Quakers in Scotland response to CCP 2025 Scrutiny Call for Views

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Sector: Buildings

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

The Climate Change Committee (CCC) identified heat in buildings reform as key to achieving the necessary emissions reductions in Scotland by 2045. The most critical policy framework therefore remains the implementation of comprehensive Heat in Buildings legislation. Despite recent weakening of proposals, we maintain that mandatory standards (not mere targets) are essential for providing industry certainty and driving systematic decarbonisation. The original iteration of the Heat in Buildings Bill was recognised by the CCC in its 2023 report to the Scottish Parliament as an "early sign of good progress" that "must be delivered promptly and effectively to ensure Scotland can get as close as possible to meeting its targets." It was also regarded by the CCC as a possible model for the UK as a whole. It is important that this level of ambition is reflected in updated legislation and in delivery of it.

If the main mandatory features and timetable of the original HiB proposals are removed, new proposals must specify how the public will be incentivised and enabled to make the switch to clean heating in time to meet the CCC's balanced pathway for carbon emissions reductions.

Key policy components must include:

- Prohibiting polluting heating systems by 2045, with clear interim milestones to allow industry and the population to plan and invest accordingly

- A clear signal to industry and the public that hydrogen is not a feasible alternative to our current gas heating system (in line with CCC advice), and would be more expensive for consumers in the long-term

- Compulsory timescales for compliance with heating system upgrades to clean heating systems

- Support for energy efficiency measures including comprehensive insulation, upgraded windows, and domestic renewable energy generation such as solar PV and small-scale wind

- Mandatory connection to heat networks where established, with powers for local authorities to designate Heat Network Zones

- Comprehensive workforce retraining programmes for existing heating engineers and tradespeople

- Progressive energy efficiency standards that tighten over time

- Targeted support for properties which are difficult to make efficient and/or to incorporate clean heating elements.

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

Under the CCC's Balanced Pathway (May 2025: Scotland's Carbon Budgets – CCC advice to the Scottish Government), domestic buildings are the source of 10% of proposed carbon emission reductions in the 2026-30 period and 20% in each of the following two budget periods out to 2040, this sector can be a significant source of emission reduction from early in the first budget period. To achieve this decarbonisation of domestic heating on that timescale requires an immediate start in terms of putting the legislation and funding support in place which will galvanise industry and the public to deliver the necessary cuts. The industry needs to be developed quickly to deliver the technological change to meet the Balanced Pathway. (Note: the CCP should explain any significant variances from the CCC's Balanced Pathway to enable understanding of the choices it has made.)

The sooner the policies can be introduced, the better industry and the public will be able to plan and invest accordingly. Interim solutions can and should be put in place, such as the ability to rent a boiler if your home is part of a street which is intended to be part of a District Heat Network in the coming years, to avoid homeowners upgrading a boiler only to find that it needs to be replaced before the end of its lifespan.

There should therefore be immediate legislative enactment of strengthened Heat in Buildings Bill provisions, together with the launch of a comprehensive public education campaign explaining the benefits and requirements, and the establishment of better training infrastructure and workforce development programmes. In accordance with CCC recommendations, we should aim for 40% of Scotland's homes to have low carbon heat, with 23% of Scottish homes running a heat pump, by 2030.

In the following years (e.g. by 2033) the efficiency standards for rental sector and owner-occupied properties should be made mandatory, together with compulsory timescales for compliance with heating system upgrades. The effectiveness of these measures can be measured by the annual number of heat pump installations and number of properties covered by district heat networks.

By the end of 2040, fossil fuel heating should be phased out except in exceptional circumstances, and there should be over 80% clean heating adoption across residential and commercial factors.

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.

EQUALITY AND ECONOMIC: We need a ‘polluter pays’ principle to be built into a transparent system of financial support to support lower income households within the transition. With this in place, improved efficiency and stable renewable energy costs can genuinely reduce fuel poverty, addressing linked economic and equity issues. There are also big opportunities in creating green jobs in installation, manufacturing, and maintenance.

HEALTH: Warmer, more comfortable homes will support physical and mental health, and productivity. There will be improved indoor air quality reducing respiratory illness. There will be reduced health service costs from damp- and cold-related illness.

What do you think the key challenges would be in delivering these policies in the Buildings sector?

MANUFACTURING AND TRAINING: Supply chains are a key consideration. Funders such as Scottish Enterprise should support Scotland’s industry to meet our production needs to make our building stock more sustainable. In relation to skills, consideration should be given to how Skills Development Scotland can provide support to training institutions to provide the skills that we will need, for example by supporting apprenticeships.

PUBLIC SUPPORT: It is important that these policies are implemented in a transparently fair and just manner, and accompanied by information and support for the public. Households in poverty will need targeted support to be able to benefit from the future savings brought by insulated, easy-to-heat properties.

COMPLEX PROPERTIES: Not all properties are suitable for individual heat pumps, and particular consideration should be given to the best way of retrofitting existing housing stock, for example tenement properties. This should be financed on a ‘polluter pays’ principle, i.e. using fiscal tools to raise funds from polluting industries and practices, and the wealthier in society.

UPGRADING ELECTRICITY GRID: The increased use of electricity to heat homes will contribute to accelerating electricity demand. It is critical that the electricity grid is properly maintained and updated to be able to cope with these, and the CCP should set out a route for collaborating with the UK government on UK grid upgrades which are subject to reserved decisions.

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

These policies will provide critical sustainable jobs if implemented correctly, allowing our existing pool of experienced gas heating engineers to retrain as heat pump specialists. Their retraining needs, together with the training needs of new workers via apprenticeship routes, must be at the heart of buildings policy-making.

Sector: Transport

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

It is important to implement robust ‘polluter pays' mechanisms that ensure those generating the highest transport emissions bear proportionate responsibility for climate action costs. This includes supporting progressive taxation measures such as the Oxfam campaign for a private jet tax, which addresses the stark inequality where the wealthiest 1% of global travellers generate more emissions than the poorest 50% combined. Such mechanisms would create essential revenue streams for sustainable transport infrastructure while establishing clear market signals that incentivise behavioural change across all income levels.

Equally vital is prioritising substantial investment in integrated public transport networks and active travel infrastructure. The evidence demonstrates that transport currently accounts for around 33% of Scotland's greenhouse gas emissions (https://www.parliament.scot/-/media/files/committees/net-zero-energy-and-transport-committee/correspondence/2025/june-2025/letter-from-cabinet-secretary-for-transport-regarding-achieving-car-use-reduction-in-scotland-12-jun.pdf) , accompanied by harmful nitrogen oxides, sulphur compounds, and fine particulate matter that directly damage respiratory health and disproportionately affect economically disadvantaged communities. The further rolling-out of ultra low-emission zones in cities and towns needs to be part of the CCP and is clearly linked to health as well as transport policy. Comprehensive policy must therefore simultaneously address climate targets and health equity through accessible, efficient, and reliable public transport systems that reduce both emissions and air pollution exposure.

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

Even more than the Buildings sector, the Transport sector is critical for achieving the emission cuts proposed by the CCC’s Balanced Pathway for the first two budget periods out to 2035. Under the Balanced Pathway this sector needs to achieve 20% of the reductions of the 2026 to 2030 period and 30% of the 2031 to 2035 emission reductions. Policies must be confirmed and acted upon as soon as possible in 2025.

‘Polluter pays’ mechanisms, including aviation taxation, should be introduced within the 2025-2026 parliamentary session to establish immediate revenue generation for subsequent infrastructure investments. This urgent timeline reflects both the climate emergency's scale and the documented health impacts of transport emissions, which cause preventable respiratory disease and premature mortality today.

Public transport and active travel infrastructure development requires a long-term commitment with measurable milestones. Early implementation phases should prioritise communities experiencing the highest levels of transport-related air pollution, addressing both climate and health justice simultaneously.

What are the expected costs of implementing these policies in the Transport sector?

While initial capital investments will be substantial, the economic framework must recognise transport transformation as investment rather than cost. 'Polluter pays' mechanisms would generate dedicated revenue streams that partially offset public expenditure while ensuring those with highest emissions contribute proportionately. Revenue from progressive aviation taxation alone could fund significant public transport improvements while maintaining broad public support for climate action.

Any comprehensive cost analysis must include current economic costs from transport-related health impacts, including NHS treatment costs for respiratory diseases, lost productivity from poor air quality, and reduced quality of life in communities with significant air pollution. Research consistently demonstrates that investment in public transport and active travel infrastructure generates positive economic returns through reduced healthcare costs, improved productivity, and enhanced property values in well-connected areas (e.g. https://www.sciencedirect.com/science/article/pii/S221414052500009X). These policies represent essential infrastructure investment that supports long-term economic competitiveness while addressing climate commitments.

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.

HEALTH Enhanced public transport and active travel infrastructure directly reduces air pollution exposure, reducing respiratory disease and cardiovascular conditions that disproportionately affect children and economically disadvantaged communities. Policies benefiting climate also enhance citizen wellbeing through cleaner air, increased physical activity, and reduced transport costs. For example, see Impacts of active travel interventions on travel behaviour and health: Results from a five-year longitudinal travel survey in Outer London. Aldred R, Goodman A, Woodcock J (2024), The CCP needs to demonstrate intention to further roll out ULEZs for health reasons, accompanied by public information campaigns about the benefits of these.

EQUALITY: Social equity benefits include improved access to employment, education, and services for communities currently underserved by transport infrastructure. Active travel promotion addresses multiple health challenges simultaneously, combating sedentary lifestyles while reducing emissions. Furthermore, reduced dependence on private vehicle ownership particularly benefits lower-income households, who spend disproportionate percentages of income on transport. These policies therefore advance both climate goals and social justice principles that align with Scotland's commitment to reducing inequality.

What do you think the key challenges would be in delivering these policies in the Transport sector?

Primary challenges include overcoming entrenched car-dependency culture and visibly addressing legitimate rural transport needs where public transport provision faces geographic and economic constraints. Political resistance to taxation measures requires

careful communication emphasising health benefits and social equity rather than punitive approaches. There will need to be clear communication about long-term benefits and interim support measures to help manage any temporary inconvenience through a transition period to develop infrastructure.

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

Investment in green transport infrastructure creates substantial employment opportunities in construction, engineering, and ongoing maintenance that can absorb displaced workers while providing secure, well-paid employment.

Community-centred approaches should prioritise transport improvements in areas experiencing highest levels of deprivation and air pollution, ensuring climate action advances rather than undermines social equity. The evidence from eco-anxiety research demonstrates that community-based action builds resilience and hope, suggesting that involving communities in transport transformation planning enhances both policy effectiveness and social cohesion. For example, see British Medical Journal: Balancing climate anxiety with hope: learning from collective climate activism. Powell, R.A., and Rao, M. (2023)

Sector: Land use, land use change and forestry

What are the most important policies needed to achieve the proposed carbon budgets level for 2026-40 in the Land/Forestry sector?

It is important that recent Land Reform policies be improved and implemented. The obligation to have a land management plan should be imposed on all landowners receiving public subsidies or tax relief, not merely those holding large estates. These comprehensive land management plans must be legally binding, publicly accessible through a central database, and explicitly detail ecosystem restoration activities, carbon sequestration measures, and biodiversity enhancement strategies.

Equally essential is the reform of Scotland's land taxation system and inheritance laws to incentivise responsible stewardship and discourage speculative ownership that prioritises short-term financial returns over long-term environmental sustainability. A land value tax specifically earmarked for environmental restoration and community land acquisition would create powerful market incentives for sustainable land management while generating revenue for climate initiatives.

When should these policies be introduced, and over what timeframe should they be implemented in the Land/Forestry sector?

Mandatory land management plans should be introduced within the next parliamentary session, with full implementation achieved by 2027. This timeline allows for adequate consultation with landowners and communities while ensuring meaningful climate action within the critical 2026-2030 carbon budget period.

Land taxation reforms require more extensive preparation and should be introduced progressively, which could mean starting with pilot programs in 2026 and achieving full implementation by 2030. Early implementation should prioritise areas with the highest potential for carbon sequestration and biodiversity restoration, while providing comprehensive support and training for landowners and communities to ensure successful compliance.

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

ENVIRONMENTAL - The environmental benefits extend far beyond carbon sequestration to encompass comprehensive ecosystem restoration, enhanced biodiversity, improved water quality, and increased resilience to climate impacts. These policies would position Scotland as a global leader in sustainable land management, creating significant opportunities for knowledge export and international collaboration.

EQUALITY and HEALTH - Socially, these reforms would strengthen equitable community ownership and democratic participation in land stewardship, addressing centuries of concentrated private control over Scotland's natural heritage. Enhanced community engagement requirements would foster deeper connections between people and place, supporting mental health and social cohesion while empowering local decision-making.

ECONOMIC - Economically, the policies would stimulate rural employment in conservation, forestry, and sustainable agriculture while reducing public subsidy dependency on environmentally harmful practices. Ensuring there are clear rules around domestic nature-based carbon sequestration schemes would reduce reliance on questionable international offset schemes while building genuine economic value from environmental stewardship.

What do you think the key challenges would be in delivering these policies in the Land/Forestry sector?

The primary challenge lies in overcoming entrenched resistance from large landowners who have historically operated with minimal public accountability despite receiving substantial public subsidies. This resistance will likely manifest through legal challenges, lobbying efforts, and claims of disproportionate regulatory burden. However, these concerns must be balanced against the moral imperative of environmental stewardship and the legitimate public interest in ensuring that public funds support genuine climate action.

Practical implementation challenges include developing robust monitoring and enforcement mechanisms, providing adequate support for smaller landowners, and ensuring that community engagement processes are meaningful rather than tokenistic.

How could these policies support a Just Transition for workers and communities in the Land/Forestry sector?

A genuinely just transition must prioritise community ownership and democratic participation in land management decisions, moving beyond consultation toward meaningful power-sharing arrangements. Enhanced community land ownership, supported by revenues from land value taxation, would provide local communities with direct economic benefits from environmental stewardship rather than remaining dependent on private landowner decisions.

Investment in training and education programs would equip rural workers with skills for emerging green economy opportunities in conservation, renewable energy, and sustainable agriculture. Community-controlled land management creates opportunities for diverse local enterprises while ensuring that economic benefits remain within communities rather than flowing to distant shareholders.

The transition must also address historical injustices in land ownership, recognising that many communities have been dispossessed of their traditional lands through centuries of enclosure and privatisation. A citizens' assembly process could explore mechanisms for returning appropriate lands to community ownership without perpetuating the wealth inequalities that have characterised Scotland's land ownership patterns.

Critically, a just transition requires moving beyond market-based solutions that maintain existing power imbalances toward systemic reforms that redistribute both land ownership and decision-making authority. This includes supporting community organisations through

enhanced funding for Community Land Scotland and similar bodies, ensuring that communities have the resources and expertise needed to become effective land stewards and environmental guardians.

Sector: Negative Emissions Technologies

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

The Intergovernmental Panel on Climate Change ranked CCUS among the least effective and most expensive ways to meet 2030 climate targets, with research by the Institute for Energy Economics and Financial Analysis showing no CCUS project worldwide has achieved more than 80% capture rates (https://ieefa.org/ccs).

The most important policy approach for the NETS sector must begin with rigorous truth-telling about the limitations and risks of negative emissions technologies. Rather than relying heavily on unproven and expensive technologies such as Carbon Capture, Utilisation and Storage (CCUS), policies should prioritise proven, scalable emissions reduction measures.

Although the CCC have stated that we now cannot achieve our carbon reduction commitments without CCUS, they have also criticised Scottish climate policy to date for being over-reliant on hopes about CCUS. The new CCP must not fall into this trap.

To the extent that NETS are explored, there should be mandatory transparency requirements for all NETS projects, including full disclosure of capture rates, energy consumption, and lifecycle emissions. Policies must establish minimum performance standards and require regular independent monitoring and reporting.

Preference should be given to policies that prioritise nature-based solutions such as peatland restoration, afforestation with native species, and regenerative agriculture practices, which offer proven carbon sequestration alongside biodiversity and ecosystem benefits. Any policy framework should also ensure that NETS deployment does not become a substitute for the urgent emissions reductions needed across all sectors of the economy.

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

The urgency of the climate crisis means that we cannot afford to invest heavily in technologies that may prove ineffective or counterproductive.

Under the CCC's Balanced Pathway, Engineered Removals (i.e. NETS) do not become significant until the 2036 to 2040 and 2041 to 2045 budget periods being between 10% and 15% of the emission reductions of those two periods. The industry is in its infancy and unproven in viability at the scale envisaged by 2045. A dilemma arises: how much of a finite financial budget for climate work be allocated to NETS now to give it a chance to prove its viability by 2036 when it is needed? We believe strongly that current available funds should be allocated to climate policies which we know will deliver emission reductions in, for example, the Buildings (domestic heating) and Transport sectors which need to be delivering emission reductions from 2026 onwards. If NETS development is favoured over these two sectors and emission reductions are delayed, then Government is choosing to risk intensifying the climate crisis.

Nature-based negative emissions policies should be accelerated within the next 12-18 months, as these approaches can begin delivering benefits relatively quickly while supporting biodiversity and rural communities. For technological approaches like CCUS, policies should include mandatory pilot phases with rigorous evaluation criteria before any scaling up occurs.

Given the timeline to 2030 climate targets, policies must recognise that over-optimistic reliance on future NETS capacity cannot excuse delays in implementing proven emissions reduction measures across transport, buildings, and industry. The policy framework should explicitly prevent NETS from becoming a justification for delaying essential decarbonisation efforts.

What are the expected costs of implementing these policies in the NETS sector?

The high cost of technological approaches like CCUS - identified by the IPCC as among the most expensive climate solutions - must be weighed against the proven effectiveness and lower costs of emissions reduction measures and nature-based solutions.

Public funding for NETS should be subject to rigorous cost-effectiveness analysis compared to alternative climate investments. Any public funding should fully assess the carbon impact of any project receiving public funding, including Scope 3 emissions. This approach would ensure that NETS investments deliver genuine value rather than creating expensive infrastructure with limited climate benefits.

The costs of transparency and monitoring policies, while requiring upfront investment, would prevent the far greater costs of ineffective projects and stranded assets. We believe the opportunity cost of misdirecting climate investment toward unproven technologies could significantly undermine Scotland's ability to meet its climate commitments.

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

The primary benefit of evidence-based NETS policies would be to ensure that Scotland's climate investments deliver genuine emissions reductions rather than creating false confidence in unproven technologies. Prioritising nature-based solutions would provide multiple co-benefits including enhanced biodiversity, improved water quality, flood management, and rural employment opportunities.

However, we caution against overstating the benefits of technological NETS. The environmental benefits of CCUS remain uncertain, and the technology carries risks including potential CO2 leakage, high energy consumption, and the perpetuation of fossil fuel infrastructure. Health benefits from reduced air pollution would be better achieved through direct emissions reduction rather than end-of-pipe capture technologies.

What do you think the key challenges would be in delivering these policies in the NETS sector?

There is a serious long-term challenge: the need to maintain a currently unproven process indefinitely, to protect the climate from continuing carbon emissions that have not been or cannot be abated.

The greatest challenge lies in overcoming technological optimism and vested interests that promote unproven solutions over demonstrated alternatives. Political and industry pressure to invest in high-profile technological projects may conflict with evidence-based policy making.

Technical challenges include the lack of proven, large-scale CCUS projects and uncertainty about long-term storage security. Economic challenges centre on the high costs and uncertain returns of technological approaches compared to proven alternatives.

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

From an equality perspective, NETS policies must ensure that climate investments serve Just Transition principles: they should not subsidise (directly or via fiscal loopholes) industries that have contributed disproportionately to the climate crisis while potentially burdening future generations with monitoring and maintenance costs.

Just Transition principles should guide NETS policy development to ensure that climate investments create meaningful, sustainable employment rather than short-term projects dependent on ongoing subsidies. Nature-based NETS approaches offer particular opportunities for rural communities through peatland restoration, sustainable forestry, and regenerative agriculture initiatives.

Rather than perpetuating dependence on fossil fuel industries through CCUS investments, policies should support workforce retraining for proven renewable energy and energy efficiency sectors. This approach would create more secure, long-term employment while delivering genuine climate benefits.

Non-Sector Specific Questions

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

Quakers in Scotland believe that climate action funding must be grounded in principles of justice and equity, ensuring that those who have contributed most to the climate crisis bear proportionate responsibility for the costs of transition: the 'make polluters pay' principle.

We advocate for establishing comprehensive fundraising mechanisms that include windfall taxes on excess profits from high-carbon industries and air departure / luxury transport taxes that reflect the true environmental cost of aviation. These measures would ensure that individuals and business responsible for over-consumption and high-carbon pollution bear fair financial responsibility for the climate loss and damage they cause.

Public funding criteria should be fundamentally reformed to fully assess the carbon impact of any project receiving government support, including Scope 3 emissions. This approach would ensure that public money catalyses meaningful structural changes toward sustainability rather than inadvertently supporting high-carbon activities. All funding given through agencies like Scottish Enterprise and the Scottish Investment Bank should be contingent on stimulating a sustainable economy, strongly prioritising projects and processes that cut carbon emissions while freeing up resources to invest in renewable

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

The Scottish Government must prioritise comprehensive public education and transparency. This should headline the fact that the climate emergency is already underway, and that it is man-made, as is the related crisis in biodiversity and the balance of nature. The CCP should be upfront on this, as it is increasingly vital to counter populist scepticism and denial.

This should include nationwide, meaningful, face-to-face public meetings, to build genuine public support for climate action. Online-only information, and even localised climate hub activity, is likely to remain siloed and to reach only small numbers of self-selected groups. A nationwide approach could be hugely positive, allowing local success stories to be shared across and between places.

Anecdotally, we meet people in our towns who are still asking whether the climate crisis is serious. Recent polls have revealed that although a majority of people are seriously concerned about the climate crisis, only one in ten of those talks openly about it. It has quietly become a self-imposed taboo. A public engagement programme face to face would help open up discussion and understanding. This is essential if citizens are going to understand and accept the need for change in our lives brought by the need for emissions reduction and elimination.

A comprehensive public campaign should explain directly to the Scottish public how mitigation steps will reduce emissions to slow climate breakdown and how adaptation measures will help us cope with the climate changes already underway. This campaign must be grounded in truthfulness and honesty about both the opportunities and challenges ahead, including honest assessment of the limitations of unproven technologies such as CCUS.

The government should communicate both the economic benefits and return on investment in climate resilience, as well as the far greater costs of inaction – at both an individual and national level. This includes highlighting opportunities for jobs in new technologies, manufacturing opportunities, and improved health outcomes from climate-friendly pollution reduction and active travel policies. By clearly explaining policy choices and their necessary compromises, the government can lay groundwork for an optimistic and credible vision that restores confidence and hope in a more equitable and safer future.

Practical support for public participation requires maintaining ambition in legislation like the Heat in Buildings Bill, with clear timescales that allow industry to plan and invest accordingly while providing comprehensive workforce training and support for existing workers. The government should prioritise proven, scalable solutions over expensive and unproven technologies.