



## Scotland's new Climate Change Plan: an updated briefing from Stop Climate Chaos Scotland February 2025

### **Summary**

During 2025, the Scottish Government will have to publish a new Climate Change Plan (CCP). While an indicative timetable is available, **the Scottish Government should, as soon as possible, confirm and clarify the timetable for CCP publication.**

This briefing updates and builds on an SCCS [briefing](#) published in March 2024. It reflects on work carried out to date by the Scottish Government, by Environmental Standards Scotland and previous proposals from SCCS.

It seeks to set out the necessary engagement with the public and stakeholders to secure widespread support for bold and ambitious action and reiterates SCCS' tests for an adequate plan. In particular, it recommends that **every policy in the CCP should have specific, measurable outputs, expected climate outcomes and a timeframe for implementation.**

The next CCP should also:

- **Front load ambitious new policies to secure the biggest possible impact, particularly for transport, land use, heat and energy efficiency.**
- **Provide clarity on how each expected policy outcome has been calculated and which body is responsible for implementing each policy.**
- **Show how carbon budgets will be met, and how the actions proposed will result in a credible pathway to net zero by 2045. It should prioritise policies over proposals and regulation over voluntary action.**
- **Take account of the wider benefits of policies (e.g., for social justice, the economic and health), as well as detailing their climate and financial impacts.**

Public and stakeholder engagement in the development of climate policy is crucial. A real understanding of the need for action and buy-in to the policies proposed is vital – to prevent public and political resistance to the necessary changes. SCCS suggestions for enhanced engagement during the first half of 2025 include:

- An initial in person 'summit' – led/chaired by the First Minister (to stress its cross-government nature) and involving all relevant stakeholders.
- A revitalised CCP Advisory Group – with as much information shared with attendees in advance as possible, papers/analysis published, discussion topics shaped by attendees, and a clear feedback process.
- In-person, sectoral workshops involving relevant stakeholders, informed by options under consideration, and the emissions' assessments on those options.

Based on these ideas, **the Scottish Government should deliver, in the first half of 2025, a widespread and meaningful programme of engagement with the public and stakeholders to secure widespread support for bold and ambitious action.**



## **Introduction**

During 2025, the Scottish Government will publish a new Climate Change Plan (CCP). This will be followed by a period of Parliamentary scrutiny (at least 120 days) and public engagement, and recommendations and feedback from these processes will then be considered. This new plan was previously due in 2024 but has been delayed by the passing of the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024, which also amended the previous system of annual/interim target to one of 5-year carbon budgets.

While there is no definitive schedule for the setting of budgets and the publication of the draft CCP<sup>1</sup>, the Scottish Government has set out [an indicative timetable](#). This was underlined in [the Scottish Government's response to the Parliament's stage 1 report](#) on the (then) Bill, in which the Acting Cabinet Secretary said she "would seek to bring forward a draft Plan prior to Summer recess 2025". While this indicative timetable is welcome, **the Scottish Government should, as soon as possible, confirm and clarify the timetable for CCP publication**. The Climate Change Committee has since confirmed that Scotland's carbon budget advice will be published on 21st May 2025, making publishing the CCP before summer recess very challenging.

In advance of the previous deadline for a new CCP, SCCS published [a briefing](#) that set out what the CCP is, why it is important and what it should achieve. In this briefing, SCCS noted that:

*"the next CCP is really of huge significance – **it is the opportunity for the Scottish Government to reassert its climate leadership** – to set out a new framework that will meet future targets but also to demonstrate how that will happen, by clearly setting out the emissions reductions that each of its actions will deliver. The CCP must be credible – both for its own sake and the meeting of future targets, but also for the credibility of the Scottish Government. Often, the First Minister (and others) have made very welcome and positive statements about the need for action on climate change, and the CCP should turn that rhetoric into reality".*

This remains the case and, in the light of the revision to climate targets, is even more relevant.

## **Progress to date: work undertaken already**

Work to develop a new CCP has been underway for some time. SCCS has taken part in a series of meetings with relevant officials, starting in early 2022, when for instance we discussed and made a submission on [the scope of the new plan](#). Some of this proposal appears to have been accepted and SCCS has been told that the new CCP will address international climate justice and the issue of [blue carbon](#); this is welcome but remains to be confirmed. **The new CCP must be both comprehensive and bold if it is to get us on track to meeting the 2045 net zero target and new carbon budgets.**

To be comprehensive, it should set out a full account of all the Scottish Government's ambitions, policies, and position in relation to climate change (of which the formal,

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<sup>1</sup> Although the draft CCP must be published within 2 months of the regulations setting the first carbon budgets coming into effect (see s.3(1) of 2024 Act).



statutory Climate Change Plan is a significant part). To be bold, it must not shy away from new ideas or ideas that might be controversial and/or require significant Government intervention – rather, it makes the case for such action, and outline the wider societal benefits this will bring, and how it can be delivered in a way that is fair and provides appropriate support when needed.

More recently, during the summer of 2023, and as part of the Scottish Government's stakeholder engagement programme, SCCS and Scottish Environment LINK members have participated in a series of "NGO roundtables" on a range of sectors. At these roundtables, SCCS members presented policy ideas from [the SCCS Climate Manifesto](#) to feed into Scottish Government policy development. As set out in the summary of the published form of the Climate Manifesto, this is a collection of proposals that could help us get back on track to meeting our targets, and it is "a wealth of content for those revising Scotland climate plans" and we hope the new CCP will adopt many of them. During 2024, proposals in the Climate Manifesto were reviewed and updated, and SCCS has recently published a [priorities paper](#), outlining the key actions that need to be taken through the new CCP, in 2026 manifestoes, and all other opportunities.

In parallel with the above, SCCS made [a representation to Environmental Standards Scotland](#) (ESS) on the effectiveness of the previous CCP. This sought to subject the procedures for its development and adoption to scrutiny, with a view to securing recommendations that might improve the next CCP. In February 2024, ESS published its [initial findings and recommendations](#). In their summary report, ESS concludes "there is clear evidence that the CCPu failed to meet the requirements of Section 35(5) of the 2009 Act to quantify the emission reductions associated with all individual proposals and policies. ESS expects the next Climate Change Plan to address this failure, and also recommends that:

***"the next Climate Change Plan must:***

- ***set out clear timelines for individual proposals and policies***
- ***establish clear ownership and responsibility for individual proposals and policies***
- ***incorporate all the new reporting requirements introduced in the 2019 Act***
- ***address unresolved recommendations from previous parliamentary committee and CCC scrutiny of the CCPu***
- ***allow sufficient time for scrutiny of the draft and incorporate feedback before finalisation"***.

These conclusions and recommendations are extremely welcome, and the Scottish Government should follow them in preparing the next CCP.

Following the above, 18 April 2024 saw [the Scottish Government's announcement](#) in response to the Climate Change Committee's latest report, which had indicated that the 2030 interim was no longer achievable. This included the proposal to amend the target-setting framework and replace it with the 5-year carbon budgets, as now required by the Climate Change (Scotland) Act 2009, as amended by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.



Alongside the targets/budgets proposal, the 18 April announcement also included “[a new package of climate action measures](#)” that were additional to, or built on, those set out in the current CCP/CCPu. Unfortunately, [an SCCS analysis of this package](#) showed that, while well-intentioned, it was “largely re-heated measures...wholly inadequate and fall very significantly short of the transformational acceleration in action needed”. [A recent update on the delivery](#) of the 19 actions shows limited progress in some areas, but also that delivery is often slow and rather confirms SCCS’s initial assessment. **The next CCP must genuinely accelerate and embed a clear path to progress.**

In June 2024, SCCS published its “[Proposals for inclusion in 2024/25 Programme for Government](#)”. This sets out many of the steps necessary to accelerate action. While the actual [Programme for Government](#), published in September (after a delay caused by the UK general election) does make “tackling the climate emergency” one of four key priorities, and references many of the issues raised by SCCS, it still lacks key timescales and delivery. **This lack of delivery needs to be addressed by the new CCP.**

Also, in June 2024, SCCS published, jointly with [ERCS](#), a [review](#) based on our representation to ESS (see above) and two others made by ERCS. The joint briefing summarised the unresolved issues raised in the three representations and highlighted that **the new CCP was a key opportunity to embed improved monitoring, reporting, scrutiny and transparency.**

### **Data and transparency**

ESS has concluded (see above) that the current CCP/CCPu “failed to ... quantify the emission reductions associated with all individual proposals and policies”. This mirrors SCCS’s experience and frustrations with previous plans and should be addressed by the next plan. The failure to meet past annual targets, and the declared unachievability of the (former) 2030 target (leading to the revisions in the 2024 Act), were in part due to this lack of transparency – which contributed to inadequate or delayed policy action.

**While it is acknowledged and welcome that the Scottish Government has committed to improve data and transparency of the next CCP, they must deliver on the commitment.**

### **Policies and proposals**

SCCS has published a wide range of policy proposals that would, if implemented, contribute significantly to reducing Scotland’s emissions of greenhouse gases. These have all been submitted to the Scottish Government teams working (over the past 2+ years) on the (delayed) CCP. Our ideas have been set out in, for instance, [our Climate Manifesto](#), [our PfG proposals](#), and in individual sectoral policy papers, including on [oil & gas wind down](#), [heat in buildings](#), [aviation](#) and [blue carbon](#). These have now also been built on through the publication of [policy priorities](#) for the coalition, based on the emissions reductions and wider societal benefits they would likely deliver.

Nevertheless, as described above, progress on delivery has been slow and targets have been missed, resulting ultimately in the need to alter the targets framework and establish



a new system of 5-yearly budgets. Indeed, 2024 was – overall – [a year of delay and failure to deliver](#).

With the draft CCP and Heat in Buildings Bill due for publication, 2025 must – by contrast to 2024 – be a year of delivery and genuine policy acceleration. This means that ambition must be turned into bold action. SCCS recognises that such boldness might be seen as politically challenging and/or require new funds; however, there are means to address both these challenges.

First, in relation to finances, SCCS has published [a review of fiscal measures](#) that might be taken to help raise new funds for climate action and/or ways to redirect existing spend – which as well as raising resources can also encourage and support the necessary behaviour changes. This, and other work by [ClimateXchange](#) (commissioned by the Scottish Government) and by [Oxfam Scotland on aviation taxes](#), shows that the financial challenges can – with commitment – be overcome.

Secondly, the political challenges arise from the concerns of those affected by the changes that are necessary to achieve net zero. Whilst much research highlights the [widespread public support for action](#), there are understandable concerns and these should be addressed by ensuring the transition is just and highlighting and delivering the [wider societal benefits of those changes](#), including warmer/healthier homes, easier/healthier travel options; economic benefits from green jobs, and many more. These aspects need to be delivered alongside and influence the design of the sectoral policy changes and can be further enhanced by full and genuine engagement with the public and stakeholders as the proposals are developed. Such engagement should identify and address genuine concerns – while identifying and robustly resisting opposition driven by a small section of society which can afford the changes but is opposed to them.

Finally, the Scottish Government and the draft CCP needs to take into account (and promote appropriate changes to policy) reserved matters that are the responsibility of the UK Government. Close working with the UK Government is, therefore, important – and the initial indications from the new UK Government suggest that positive collaboration towards an agreed net zero objective should be possible. SCCS outlined thoughts on UK/reserved policy issues in [a briefing for the 2024 UK general election](#). **The CCP should set out what proportion of each five year carbon budget is linked to UK/reserved policies, and what steps the UK Government should take to ensure that this fraction is reduced in accordance with the budgets adopted.**

### **Public and stakeholder engagement**

Public and stakeholder engagement in the development of climate policy is crucial. It is good practice in all policy development; however, the CCP will address all aspects of government policy, leading to significant changes to the lives of everyone and every business, in Scotland. Therefore, a real understanding of the need for action and buy-in to the policies proposed is vital – to prevent public and political resistance to the necessary changes.



To secure this buy-in, it is important that the wider societal benefits of climate action are highlighted and that the policies are designed and implemented in a manner that is fair (that is, provides support for those unable to fund changes themselves and is funded by those most responsible for emissions and most able to pay, and are designed in a way that delivers wider societal benefits).

As set out above, during 2022 and 2023, Scottish Government officials working on the CCP, to the timetable at that time which envisaged publication during 2024, met with members of SCCS and LINK to explore and discuss policies and proposals suggested by eNGOs. No doubt, similar discussions took place with other stakeholders. Nevertheless, there is no publicly available information related to the outcomes of these discussions – or any form of ‘pre-draft’ of the CCP that might give stakeholders an understanding of progress to date in developing plans. All that is available is existing policies (that is the current CCP/CCPu), and proposals set out in consultations such as on the draft ESJTP, draft 20% car-km reduction plan, draft Heat in Buildings proposals, etc (all of which have been [subject to significant delays](#)), and the 18 April 2024 policy package (see above).

This lack of transparency and 2-way dialogue in relation to the developing ideas for a future CCP was something that concerned the NZET Committee during their consideration of the recent target legislation. Indeed, the Committee recommended that *“the Scottish Government [ ] consider laying a draft of the plan at the same time as it lays regulations setting out carbon budget targets, rather than laying the regulations first and the draft plan only after they are agreed. This would allow Parliament, and wider stakeholders, the opportunity to consider the proposed target in the context of the draft plan, and vice versa”*. While the Scottish Government has not accepted this recommendation in its entirety, it is welcome that they have recognised the benefits of greater openness in relation to developing thinking and [the Acting Cabinet Secretary has indicated](#) that she *“will consider this recommendation further and work with the Committee to identify what information it may be possible to share prior to laying the draft version of our statutory CCP in Parliament and in what format it would be most useful to share it”*.

There remains, therefore, a need for real engagement during the first half of 2025 as the draft of the new CCP is developed, including openness/publication of options under consideration, and the emissions’ assessments on those options. SCCS looks forward to taking part in such engagement and hopes that it develops into a well-informed multilateral dialogue. Some ideas that might contribute to the establishment of such a dialogue include:

- An initial in person ‘summit’ – led/chaired by the First Minister (to stress its cross-government nature) and involving all relevant stakeholders.
- A revitalised CCP Advisory Group – with as much information shared with attendees in advance as possible, papers/analysis published, discussion topics shaped by attendees, and a clear feedback process.
- In-person, 2 hour/half day sectoral workshops involving relevant stakeholders and experts, informed by options under consideration, and the emissions assessments on those options, to work through the challenges and ideas. To get the most out of the



time, information and proposals could be shared in advance, and follow up email discussions to take place. Careful consideration should be given to facilitation and the agenda to ensure these are as productive as possible; including how the workshops' conclusions are reported to the Advisory Group and thence to Ministers.

The development of the new CCP must also take full account of past public engagement exercises. In particular, the work and recommendations of the Citizens' Assembly<sup>2</sup> and the [NZET Committee's People's Panel](#). These exercises, as well as [public opinion research](#), demonstrate considerable public support for bold but fair climate action. Not delivering on such recommendations risks undermining this support.

After publication and laying of draft, consultation and evidence gathering will be led by the Parliament, presumably the NZET Committee, but with other committees providing scrutiny of sections relevant to their remit and feeding into overall response. These committees should, as they did in 2020 with the CCPu, seek the views of all stakeholders.

### **How will SCCS judge its content?**

SCCS' assessment (and any recommendations we make for its improvement) will take two forms:

1. An overall assessment of its ambition and credibility – using the MATCH criteria (see box); and
2. An assessment of individual policies, sector by sector, based on a comparison with the relevant policy proposals set out in [SCCS' Climate Manifesto](#), as recently updated, and [policy priorities](#).

#### **The MATCH criteria**

In order for Scotland to meet its climate ambitions and to realise the benefits of a low carbon transition, we believe that the Scottish Government's new Climate Action Plan must MATCH all of the following criteria:

- **Measurable**

Every policy in the CCP should have specific, measurable outputs, expected climate outcomes and a timeframe for implementation.

- **Ambitious**

The CCP should front load ambitious new policies to secure the biggest possible impact, particularly for transport, land use, heat and energy efficiency.

- **Transparent**

The CCP should provide clarity on how each expected policy outcome has been calculated and which body is responsible for implementing each policy.

<sup>2</sup> While [a research report](#) into Scotland's Climate Assembly, including process, impact and assembly member experience, is available, as is [the Scottish Government response](#), the actual assembly's website is no longer online.



- **Credible**

The CCP must show how carbon budgets will be met, and how the actions proposed will result in a credible pathway to net zero by 2025. It should prioritise policies over proposals and regulation over voluntary action.

- **Holistic**

The CCP should take account of the wider benefits of policies (e.g., social, economic and health), as well as detailing their climate and financial impacts.

If, in the view of experts, it is substandard and/or appears not to meet the requirements of the 2009 Act, as amended, in setting out a route to meet the 2045 net zero target or the 5 year carbon budgets en route to 2045, SCCS and its members will need to consider what, if any, further action needs to be taken.

### **Conclusion**

The Scottish Government should, as soon as possible, confirm and clarify the timetable for CCP publication. This must include details of planned scrutiny and public engagement: such engagement is vital to secure widespread understanding, buy-in and support. SCCS proposes that the Scottish Government commit to, and deliver, an enhanced programme of engagement, during the first half of 2025.

Every policy in the CCP should have specific, measurable outputs, expected climate outcomes and a timeframe for implementation. It should also:

- front load ambitious new policies to secure the biggest possible impact, particularly for transport, land use, heat and energy efficiency.
- provide clarity on how each expected policy outcome has been calculated and which body is responsible for implementing each policy.
- show how carbon budgets will be met, and how the actions proposed will result in a credible pathway to net zero by 2025. It should prioritise policies over proposals and regulation over voluntary action.
- take account of the wider benefits of policies (e.g., social, economic and health), as well as detailing their climate and financial impacts.

The UK and Scottish Governments must collaborate closely to ensure that devolved and reserved policies operate to complement each other, and that emissions attributable to each are reduced. The CCP should set out what proportion of each five year carbon budget is linked to UK/reserved policies, and what steps the UK Government should take to ensure that this fraction is reduced in accordance with the budgets adopted.

The Scottish Parliament and all relevant stakeholders should prepare to participate fully in the scrutiny and engagement process – with a view to working to ensure that the new CCP, when adopted, ushers in an ambitious step change in actions to deliver fast and fair emissions reductions and ensures Scotland is “on track” to meet the legally-binding targets/budgets.