extensive energy efficiency measures to reduce electricity demand from buildings – should be cited as key infrastructure required to meet Scotland’s energy needs and support exportation of renewably generated electricity.

Funding and support for regional City Deal partnerships to develop Regional Energy Masterplans to accelerate local renewable investment by leveraging additional private investment

City Deal partnerships are uniquely well-equipped to establish collaborative partnerships to identify renewable energy potential based upon geographical and geological potential across their boundaries and to leverage private investment to support the development of such initiatives.

Further information is available in the sources below:

- Nesta (2024) [For the first time, UK household electricity prices rose to levels higher than those in any EU country](#)
- International Energy Agency (2024) [Rapid rollout of clean technologies makes energy cheaper, not more costly - News - IEA](#)
- Nesta (2023) [The electricity-to-gas price ratio explained](#)
- Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)
- Scottish Parliament (2023) [Urgency needed to create capacity in Scotland’s electricity infrastructure](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the electricity sector?

Given the emphasis Scottish Government has placed on climate action being taken as quickly as possible and being compliant with a Paris Agreement-aligned 1.5C scenario, these actions should be accelerated urgently.

The CCC is emphatic on the significance of electrification:

*"In many key areas, the best way forward is now clear. Electrification and low-carbon electricity supply make up the largest share of emissions reductions in our pathway, 60% by 2040. Once the market has locked into a decarbonisation solution, it needs to be delivered. **The roll-out rates required for the uptake of electric vehicles (EVs), heat pumps, and renewables are similar to those previously achieved for mass-market roll-outs of mobile phones, refrigerators, and internet connections**"*

Further information is available in the sources below:

- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

3. What are the expected costs of implementing these policies in the electricity sector?

All three options listed above present the opportunity for significant net benefits, as set out in other parts of this response, and while there are some upfront costs, their job creation potential and the fact that long-term financial savings, such as through reduced financial pressure on the NHS, would be achieved, underscore their credentials as spend to save investments.

4. What are the expected benefits of these policies in the electricity sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Renewables have clear advantages in terms of cost, environmental factors, local jobs, energy independence and reducing the UK's exposure to financial crises. As the CCC notes:

"Net Zero will increase economic security against fossil fuel price shocks, which have caused around half of the UK's recessions since 1970. There are also opportunities for new jobs in areas such as heat pump installation, and growing markets such as green finance. Clean, efficient, electric technologies will mean reduced air pollution and should mean lower energy bills than continued reliance on fossil fuel technologies."

Passing on the low cost of renewably generated electricity to users would help to significantly reduce energy costs and alleviate fuel poverty in Scotland. Improved energy efficiency measures, as described in question 1 in the Buildings section, would also contribute to these benefits.

Further information is available in the sources below:

- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

5. What do you think the key challenges would be in delivering these policies in the electricity sector?

Many policy levers for influencing the artificially high costs of electricity and passing on the low costs of renewables to users are reserved issues, so the Scottish Government's role may be limited to advocacy on this. However, reducing pressure on the grid by taking urgent action to expand grid capacity and setting long-term demand reduction measures, such as further efforts to increase modal shift and the introduction of MEES, are within Scottish Government's control and constitute strong opportunities to support electrification of heat and transport.

Further information is available in the sources below:

- Scottish Parliament (2023) [Urgency needed to create capacity in Scotland's electricity infrastructure | Scottish Parliament Website](#)

6. How could these policies support a Just Transition for workers and communities in the electricity sector?

Given the cost savings that would be passed on to people across Scotland, including the lowest earners through MEES (see response on buildings), making car-free living more viable (see response on transport) and passing on the lower renewable costs to users will provide significant benefits to the wider Just Transition agenda.

Buildings

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the buildings sector?

Energy Efficiency Measures including minimum standards

Improving energy efficiency standards is paramount to addressing fuel poverty, reducing emissions from buildings and reducing demands on the electricity grid to support broader decarbonisation.

Policies such as minimum energy efficiency standards for the private landlords, minimum energy efficiency standards with accompanying financial support for public bodies and registered social landlords, and policies to incentivise and support businesses in achieving improved energy efficiency measures would drive emissions reductions in buildings while supporting fuel poverty reduction and reduced pressure on the electricity grid. Ensuring the minimum standards are based on the reformed EPC rating and setting statutory dates to phase out the purchase of new direct emitting heating systems will also be key. The extension of Minimum Energy Efficiency Standards (MEES) to cover industrial activities, should also be explored.

Commitment for multi-year funding for Area Based Schemes from the Scottish Government would also support local authorities with longer term contractual awards and improved efficiency in delivering energy efficiency outcomes.

Policies to accelerate electrification of heat

As outlined in responses provided in the Electricity section, passing on the low costs of renewably generated electricity to consumers is crucial to promoting uptake of clean heating technologies.

Heat pumps are much more efficient than gas boilers, they operate on scale in climates much colder and more variable than Scotland's, and they reduce our dependence on a finite resource that is making the climate more hostile. Creating financial incentives to accelerate heat pumps' adoption is essential to deliver on the CCC's target of 40% of homes using low-carbon heating in Scotland by 2035, and this should be a priority. Facilitating a green skills transition to support this transition is also key.

Various scales of heat networks can also support the transition to zero direct emission heating and continuing the funding for feasibility work in this area is important. Supporting flexible tariffs, and setting clear customer protection and zoning regulations for heat networks will also play a crucial role in encouraging participation.

A national database which provides case studies of energy efficiency and zero emission heating installation on the most common building archetypes across Scotland would be particularly valuable. This could be accompanied by policies that accelerate communities' and the Climate Hub's access to information on clean heating systems, solar panels and energy efficiencies including case studies, myth busters and information on the wider benefits would help to overcome barriers to their adoption.

Whole life emissions and embodied carbon

The construction industry accounts for approximately 62% of total waste generated in the UK, primarily driven by demolitions and excavations. According to the Chartered Institute of Building, new buildings tend to create a greater carbon impact than reusing or repurposing existing buildings. However, demolitions are frequently still prioritised over retrofits due to various pressures and perceptions on building efficiency, demand for more facilities like social housing, and limited funding for refurbishments.

Policies should prioritise refurbishment and repurposing over demolition and new constructions. For example, policies could focus on working with the private sector to support the introduction of green mortgages and low-interest loans and investments for clean heat infrastructure projects and retrofits. Whole life carbon emissions, comprising of operational carbon (emissions during building use) and embodied carbon (emissions during building construction, maintenance and end of life stages) must be central to the CCP's approach to building decarbonisation. Wider regulations covering embodied carbon could incentivise improvements to planning construction projects and managing estates to ensure long-term sustainability in the construction sector.

Scotland's Zero Waste plan currently mandates developers to submit a Site Waste Management Plan. These requirements can be further strengthened by setting local PAS 2080 standards, circular economy statements and pre-demolition audits to set developer responsibilities to properly manage environmental impacts and embodied carbon throughout a building's life cycle. Enacting these standards can support a foundational transformation within the construction industry to plan for the entire life cycle of buildings, from material sourcing, transportation and assembly to usage, demolition and sustainable disposal.

Further information is available in the sources below:

- World Economic Forum (2021) [How can we reduce the construction industry's carbon footprint?](#)
- Nesta (2024) [For the first time, UK household electricity prices rose to levels higher than those in any EU country](#)
- International Energy Agency (2024) [Rapid rollout of clean technologies makes energy cheaper, not more costly - News - IEA](#)
- Nesta (2023) [The electricity-to-gas price ratio explained](#)
- Institution of Civil Engineers (2023) [PAS 2080: Carbon management in buildings and infrastructure guidance | Institution of Civil Engineers \(ICE\)](#)
- The Chartered Institute of Building (2014) [CIOB-research-The-Real-Face-of-Construction.pdf](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the buildings sector?

As soon as possible, with the CCC's interim targets for zero emission heating systems and energy efficiency being adopted for buildings.

3. What are the expected costs of implementing these policies in the buildings sector?

While some of the costs of MEES are anticipated to come from private landlords, costs to Scottish Government will include providing sufficient resource for Councils to undertake the additional enforcement duty and providing low interest loans to support landlords.

Funding incentives for insulation upgrades and adoption of solar PV, particularly for lower earning owner-occupiers, those living in fuel poverty and small and medium enterprises, will also be crucial.

If the low costs of renewable generated electricity can be passed on to users, this will create compelling financial incentives for the adoption of heat pumps / participation in heat networks thus limiting the costs for Scottish Government. However, in the absence of progress in addressing artificial price mechanisms that keep electricity costs high for users, significant grants and

subsidies will be essential to achieving the transition to zero emissions heating systems required to deliver on Scottish Government net zero targets.

4. What are the expected benefits of these policies in the buildings sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Scottish Government figures note that the private rental sector in Scotland is made up of around 300,000 homes with approximately 44% of people in privately rented homes living in fuel poverty. Around 48% of PRS properties are at EPC band D or below, and the sector has the highest percentage of EPC band E, F or G rated properties across tenures at 14%, compared to 5% in the social rented sector and 11% in the owner-occupied sector. Accordingly, the Private Rented Sector has some of the highest rates of fuel poverty in the country and improved insulation and other energy efficiency measures (as set out in Scottish Government's proposed Minimum Energy Efficiency Standards (MEES)) is estimated to reduce emissions by 5% while also improving housing quality.

Warm homes resulting from energy efficiency improvements also improve health outcomes, especially for more vulnerable groups such as elderly, young children and communities with disabilities or health risks that can be exacerbated by damp, cold homes. Implementing MEES also support reducing energy costs for tenants and facilitating the transition to clean heating systems. Furthermore, installation of clean heating systems can be paired with on-site renewable energy generation and battery energy storage systems to allow tenants / building occupiers to benefit from any available flexible tariffs and zero-bills schemes, while reducing demand on the electricity grid. The introduction of these measures would therefore help achieving dual targets of alleviating fuel poverty and reducing contributions to climate change.

Further information is available in the sources below:

- Scottish Government (2023) [Scottish House Condition Survey: 2023 Key Findings](#)
- Scottish Government (2025) [Draft Energy Efficiency \(Domestic Private Rented Property\) \(Scotland\) Regulations: consultation - gov.scot](#)

5. What do you think the key challenges would be in delivering these policies in the buildings sector?

Ensuring the low-cost of renewably generated electricity is passed on to users is critical to creating financial incentives to move away from gas boilers to more efficient zero-emission heating systems such as heat pumps. While the technology exists to achieve net zero in buildings, bold political decisions are also needed to facilitate the transition including energy price reforms, minimum energy efficiency standards, incentivising retrofits to reduce embodied carbon, statutory phase-out dates for direct fossil fuel emitting systems. and the provision of significant grants and subsidies to support the adoption of heat pumps required for Scottish Government to achieve its net zero targets and deliver on the CCC's carbon budgets.

While wood burning stoves tend not to be high greenhouse gas emitting systems, the health impact of particulate matter emissions from these heating systems and the consequent societal costs such as additional financial pressure on the NHS, create a financial and social case for restricting their use, especially in built up areas.

Ensuring a supply of skills for heat pump installations and maintenance will also be crucial to meeting the targets set out by the CCC, and by extension Scottish Government's net zero targets.

6. How could these policies support a Just Transition for workers and communities in the buildings sector?

Decarbonisation of buildings has major job-creation potential and will require an increase in the supply of skills including for the installation and maintenance of zero emission heating systems, energy efficiency measures and solar PV installation.

The Climate Change Committee's advisory group also note that a successful transition to a net zero economy requires a sufficient supply of skilled green economy labour workers and estimate between 135,000 and 725,000 new green jobs could be created by 2030 in the UK in sectors such as buildings retrofit, renewable energy generation and associated manufacturing industries. The Scottish Government's Climate Emergency Skills Action Plan & Implementation Plan and Future Skills Action Plan outline national strategies to achieve some of this job creation potential and respective skills training. However, there are also risks for jobs in existing high-carbon sectors, such as the installation and maintenance of fossil fuel boilers which will need to be phased out. Therefore, facilitating early green skills transition, upskilling and reskilling is imperative to ensuring the current and new workforce has the capacity to facilitate this transition, while ensuring their long-term job security.

Furthermore, Scottish Government policies can support collaborations with the private sector. Potential benefits could include green mortgages and securing low-interest loans and investments for clean heat infrastructure projects and retrofits.

Further information is available in the sources below:

- Scottish Government (2020) [climate-emergency-skills-action-plan-2020-2025.pdf](#)
- Scottish Government (2019) [Scotland's Future Skills Action Plan](#)
- Climate Change Committee (2023) [A Net Zero workforce - CCC](#)

Transport

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the transport sector?

Increase the proportion of the transport budget allocated to active travel and sustainable travel to reflect the CCC's modal shift requirements

Policies to achieve modal shift up the sustainable transport hierarchy are a key factor to reach net zero in the CCC's carbon budgets. The CCC's 7th carbon budget for the UK notes the following:

"Modal shift and efficient driving (11% of emissions reductions in 2035). Improvements to make buses and active travel more attractive, affordable, and accessible encourage 6% of baseline car demand (measured in car-kilometres) to switch to public transport and active travel by 2035."

Making car-free living more viable through improved safety measures for active travel, like extension of high-quality cycling infrastructure and improved public transport, also has significant poverty alleviation potential given the increasing costs of insurance and second-hand vehicles. Accordingly, the outcomes should include car-free living being made more viable to support poverty alleviation, reduced financial pressure on the NHS, improved air quality and additional co-benefits.

Proven solutions to overcome safety concerns, such as new high-quality, segregated, lit, and maintained cycle lanes have successfully achieved modal shift across Scotland and should be a core pillar of policy considerations. Specific targets to achieve the CCC's recommended modal shift, such as miles of new and/or improved high-quality walkways and cycling paths, should be set to maximise the co-benefits and justice in the transition while contributing to sustainable development as set out in the Scottish Government's draft Statutory Guidance for the Climate Change (Scotland) Act 2009. The implementation of sustainable and liveable places policies through the National Planning Framework 4 also has a core role in modal shift to ensure that new developments have access to sustainable and active travel options in addition to local core amenities.

Continued extension of electric vehicle infrastructure and promotion of policies required to create financial incentives for their adoption.

Electrification is a core part of transport's transition to net zero. Renewably generated electricity is cheaper than fossil fuels, but these lower prices are not passed on to users due to a range of artificial cost barriers. The artificially high price of electricity continues to slow the pace of decarbonisation of transport. While there are some financial incentives for the adoption of electric vehicles for people who can charge at home, more solutions are required to support those who cannot charge at home and to overcome the higher upfront costs of EV adoption. Passing on the low-cost of renewably generated electricity to users is therefore a core component of a just transition to net zero and while these prices are reserved issues, the Scottish Government should advocate changes necessary to incentivise decarbonisation.

Additionally, while EVs can be much cheaper to run for those who can charge them at home, this is not an option for many households. The Council cannot allow residents to trail cables across the footway due to the fact that it is a trip hazard or to reserve space on public roads for private vehicle charging due to the need for this space to be available for maintenance of infrastructure and the fact that it takes up public road space. Proposed solutions to making home charging more widely accessible should feature in the Climate Change Plan, such as trials of slit trenches for cables, to support EV adoption.

The Climate Change Plan should explore ways to halt the significant increase in the average size of cars in recent decades and the fact that larger vehicles are more dangerous - particularly for vulnerable people such as children, pedestrians and cyclists - while having a higher social cost on public infrastructure and taking up limited space, especially in towns and cities. Exploring policy mechanisms to halt the growth of average car size will also reduce costs for infrastructure maintenance and therefore help to alleviate the increasing financial burdens on local authorities.

Policies to reduce emissions from frequent fliers, excluding islands where there are limited transport options.

Despite the emission intensity of flying, the CCC recognises that there is unlikely to be a low-carbon option for flights operating on a significant scale by 2045. Approximately 70% of flights are for leisure and these emission intensive activities are skewed disproportionately to higher earners. Flights also contribute disproportionately to climate change by virtue of emissions being released into the upper part of the atmosphere. A frequent flier levy, which excludes islands with limited other transport options, would be conducive to a just pathway to net zero and should be a core policy consideration in line with the wording from the Scottish Government consultation on the Just Transition Plan for Transport "Those who are better off are responsible for a greater

proportion of transport emissions, and this needs to be reflected in our approach to meeting the costs of the transition.”

See sources below for further details:

- CCC (2025) [The Seventh Carbon Budget - Climate Change Committee](#)
- The Institute For Public Policy Research (2025) [Revealed: Car ownership eats up a quarter of poorest households' incomes | IPPR](#)
- Living Streets (2024) [The Pedestrian Pound makes the economic case for investing in better streets for walking and wheeling](#)
- Transport for London [Walking and cycling: the economic benefits \(tfl.gov.uk\)](#)
- The Scottish Government (2014) [A More Active Scotland: Building a Legacy from the Commonwealth Games](#)
- Sustrans (2024) [Walking and Cycling Index 2023: Scotland \(sustrans.org.uk\)](#)
- Sustrans (2023) [Why are cars getting bigger? A deep dive into how UK regulations are enabling car size growth](#)
- Scottish Government (2023) [National Planning Framework 4 - gov.scot](#)
- Scottish Government (2025) [Just Transition: draft plan for transport in Scotland - gov.scot](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the transport sector?

All three recommendations set out above should be implemented as soon as possible.

3. What are the expected costs of implementing these policies in the transport sector?

Given that physical inactivity costs the NHS an estimated £91 million annually and results in approximately 2,500 premature deaths each year in Scotland and active travel can nearly half these deaths through the benefits of increased physical activity, specific targets to improve active travel would deliver long-term public savings and should be considered as spend-to-save.

Similarly, modal shift to active and sustainable travel can reduce the pressure on public infrastructure which is increasingly strained due to increasing number of vehicles on the road and the increasing size of vehicles on the road. The spend-to-save nature of these investments should therefore be accounted for.

The frequent flier levy would raise revenue which could be ring-fenced to support sustainable transport infrastructure such as extended segregated active travel infrastructure.

4. What are the expected benefits of these policies in the transport sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Increasing the modal share of active travel contributes to wide-ranging societal benefits, including improving air quality, urban safety, and physical and mental health. Within the context of increases to the average costs of second-hand cars and car insurance, creating infrastructure that allows people to overcome safety concerns to live car-free has significant poverty alleviation potential. Active travel can also contribute to local economic wellbeing and pedestrianised town centres experience stronger financial outcomes.

An analysis on active travel estimates that active transport investment created £262 million in economic benefit for Edinburgh alone. Conversely, physical inactivity costs the NHS £91 million annually and results in approximately 2,500 premature deaths each year in Scotland. Active travel can nearly halve these deaths through the benefits of increased physical activity. As such,

barriers to active travel are not only climate challenges but also hamper health and economic outcomes.

Given the successful modal shift documented in the South City Way in Glasgow and other sites around Scotland where high-quality, segregated active travel infrastructure has been created, commitments to greater modal shift by providing funding for active travel infrastructure of this quality should be emphasised more heavily since the additional co-benefits that this would deliver for people and communities are emblematic of a just transition to net zero.

Increasing average vehicle size and traffic volumes are putting unsustainable pressure on infrastructure which has not been designed for such weights and volumes of traffic. Increasing maintenance costs of infrastructure compounds pressure on limited public finances. Ensuring that sustainable transport infrastructure is clearly framed as a preventative financial measure is key to slowing the exacerbation of this trend.

See the following for further information:

- Department for Transport (2014) [DfT publications template - colour \(Word 2013\) \(publishing.service.gov.uk\)](#)
- Sustrans (2016) [4464.pdf \(sustrans.org.uk\)](#)
- Living Streets (2024) [The Pedestrian Pound makes the economic case for investing in better streets for walking and wheeling](#)
- Transport for London [Walking and cycling: the economic benefits \(tfl.gov.uk\)](#)
- The Scottish Government (2014) [A More Active Scotland: Building a Legacy from the Commonwealth Games](#)
- Sustrans (2024) [Walking and Cycling Index 2023: Scotland \(sustrans.org.uk\)](#)
- Transport Scotland [A fairer public transport system for Scotland | Transport Scotland](#)
- Cycling Scotland (2025) [Investment in landmark cycle routes delivering record share of journeys by bike in Scotland | Cycling Scotland](#)

5. What do you think the key challenges would be in delivering these policies in the transport sector?

While the cost savings and benefits of active and sustainable transport are well documented, there is a lag between funding being set aside and the social, environmental, health and financial benefits being realised.

Across the west of Scotland, there has been a long-term decline in bus patronage, with a reduction of 21% between 2009/10 and 2019/20. This led East Dunbartonshire Council to pass a motion in December 2023 recognising that “existing bus services in East Dunbartonshire and across the wider region [are] not delivering for passengers or wider society within Strathclyde.” Key challenges cited include:

- Above inflation increases to bus fares
- Sustained patronage decline
- Shrinking network coverage
- Congestion induced delays

Addressing these obstacles will be essential to reduce private vehicle use and promote public transport. There is a clear financial case for facilitating access to active and sustainable transport given the increasing costs of car insurance and second-hand vehicles.

The outcomes do not reflect the significant increase in the average size of cars in recent decades and the fact that larger vehicles are more dangerous - particularly for vulnerable people such as children, pedestrians and cyclist - while having a higher social cost on public infrastructure and taking up limited space, especially in town and cities. Exploring policies to halt the growth of average car size will also reduce costs for infrastructure maintenance and therefore help to alleviate the increasing financial burden on local authorities.

While local authorities clearly have a central role to play in reducing transport emissions, the fact that local authorities are faced with significant financial pressures, including disproportionate exposure to inflationary pressures, increased demand for key services and increasing statutory responsibilities, means delivering on any additional requirements without additional resource will not be possible. Current global financial volatility may compound these financial challenges and further underscores the need for additional support being provided to increase the range of viable sustainable transport options available to residents.

See the following for further information:

- Transport Scotland (2022) [*A fairer public transport system for Scotland | Transport Scotland*](#)
- SPT (2024) [*clyde-metro-cfi-case-for-change-report.pdf*](#)

6. How could these policies support a Just Transition for workers and communities in the transport sector?

Marginalised communities are disproportionately affected by the lack of available and affordable public transport, which can be more expensive than driving. This results in many households being forced into car ownership or experiencing transport poverty due to lack of affordable public transportation. These financial challenges are being compounded by increasing insurance costs and increasing costs of second-hand vehicles.

The poverty alleviation-potential of improving access to sustainable transport and high-quality active transport infrastructure is well-documented. The Just Transition for Transport Consultation from earlier in 2025 published independent evidence suggesting that there is a link between households with higher incomes and higher harmful emissions from personal transport, while those on lower incomes are more likely to be reliant on public transport and more impacted by negative effects of emissions, such as air pollution, makes a strong case for the approach of “Those who emit the most pay the most, with protections for low-income groups.”

Accelerated decarbonisation would significantly support community resilience, as noted by the CCC's recent report on how reduced exposure to and dependence on fossil fuel markets would leave people less susceptible to economic shocks “Net Zero will increase economic security against fossil fuel price shocks, which have caused around half of the UK’s recessions since 1970.”

Providing information to young people and those who influence them on specific job opportunities and pathways to such opportunities – including details on apprenticeships, university courses and college courses – would help people from all walks of life to access the wide range of positions that a just transition would create.

See the following for further information:

- Transform Scotland Policy Forum (2022) [Fair Fares report -- Transform Scotland -- December 2022](#)
- Natcen (2019) [Transport, health and wellbeing: An evidence review for the Department for Transport](#)
- Scottish Government (2025) [Just Transition: draft plan for transport in Scotland - gov.scot](#)

Industry

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the industry sector?

As noted by the CCC with respect to Industrial electrification: “by 2035, the proportion of industrial energy supplied by electricity in our pathway doubles from levels in 2025, reaching around a third. This rises to 58% by 2045. Electric alternatives, such as electric steam crackers in the chemicals sector, replace most types of fossil fuel-fired industrial equipment. Electrifying industry allows manufacturers in Scotland to benefit from global demand for low-carbon goods.”

While these policies are less directly applicable to East Dunbartonshire Council given the relatively low industrial emissions in the area, it is noteworthy that the increased demand for electricity to decarbonise transport, heating, industry and other areas, coupled with projected increases in energy demands for data storage and AI, underscores the need for policies that would significantly increase renewable energy generation, grid capacity and scale-up demand restriction measures such as energy efficiency and active travel infrastructure at pace, as set out in other sections. Other measures to reduce industry emissions, such as an effective cap-and-trade system and carbon taxation, and the extension of Minimum Energy Efficiency Standards (MEES) to cover industrial activities, should also be included.

Further information is available in the source below:

- Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the industry sector?

As soon as possible.

3. What are the expected costs of implementing these policies in the industry sector?

Demand restriction measures can deliver public cost savings in addition to a wide-range of benefits.

4. What are the expected benefits of these policies in the industry sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

The co-benefits of moving away from fossil fuels includes reduced contributions to climate change, local jobs being created as opposed to jobs in larger fossil fuel countries, improved energy independence and improved economic resilience. As the CCC notes:

"Net Zero will increase economic security against fossil fuel price shocks, which have caused around half of the UK's recessions since 1970. There are also opportunities for new jobs in areas such as heat pump installation, and growing markets such as green finance. Clean, efficient,

electric technologies will mean reduced air pollution and should mean lower energy bills than continued reliance on fossil fuel technologies."

Further information is available in the source below:

- Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

5. What do you think the key challenges would be in delivering these policies in the industry sector?

As industry increasingly shifts to electrified production processes, creating the grid capacity sufficient not only to meet existing industrial electrification demand but also adequate to attract and encourage new inward investment, will require immediate action, at pace and scale.

6. How could these policies support a Just Transition for workers and communities in the industry sector?

Decarbonisation industry has major job-creation potential and will require an increase in the supply of skills including for the installation and maintenance of zero emission heating systems, energy efficiency measures and solar PV installation.

The Climate Change Committee's advisory group also note that a successful transition to a net zero economy requires a sufficient supply of skilled green economy labour workers and estimate between 135,000 and 725,000 new green jobs could be created by 2030 in the UK in sectors such as buildings retrofit, renewable energy generation and associated manufacturing industries. The Scottish Government's Climate Emergency Skills Action Plan & Implementation Plan and Future Skills Action Plan outline national strategies to achieve some of this job creation potential and respective skills training. However, there are also risks for jobs in existing high-carbon sectors, such as the installation and maintenance of fossil fuel boilers which will need to be phased out. Therefore, facilitating early green skills transition, upskilling and reskilling is imperative to ensuring the current and new workforce has the capacity to facilitate this transition, while ensuring their long-term job security.

Further information is available in the sources below:

- Scottish Government (2020) [climate-emergency-skills-action-plan-2020-2025.pdf](#)
- Scottish Government (2019) [Scotland's Future Skills Action Plan](#)
- Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

Waste and circular economy

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the waste and circular economy sector?

Policy to prioritise the overall reduction of waste – such as further limits on single use plastics and charges on plastics for supermarkets.

There should be a focus on implementing policies that prioritise the overall reduction of waste. Ideas could include further limits on single use plastics, including bags, as well as further charges on plastics for supermarkets.

In the 7th carbon budget, the CCC states that “Waste reduction is enabled by improving resource efficiency, reducing food waste and increasing recycling rates.” The CCC has several recommendations and assumptions for the Scottish Government to reduce overall waste levels to achieve a balanced pathway. These include:

- *Combined recycling rates for household and commercial and industrial waste, including non-household municipal waste, will need to reach 68% by 2035, an increase from 47% in 2025.*
- *Ensure actions outlined in the circular economy and waste route map are delivered on time and build on previous waste reduction targets.*
- *The need for a 39% reduction in total food waste per capita by 2030 compared to 2021 levels, which is aligned to the Courtauld Commitment 2030 and the UN’s Sustainable Development Goal (SDG) 12.3, which Scotland has committed to.*
- *The near elimination of biodegradable waste to landfill by 2028 across the UK. Even though Scotland intends to ban biodegradable waste from going to landfill starting at the end of 2025, this only covers municipal waste. The CCC recommends that both household, commercial and industrial waste should be included in this.*

Further information is available in the source below:

- *Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)*
- *Scottish Government (2024) [Scotland's circular economy and waste route map to 2030 - gov.scot](#)*
- *Climate Change Committee (2025) The Seventh Carbon Budget - CCC*

Policy to improve circularity in the economy

Zero Waste Scotland estimates that approximately 80% of Scotland's carbon footprint comes from our consumption of goods, materials and services. In addition, in Scotland, only 1.3% of resources are reused, compared to 8.6% globally and 24.5% in the Netherlands, the world leader in terms of circularity.

Policies should work to improve circularity within areas such as product development, food production and construction. Improving circularity requires application of the waste hierarchy to prioritise waste prevention and reuse over recycling, late-stage recovery, and disposal. Preventing waste from the outset of product design itself is key to reducing total consumption and waste emissions. This approach creates long-term cost savings, supporting the development of resilient supply chains that centre sustainability and empowering communities to consume responsibly and repair existing goods and products.

Further information is available in the source below:

- *Zero Waste Scotland (2021) [Everything we buy has a carbon cost | Zero Waste Scotland](#)*

Policy to improve circularity in development and construction sectors

Circularity principles are also key to construction and sustainable development. The construction industry accounts for approximately 62% of total waste generated in the UK, primarily driven by demolitions and excavations. According to the Chartered Institute of Building, new buildings tend to create a greater carbon impact than reusing or repurposing existing buildings. However, demolitions are frequently still prioritised over retrofits due to various pressures and perceptions on building efficiency, demand for more facilities like social housing, and limited funding for refurbishments. Policies should focus on improving circularity with construction and development.

Scotland's Zero Waste plan currently mandates developers to submit a Site Waste Management Plan. These requirements can be further strengthened by setting local PAS 2080 standards, circular economy statements and pre-demolition audits to set developer responsibilities to properly manage environmental impacts and embodied carbon throughout a building's life cycle. Enacting these standards can support a foundational transformation within the construction industry to plan for the entire life cycle of buildings, from material sourcing, transportation and assembly to usage, demolition and sustainable disposal.

As noted by the CCC, the key actions regarding CCS for the Scottish Government to deliver a balanced pathway in waste are as follows:

- “Ensure that new energy from waste capacity is only permitted where a viable route to connecting carbon capture and storage (CCS) can be established.
- Work with the UK Government, industry, and local authorities to bring forward plans for installing CCS at Scotland's EfW plants, including enabling development of the Scottish Cluster and assessing the feasibility of CCS at existing and future plants.”

It is important to note that CCS is currently unproven at scale relevant to national emission reductions. Therefore, while it is worth exploring for residual emissions, it should not be used as a basis to justify future emission intensive developments and delays to decarbonisation through proven routes. Scottish Government should also prioritise solutions that are proven at scale. Priorities for policies should follow the waste hierarchy to focus on waste prevention and reuse over recycling, late-stage recovery, and disposal.

Further information is available in the source below:

- Institution of Civil Engineers (2023) [PAS 2080: Carbon management in buildings and infrastructure guidance | Institution of Civil Engineers \(ICE\)](#)
- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)
- Scottish Government (2010) [Scotland's Zero Waste Plan - gov.scot](#)
- The Chartered Institute of Building (2014) [CIOB-research-The-Real-Face-of-Construction.pdf](#)

Policy to prioritise the need for higher recycling rates.

As noted by the CCC, the key actions needed for the Scottish Government to increase recycling rates to deliver a balanced pathway in waste are:

- For the Scottish Government to consider accelerating plans to introduce statutory recycling and reuse local performance targets, which are currently planned from 2030, to

increase recycling and waste reduction efforts ahead of the elimination of biodegradable waste going to landfill.

- *Increase household, commercial and industrial recycling rates to reach 68% by 2035.*

Recycling rates for municipal waste in Wales reached 66.6% in 2023-24, making it the nation with the second highest recycling rate in the world at the time, just behind Austria. Policies to emulate the recycling successes in Wales should be included in the CCP, with policies aimed at increasing recycling rates across all sectors, not only municipal waste, in Scotland, expanding on the Circular Economy Bill.

Further information is available in the source below:

- Welsh Government (2024) [Local authority municipal waste management: April 2023 to March 2024 \(headline results\) \[HTML\] | GOV.WALES](#)
- BBC (2024) [Environment: Wales second in the world for recycling rates - BBC News](#)
- Scottish Government (2024) [Circular Economy Bill passed - gov.scot](#)
- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the waste and circular economy sector?

As soon as possible.

Certain policies, such as the expansion on the charge for plastic bags, expanding the restriction of biodegradable waste in landfills and the emulation of the recycling rate successes seen in Wales can be implemented at pace.

3. What are the expected costs of implementing these policies in the waste and circular economy sector?

Implementing a circular model can reduce the overall cost for buying raw materials and making new products while creating jobs. Reductions in overall waste generated can also help to reduce the public cost of refuse collection.

4. What are the expected benefits of these policies in in the waste and circular economy sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Zero Waste Scotland estimates that approximately 80% of Scotland's carbon footprint comes from our consumption of goods, materials and services. In addition, in Scotland, only 1.3% of resources are reused, compared to 8.6% globally and 24.5% in the Netherlands, the world leader in terms of circularity. If Scotland can improve the circularity of the economy, not only will there be a reduction in the overall GHG emission from waste, but there will also be an increase in 'resource security' since less raw materials and environmental disruption would be needed for new product development. Additional potential co-benefits are as follows:

- *Reduction of overall GHG emissions*
- *Reduction in materials going to landfill*
- *Reduction of landscape and habitat disruption from raw material extraction*
- *The overall reduced material footprint increases 'material*

- Reduced costs for buying raw materials and creating new products, this savings could be passed on to the customer purchasing the product.¹²

Further information is available in the source below:

- Zero Waste Scotland (2023) [Circular economy business support | Zero Waste Scotland](#)
- Scottish Government (2024) <https://www.gov.scot/publications/environment-strategy-scotland-delivering-environment-strategy-outcome-scotlands-economy-evidence-base-policy-levers/documents/>
- [Circular economy: definition, importance and benefits | Topics | European Parliament](#)

5. What do you think the key challenges would be in delivering these policies in the waste and circular economy sector?

Policies can be introduced, but businesses and construction companies will have to implement circularity into their practices. There could be a current skills gap in refurbishments or retrofits which will need to be addressed.

6. How could these policies support a Just Transition for workers and communities in the waste and circular economy sector?

A move towards a circular economy could lead to the development of green skills and the creation of new jobs. The Climate Change Committee's advisory group also note that a successful transition to a net zero economy requires a sufficient supply of skilled green economy labour workers and estimate between 135,000 and 725,000 new green jobs could be created by 2030 in the UK in sectors such as buildings retrofit, renewable energy generation and electric vehicle manufacturing alone.

With the potential for businesses to have reduced costs for buying raw materials and creating new products, this savings could be passed on to the customer purchasing the product.¹²

Land use, land use change and forestry

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the land use, land use change and forestry sector?

Key parts of the CCC's UK 7th carbon budget and Scottish Carbon Budget include a reduction in meat and dairy consumption to free up land for nature-based solutions such as woodland creation and peatland restoration. Each iteration of the UK CCC reports has made this point which reinforces its central role as a facet of reaching net zero.

Policy should be designed to address the CCC recommendations "By the time of the Third and Fourth Carbon Budgets, the agriculture and land use sectors will be making the biggest contribution to emissions reduction in our pathway for Scotland. Together, agriculture and land use can reach Net Zero by 2045. Natural carbon sequestration, mostly increased tree planting and restoration of degraded peatlands, offsets the remaining emissions from livestock in 2045. This requires rapid scaling up of tree planting now because of the time it takes for trees to mature and start absorbing substantial amounts of carbon. The Scottish Government will need to support farmers and rural communities to diversify their incomes away from livestock farming and towards woodland creation, peatland restoration, agroforestry, and renewable energy."

Examples of this include implementation and support of Clyde Climate Forest targets. Across Glasgow City Region the average broadleaved woodland network area is 119 hectares. By 2032 the Clyde Climate Forest aims to increase the average broadleaved woodland network area to 142 hectares. Broadleaved woodlands provide essential ecosystem services and wildlife habitat. Creating connected woodland networks will help to reverse the habitat fragmentation caused by decades of urban and transport infrastructure development and agricultural intensification. It will also help to protect biodiversity and offer migratory routes as the climate changes.

The current extent of land covered in forests or woodland in Glasgow City Region is 17%. By 2032 the Clyde Climate Forest aims to increase forest and woodland cover by 3% (9,000 hectares - approximately 18 million trees) and thereby be in-line with the woodland expansion target in Scottish Government's Climate Change Plan. Depending on the types of trees planted these new forests and woodlands could lock up 1.5 million tonnes of CO₂ by 2045 - Scotland's target year for Net Zero. Larger scale targets similar to these could be reviewed to deliver against the CCC budgets, including consideration of land that would need to be freed up for nature-based solutions.

Further information is available in the sources below:

- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the land use, land use change and forestry sector?

As soon as possible.

3. What are the expected costs of implementing these policies in the land use, land use change and forestry sector?

While farmers will need to be supported in a transition to more sustainable agriculture, this could be supported through revisions to existing subsidies to ensure compatibility with CCC targets.

4. What are the expected benefits of these policies in the land use, land use change and forestry sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Nature-based solutions are an effective means of improving the absorption potential of greenhouse gas emissions, increasing carbon storage potential, increasing flood attenuation and improving biodiversity and nature networks.

More trees will help the Glasgow City Region adapt to increased rainfall and provide cooling during heatwaves through canopy cover. It will help create a just transition from fossil fuel reliance locking up large amounts of carbon while providing more woodland habitat for wildlife.

5. What do you think the key challenges would be in delivering these policies in the land use, land use change and forestry sector?

Creating an effective campaign on the wider-social benefits of lower emission diets. This includes reducing our contributions to antibiotic resistance, reducing the odds of new pandemics and encouraging fibre rich diets which are much more conducive to positive health outcomes, and by extension, reduced financial pressure on the NHS.

6. How could these policies support a Just Transition for workers and communities in the land use, land use change and forestry sector?

Support for farmers is paramount to achieving a just transition, as supported in the CCC's 7th Carbon Budget. Farmers and the food that they produce are essential to maintaining food security in the UK. Given the potential threats to food and agriculture, as well as the accompanying opportunities to reduce related emissions, farmers will require significant support to protect crop yield and to diversify their income streams away from livestock agriculture, with opportunities in areas such as woodland creation, peatland restoration, energy crops, and renewable energy.

Further information is available in the source below:

- Climate Change Committee (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

Agriculture

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the agriculture sector?

Key parts of the CCC's UK 7th carbon budget and Scottish Carbon Budget include a reduction in meat and dairy consumption to free up land for nature-based solutions such as woodland creation and peatland restoration. Each iteration of the UK CCC reports has made this point.

Policy should include food labelling by emission intensity to make people aware and for public bodies to provide a high quality, plant-based options in parallel with support and incentives for farmer to transition to sustainable food production.

Support for farmers is paramount to achieving a just transition. Farmers will require significant support to protect crop yield within the context of a changing climate and to diversify their income streams away from carbon-intensive agriculture, with opportunities in areas such as woodland creation, peatland restoration, energy crops, and renewable energy.

Further information is available in the sources below:

- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)
- Climate Change Committee (2025) [The Seventh Carbon Budget - CCC](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the agriculture sector?

As soon as possible.

3. What are the expected costs of implementing these policies in the agriculture sector?

While farmers will need to be supported in a transition to more sustainable agriculture, this could be supported through revisions to existing subsidies to ensure compatibility with CCC targets.

4. What are the expected benefits of these policies in in the agriculture sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

This transition would also reduce antibiotic use (and thus the odds of antibiotic resistance) and reduce the odds of new pandemics emerging / spreading. Despite this, there are very limited

details of the need for more sustainable diets as means of land-release in the Statutory Guidance.

However, there are also some notable omissions. For example, there are some significant threats to long-term sustainability, such as the emergence of pandemics and antibiotic resistance, which are exacerbated by prevalent goods and services including animal agriculture and flights. Independent research should be commissioned setting out how to reduce exacerbation of various threats to sustainability and how to exploit opportunities for greater outcomes for sustainability. This could entail tasking the CCC with shaping their carbon budgets to maximise positive impacts on the third duty and reduce Scotland's contributions to global threats to sustainability. Setting out the expected role of public bodies and accountability for specific actions to reduce threats should be incorporated into Statutory Guidance and additional detailed topic papers

5. What do you think the key challenges would be in delivering these policies in the agriculture sector?

The key challenges are the need to free up land by encouraging a movement to more sustainable and less-land intensive diets, coupled with the need to provide targeted support to farmers for a just transition.

6. How could these policies support a Just Transition for workers and communities in the agriculture sector?

Support for farmers is paramount to achieving a just transition. Given the potential threats to food and agriculture from more frequent and intensive extreme weather events, coupled with the need to reduce emission-intensive agriculture, farmers will require significant support to protect crop yield and to diversify their income streams to more sustainable opportunities in areas such as low-emission agriculture, woodland creation, peatland restoration, energy crops, and renewable energy. Providing support for land-efficient agriculture will also support food security in the UK.

Further information is available in the source below:

- Climate Change Committee (2025) [The Seventh Carbon Budget - CCC](#)

Negative emissions technologies

1. What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the negative emissions technologies sector?

As noted by the CCC "Aside from small-scale testing, there have been no engineered removals recorded to date in the UK."

By far the most effective and reliable negative emission technology is nature-based solutions. Limited public funding should prioritise scaling up proven solutions while negative emissions technologies policies should uphold the polluter pays principle. Many CO₂ removal measures and net negative emissions technologies are not yet proven at scale and have uncertain costs and large implications for energy systems. Moreover, since the CCC cite challenges with limited land availability for nature-based solutions, proven technology that has well documented wider benefits for sustainability, well-being and biodiversity should be prioritised.

The Climate Change Plan should be cautious in incorporating assumptions of negative emissions technology and prioritise policy to decarbonise the surface transport and building sectors through the transition to proven low-carbon technologies such as EVs and heat pumps and thereby lowering dependency on engineered removals.

If there are examples of CCS that are funded by private investment and can be used with a limited land footprint / storage requirement, this should be explored for existing high carbon infrastructure but not used as a justification for future high-carbon infrastructure due to the aforementioned risks and uncertainties.

Further information is available in the source below:

- CCC (2025) [Scotland's Carbon Budgets - Climate Change Committee](#)

2. When should these policies be introduced, and over what timeframe should they be implemented in the negative emissions technologies sector?

The CCC Scotland Carbon Budget balanced pathway assumes that engineered removals, such as DACCS and BECCS would start contributing to achieving net zero in 2030. However, other than small-scale testing, there have been no engineered removals recorded to date in Scotland. As such, proven solutions such as nature-based solutions to absorb greenhouse gas emissions should be the priority in policies.

3. What are the expected costs of implementing these policies in the negative emissions technologies sector?

The estimated costs of absorbing greenhouse gas emissions from the atmosphere and storing them underground or beneath the seabed indefinitely are likely to be very high compared to proven technology that already operates on scale. Negative emissions technologies policies should therefore uphold the polluter pays principle.

4. What are the expected benefits of these policies in the negative emissions technologies sector? Please include any wider benefits (e.g. environmental, equality, financial and health) you would expect.

Negative emissions technologies, despite not being proven on a scale relevant to national emissions, are often used as grounds for continued investment in fossil fuels. It is therefore possible that they have a net negative impact in environmental terms as they act as a distraction from proven solutions. Moreover, DACCS and BECCS are extremely energy and resource (land, storage, and biomass) intensive, which could potentially have a negative impact on food security and biodiversity. It is therefore key that a presumption against high carbon investment that would jeopardise Scotland's carbon budgets is established.

5. What do you think the key challenges would be in delivering these policies in the negative emissions technology sector?

BECCS is incredibly water and land-intensive and the current lack of proof of concept of it operating on a scale relevant to Scottish-wide emissions means there are doubts about its scalability.

Additionally, the CCC note that additional land needs to be freed up for nature-based solutions to meet UK Government and Scottish Government net zero targets which means that large scale bioenergy production would directly compete with nature-based solution for limited land. The

fact that there are limited examples of CCS offsetting emissions on scale that would render it relevant to overall national emissions is also an issue. More specifically, storing captured emissions underground indefinitely is likely to be land / storage and resource intensive while carrying risks regarding the credibility of storing captured emissions indefinitely.

6. How could these policies support a Just Transition for workers and communities in the negative emissions technologies sector?

To support a just transition, the deployment of negative emissions technologies must be socially equitable, and environmentally responsible. NETs should be prevented from driving squeezing out facets of the CCC's pathways which have greater societal net benefits such as nature-based solutions.

Non sector-specific questions

1. How should the changes required to meet emission reduction targets be funded?

As highlighted throughout the response, passing on the lower cost of renewably generated electricity to users should be a priority as this would be the lowest-cost means of creating financial conditions to support decarbonisation.

Other avenues include the minimum energy efficiency standards-based approach described in other sections of this report, and making spend to save infrastructure such as segregated active travel infrastructure which would reduce financial pressure on the NHS and public infrastructure.

In line with the polluter pays principle, as outlined in the Just Transition for Transport and the CCC Scotland Carbon Budget advice report, entities and organisations responsible for GHG emissions should fund the required measures to meet the emissions reductions targets. This includes moving the tax burden from renewables to fossil fuels to accelerate and incentivise electrification.

Leveraging additional private sector funding

Renewable energy investment can deliver large financial returns, since local authorities are faced with significant financial pressures, including disproportionate exposure to inflationary pressures, increased demand for key services and increasing statutory responsibilities, there simply is not an option to invest in cost-saving ideas like this in the current financial climate from local authority budgets. Current global financial volatility may compound these financial challenges and further underscore the need for additional support to be provided to public bodies for green spend to save opportunities.

Scottish Government could pioneer an evergreen investment fund which fronts the cost of these by Councils, with the fund being topped up by the savings, which could be reinvested in other green spend to save ideas. This could range from energy efficiency and renewable energy to fuel efficient driving training and smart metres.

Private funding could also be attracted to support nature-based solutions as part of an organisations' corporate social responsibility.

2. What governance arrangements are needed in the Scottish Government to ensure effective delivery of the CCP?

A presumption against high carbon investment that would jeopardise Scotland's carbon budgets has to be established and enforced if the trajectories identified by the CCC are to be delivered upon. Governance mechanisms to independently scrutinise the Scottish Government's use of spend being compatible with its statutory targets will be required. Moreover, stronger joint governance arrangements with local government are needed to ensure that climate actions are adequately funded and co-ordinated at the local level, which builds on the Climate Delivery Framework.

Targets for each of the key ministerial portfolios based upon the CCC targets including buildings, transport and nature-based solutions, will also be required.

3. How can the Scottish Government ensure transparent monitoring and reporting on progress?

An annual monitoring report should be created against all major milestones required to reach net zero: heat pumps, modal shift, EV number, nature-based solutions, net renewable energy generation across Scotland, etc.

SCIS

Public bodies across Scotland are using Scottish Climate Intelligence Service's Climate View Platform for area-wide emissions progress communication, as a dynamic modelling tool for area-wide emissions and as a way of identifying potential corrective actions for instances where public bodies are off-target. Alignment of the forthcoming Climate Change Plan with this approach, including with the common language set out through the transition elements to area-wide mitigation proposed by SCIS, presents an opportunity to encourage a coordinated approach between public bodies across Scotland. The SCIS also offers the advantage of reducing public bodies' dependence on external consultants to provide climate modelling.

Procurement

The Statutory Guidance notes that typically over 90% of an organisation's scope 3 emissions come from its supply chain, which is broadly in line with the estimated emissions for East Dunbartonshire Council's supply chain. Given the Guidance's emphasis on climate action being taken as quickly as possible and being compliant with a 1.5C scenario, including by far the largest part of public bodies' emissions in baseline reporting is crucial.

While public bodies will need extra resource and a recommended methodology to achieve significant emissions reductions from their supply chain, it is clearly crucial to maximising public bodies' impact on emissions reductions. However, this also has to be considered against other, potentially incompatible or competing procurement legislation obligations and requirements so that expectations are realistic and deliverable. There is also an opportunity for less resource intensive reporting by requiring the Scottish Government and Scotland Excel to report on national contracts and frameworks which would be more efficient than numerous public bodies reporting on their smaller share.

4. What should the Scottish Government do to help the public contribute to climate action?

Creating cost incentives

Support the removal of artificial barriers to passing on the low cost of renewably generated electricity to users, as set out in the other questions. Making low-cost transport more viable through active travel infrastructure and sustainable transport options and exploring minimum energy efficiency standards are all means of creating cost incentives to adopt net zero technology.

Introduction of RAG emissions labelling on food items

The Scottish Government should also introduce a RAG food labelling to provide information on emission intensity of food, similar to the system that operates in Denmark, to help to encourage a reduction in high-carbon foods.

Expanding network of active travel infrastructure

Expanding Scotland's network of segregated, lit and maintained active travel infrastructure and reducing the costs of sustainable travel are key enablers. The CCC estimates that over 60% of changes needed to reach net zero will require some degree of societal or behavioural change. Recommendations that the CCC make to inform and enable communities to achieving net zero include:

1. Raising awareness about climate change and providing public education campaigns and carbon literacy trainings in schools.
2. Supporting green skills and job trainings opportunities.
3. Creating enabling infrastructure, such as affordable and reliable public transport and safe cycling lanes.
4. Providing financial incentives, such as subsidies or tax incentives for EV, heat pumps installations, buildings retrofits, etc.
5. Implementing penalty schemes for high emitting activities.
6. Funding community climate projects and supporting community and youth climate hubs.

Supporting EV adoption

As outlined in the transport section, proposed solutions to making home charging more widely accessible should feature in the Climate Change Plan, such as trials of slit trenches for cables or other potentially scalable solutions to support EV adoption.

See sources below for further details:

- CCC (2025) [The Seventh Carbon Budget - Climate Change Committee](#)
- Cycling Scotland (2025) [Investment in landmark cycle routes delivering record share of journeys by bike in Scotland | Cycling Scotland](#)
- CCC (2019) [Behaviour change, public engagement and Net Zero \(Imperial College London\) - Climate Change Committee](#)

5. What other factors could affect whether Scotland meets its climate change targets?

Please share any ideas you have. These could relate to workforce planning and skills, devolved and reserved powers, social and cultural factors, international aspects, or other areas you think matter.

Investments and leveraging additional private sector funding

Strathclyde Pension Fund alone has hundreds of millions of pounds invested in fossil fuels. Achieving net zero will entail targeting areas which contribute most to emissions, so exploring ways to encourage investment in things that are conducive to decarbonisation, such as renewables instead of fossil fuel investment will be crucial. More specifically, the hundreds of millions of pounds across public pension funds in Scotland invested in fossil fuels is clearly not compatible with the Scottish Government's emphasis on 1.5°C aligned decarbonisation pathways. Scottish Government should use levers at its disposal to drive decarbonisation of investments such as the Statutory Guidance and CCP should provide details of the implications of climate change, environmental risks, divestment and potential exposure to stranded assets for pension funds' fiduciary duty to protect long-term value.

Skills

Decarbonisation has major job-creation potential and will require an increase in the supply of skills in areas including the installation and maintenance of zero emission heating systems, installations of electric vehicle charging points, increasing renewable energy generation, skills to expand the capacity of the electricity grid, and skills required to scale-up nature-based solutions. There will be opportunities for people from all walks of life whether in trades, engineering, up-skilling for skilled practitioners or opportunities for those with few or no academic qualifications.

The Climate Change Committee's advisory group also note that a successful transition to a net zero economy requires a sufficient supply of skilled green economy labour workers and estimate between 135,000 and 725,000 new green jobs could be created by 2030 in the UK in sectors such as buildings retrofit, renewable energy generation and electric vehicle manufacturing. The Scottish Government's Climate Emergency Skills Action Plan & Implementation Plan and Future Skills Action Plan outline national strategies to achieve some of this job creation potential and respective skills training. However, there are also risks for jobs in existing high-carbon sectors which mean that developing actions for green skills

We therefore see it as fundamental to encourage growth of local skills and a transition to green skills.

Potential skills shortages are anticipated in repairing and maintaining EVs and potentially electricians for charging infrastructure given the significant increase in grid capacity required to decarbonise heat and transport. The Plan should use CCC reports to estimate modal shift required to meet Scotland's net zero targets and use this information to inform skills challenges.