Scottish Environment LINK

SCOTTISH GOVERNMENT ENERGY STRATEGY AND JUST TRANSITION PLAN

CONSULTATION RESPONSE

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Marine, Planning, and Sustainable Economy Groups.

LINK members welcome the opportunity to respond to the draft Energy Strategy and Just Transition Plan. This response is supported by the LINK members listed at the end of this document. Individual members are also submitting their own responses in which more detail can be found.

Response

LINK members welcome this Energy Strategy and Just Transition Plan as a step towards outlining how Scotland is going to meet its energy needs and the needs of workers involved in the energy sector. However, for it to be a convincing strategy, it lacks analysis and it falls short in laying out concrete objectives and how they are going to be met, given a range of constraints. Our response is based around the main points we would like to make and where content is relevant to a specific question in the consultation, we have noted the question in blue.

LINK members have comments in the following areas:

- **It is not a comprehensive strategy**
- **The necessity of demand reduction**
- **Nature, landscapes and seascapes need to be considered at a strategic level**
- **Attention to materials and circular economy approaches need to be embedded**
- **Economic and social benefits**
- **Supply, technologies and storage**
- **Outcomes**

1. It is not a comprehensive strategy

The strategy includes a vision which is aspirational and vague, but no concrete goals or objectives nor associated convincing route plans. From the lists of actions in various places, it is impossible to tell what each action will contribute / what they will add up to. Many are continuations of or build on existing initiatives and there is little analysis of what previous initiatives have achieved. **The ESJTP needs concrete objectives and route maps with aligned investment which set out how objectives are to be met.**

There are various statements about the amount of energy that will be generated as a proportion of electricity demand and/or total energy demand; and the extent to which sectors will be decarbonised by certain dates. These statements, taken together, are somewhat confusing. **The balance of supply and demand (electricity and all energy) from renewable and non-renewable sources over time needs to be laid out in a clear way.** The ESJTP considers supply for Scottish demand and what can be produced for export, which also needs to be clearly shown.

It would be useful to have **a diagram showing the links between the ESJTP and other strategies / policy documents and what direction / policy is set by each and how they relate to each other.**

There is little acknowledgment or analysis of the constraints or obstacles to achieving the vision set out, including physical, behavioural or financial. The document feels very aspirational, relying on voluntary uptake of various funds and schemes, but no acknowledgment of the limitations of public funding or strategy for addressing such limitations. For example, the £1.8 b for energy efficiency equates to less than £700 per dwelling; although the Strategy does refer to the forthcoming Heat in Buildings bill which will regulate energy efficiency and zero emissions from buildings and we hope this will bring forward the step change needed in terms of energy efficiency in buildings.

(Consultation question 1. What are your views on the vision set out for 2030 and 2045? Are there any changes you think should be made?)

LINK members welcome the vision set out and the inclusion of wider environmental ambitions but would like to see greater commitment to nature, an explicit link to net-zero and a focus on reducing energy demand included. The vision could be written as (new content in bold):

*by 2045 Scotland will have a flourishing, **nature and** climate friendly, energy system that delivers affordable, resilient and clean energy supplies for Scotland's households, communities and business; **and enables Scotland to reach its net-zero goal**. This will deliver maximum benefit for Scotland, enabling us to achieve our wider climate and environmental ambitions, drive the development of a wellbeing economy and deliver a just transition for our workers, businesses, communities and regions. **Energy demand will be reduced through energy efficiency and other measures that focus on optimization of materials and circular economy approaches.***

2. The necessity of energy demand reduction

LINK members would like to see reducing demand for energy given more emphasis. Lowering energy demand across our services, economy and households, reduces the energy generation and network infrastructure needed, in turn reducing associated habitat disturbance, demand for raw materials, carbon emissions and landscape impacts.

'*Without substantial reductions in energy demand, meeting climate targets becomes extremely expensive due to the substantial increases in the size of the energy system and the installation of expensive Carbon Dioxide Removal (CDR) technologies. Energy demand reduction is a significant enabler of a cost effective, timely and de-risked net-zero target*'. ……. *'The UK could more than halve its energy demand by 2050, making a substantial contribution to global and UK climate goals. Existing policy instruments would only reduce energy demand by 5% by 2050'*.[1]

Reduced demand can be achieved by increasing energy efficiency, more innovative uses of materials, increased reuse and recycling, new design requirements and standards, strategic public investment into industries that demonstrate energy efficiency, and smarter ways to optimise resources.

Although demand reduction is included in the draft ESJTP, it is not given due emphasis nor factored into the forecasts. (We do acknowledge the forecast for transport includes the policy to reduce car miles by 20%, and welcome this, but this is only one area of demand reduction). **Demand reduction measures should form a key part of the ESJTP, or if dealt with in other strategies, they need to be cross referenced and linked to the ESJP. There needs to be a specific objective(s) relating to reduced demand and associated measures spelled out.** The challenge is systemic in nature and needs government leadership and a coordinated approach '*The response to reducing our energy demand does not mean a collection of energy policies alone but aligned policies in all areas*'[2].

This approach needs to be coordinated across UK nations, with demand in all parts of the UK and across all sectors being of relevance to Scotland's supply of energy and, therefore, this Strategy. The energy sector itself needs to be scrutinised with new infrastructure assessed on a lifecycle carbon analysis to determine energy demands during construction, use and end of life.

There needs to be recognition that many demand reduction initiatives have failed to reach targets, and new approaches are needed to incentivise and/or require organisations and individuals to undertake measures and change behaviour.

(Heat in Buildings q 27.What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?)

(Energy for transport - q28.What changes to the energy system, if any, will be required to decarbonise transport?)

In addition to the points noted in the consultation, LINK members would like to see the following included in the ESJTP:

- Incentives to encourage wider use of public transport, building on the free bus travel for under 22s. Various cities in France, Estonia and Belgium as well as whole nations - Luxembourg and Malta - offer free public transport to everyone to address climate change and congestion[3] .
- Alignment with NPF4 and planning focus on 20 minute neighbourhoods, and other place based emphases that reduce the need for travel, especially by private car.

[1] https://www.creds.ac.uk/publications/the-role-of-energy-demand-reduction-in-achieving-net-zero-in-the-uk/ UK, 2021
[2] https://www.creds.ac.uk/publications/the-role-of-energy-demand-reduction-in-achieving-net-zero-in-the-uk/ UK, 2021

[3] https://www.dw.com/en/free-public-transport-in-europe/a-62031236

- Emerging technological solutions to delivery services such as the use of drones should be explored and supported[4].

- As well as decarbonising road vehicles and rail, there needs to be attention to the decarbonisation of ferries and other vessels. In particular, the large increase in the number of cruise liners visiting Scotland in the foreseeable future warrants inclusion of this type of large vessel. In 2023 there will be a 50% hike in the number of cruise ships (150 compared to 100 in 2022) docking at Edinburgh, Fife and Dundee. As well as increases in the number of ships on existing routes there are also new cruise liner destinations including Aberdeen[5]. Additionally, on the west coast, a new deep-water terminal on the Isle of Lewis will allow cruise ships to come ashore for the first time with 60,000 visitors expected to arrive every year[6] . There are various fuel options for such vessels such as green hydrogen, biofuels such as Hydrated Vegetable Oil and biogas produced from waste products. Research is needed into the best fuels based on carbon and biodiversity impacts of the fuel production, as well as its performance.

Energy for agriculture - q35.What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?)

As well as decarbonising energy use, there are opportunities to reduce energy demand and associated emissions from agriculture through various practices. Efficient nutrient management and integrated pest management enable farmers to significantly reduce their inputs, such as pesticides and fertilisers, reducing the associated greenhouse gas emissions from the production and application of these inputs and reducing wider environmental pollution of air, water and soils. Nitrous oxide (N_2O) is a potent greenhouse gas, and agriculture accounts for more than half of N_2O emissions in Scotland in 2020[7]. The Scottish Government should provide appropriate financial and advisory support in the long-term to farmers to help and incentivise farmers to reduce their inputs and decarbonise. In addition, there needs to be a clear, robust and integrated regulatory baseline, consolidating the measures required by law[8], enabling whole farm management plans which support farmers and crofters to use nutrients efficiently, and reduce greenhouse gas emissions.

3. Nature and landscape need to be considered at a strategic level

Impact on nature is mentioned in relation to each renewable technology type and LINK members welcome this. **However, nature and landscapes/ seascapes need to be considered at a strategic level in relation to the ambition for total GW generated, the energy mix from different technologies, and the siting of specific infrastructure**. Currently, it is only in the siting of technologies that impacts on nature and land/sea scapes are considered. See the RSPB 2050 Energy Vision paper[9] which, although out of date, provides an applicable approach.

The major expansion of offshore wind in particular requires a strategic approach. The ESJTP states (P69): "*We recognise the potential impacts on marine biodiversity arising from the major expansion in offshore renewables*

[4] https://www.strath.ac.uk/whystrathclyde/news/2022/nextphaseofprojecttodevelopuksfirstmedicaldeliverydronenetworklaunches/ ; https://www.angus.gov.uk/news/nhs_drone_delivery_service_trials_begin_in_angus
[5] https://www.bbc.co.uk/news/uk-scotland-north-east-orkney-shetland-64390147
[6] https://www.scotsman.com/heritage-and-retro/heritage/scottish-island-gears-up-to-welcome-60000-cruise-ship-passengers-4013093
[7] Section B. Results – Net Sources of Scottish Greenhouse Gas Emissions - Scottish Greenhouse Gas Statistics 2020 - gov.scot (www.gov.scot)
[8] As in the National Minimal Standards being developed in Wales https://research.senedd.wales/media/fqlohe31/agriculture-wales-bill.pdf
[9] https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/the-rspbs-2050-energy-vision---summary-report.pdf

required to achieve our common net zero goals. We commit to working together in a way that recognises this reality and ensures appropriate protection of our natural environment, as part of our joined up approach to tackling the climate and nature crises." There needs to be clarity on how this will work, and how it will be integrated with marine spatial planning, nature conservation, and sectoral management measures. There also needs to be clarity on how this will include partnership with stakeholders. How will the ESJTP be fed into the National Marine Plan 2 and how will this in turn address the challenges of delivering the Blue Economy Vision?

The Draft Strategy makes no mention of land/seascapes at all. It makes no mention of how the proposed new energy developments (including re-powering) and infrastructure will impact on Scotland's cultural and natural landscapes and therefore no mention of the need to plan to avoid these impacts, or to mitigate these where unavoidable. There needs to be a strategic approach to the location of energy infrastructure (and particularly windfarms) in relation to landscape and how this will interact with the process underway leading to one or more new National Parks by 2026. NPF4 states there will be no windfarms in NPs.

With the significant increases in proposed on and offshore wind energy developments (including repowering) and the associated infrastructure that will be required to support them, more than ever the Scottish Government must take the lead in where these developments should be located. **National Strategic Locational Guidance is urgently required from the Scottish Government to guide where new on and offshore wind energy developments and supporting infrastructure are located so that such developments are driven by what is feasible and desirable within existing environmental legislation and guidance, rather than being driven by industry and landowning interests.**

In some habitats, the net gain in terms of emissions reduction of installing infrastructure is questionable due to the disturbance releasing carbon/ destroying sequestration potential. This is acknowledged in the Onshore Wind Policy statement. However, it is also of relevance to the marine environment where the seabed and specific ecosystems offer considerable carbon sequestration and/or storage. **The balance of what can be provided by protection of carbon rich soils and key marine areas in terms of carbon and biodiversity versus the carbon impacts of renewable infrastructure needs to be carefully considered.**

LINK members would welcome new policy from the Scottish Government that restricts development on peatlands. Renewable development on peatlands is increasingly unjustified as the proportion of energy in the UK grid mix that comes from renewable sources continues to rise. We would also welcome a refreshed carbon calculator, which we understand the Scottish Government has committed to reviewing this year. An updated carbon calculator needs to reflect the updated scientific understanding of the extent to which development on peatlands can drain a peatland, with accompanying guidance for developers and also an auditing process to check the results generated by the calculator are consistent and estimates are accurate. We welcome the SG ambition to convene an expert group to develop guidance to support both peatland and onshore wind aims.

The ESJTP should set out a clear expectation for development to follow the mitigation hierarchy.

For onshore wind, requirements, many of which build on existing best practice, could be laid out in the Onshore Wind Sector Deal such as:

- Place nature positive requirements on developers to support the biodiversity enhancement policies in NPF4 and ensure that projects factor in and budget for biodiversity enhancement from the start.

- Habitat restoration plans submitted as part of habitat management plans. Development on peatland required to invest in the restoration of peatland on-site so that overall the carbon savings from the restoration are expected to exceed the carbon losses. Deer management plans completed with landowners on sites where native woodland regeneration has been agreed as part of a habitat restoration plan.
- Developers to provide resources (people and skills, funding or equipment) to enable landowners to restore degraded peatlands on the development site and the wider estate.
- Ensuring peatland restoration is informed by best available scientific evidence.

Equivalent requirements should be developed for all types of energy infrastructure.

4. Attention to materials and circular economy approaches need to be embedded

(Q 19.How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?)

The building of new energy supply infrastructure will be constrained by materials available. Circular economy approaches, extending the life of existing infrastructure and keeping materials in use, can add resilience to supply chains as well as reducing the environmental impact of raw material extraction and processing. Circular economy is currently only briefly mentioned in relation to onshore wind. **Circular economy approaches and a focus on optimising materials needs to be embedded throughout the ESJTP**.

Steel. Based on the potential offshore wind capacity of 38 GW (Figure 15 in the consultation document) and each MW of offshore wind requiring an average of 190 tonnes of steel, over 7.2 Mt of steel will be needed. Currently, Scotland is largely reliant on imports for steel consumed (Scotland has produced less than 6000 tons of crude steel per year in the last three years). All of Scotland's scrap steel is exported. If Scotland had an electric arc furnace (EAF) and reprocessed the scrap steel in Scotland, GHG emissions could be reduced by 60% compared to the way scrap steel is currently managed. Such a plant could create 180 direct jobs and 1,000 indirect jobs[10].

Decommissioning. As the wind sector grows, so too will the need for decommissioning of turbines as they come to the end of their life (EoL). Around 5,500 turbines will be decommissioned in Scotland by 2050, representing nearly 1.5 Mt of materials. As described in Zero Waste Scotland's report on onshore wind turbine decommissioning[11], this can be done in a circular way, if planned for properly. The ZWS report notes storage space and skills as the two biggest constraints - both of which should be addressed by the Government. We note that France requires 45% of roto mass to be reused or recycled, increasing to 55% from 2025[12]. Some energy companies are already investigating re-use and recycling options for wind turbine blades[13] and Vattenfall has set a target to achieve a 50% recycling rate of wind turbine blades by 2025, and 100% by 2030, by self-enforcing a landfill ban on end of life blades from their wind farms[14].

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[10] https://www.zerowastescotland.org.uk/sites/default/files/ZWS1543%20Future%20of%20Work%20-%20Emp%20%26%20Skills%20report%20FINAL%20v2%20SML.pdf

[11] https://www.zerowastescotland.org.uk/research-evidence/future-onshore-wind-decommissioning-scotland

[12] https://reglobal.co/decommissioning-of-onshore-wind-turbines/#:~:text=from%201%20July%202022%2C%20a,(for%20existing%20wind%20turbines).&text=after%201%20January%202023%2C%2045,is%20submitted%20after%20this%20date).

[13] https://orsted.com/en/media/newsroom/news/2021/06/702084352457649

[14] https://www.zerowastescotland.org.uk/sites/default/files/Catapult_end%20of%20life%20materials%20mapping%20offshore%20wind%20Scotland%2007.2022.pdf

LINK members support a circular economy approach to reuse/recycling of materials from oil and gas infrastructure. Government should also consider whether there can be greater biodiversity/climate gains by leaving harmless structures in place (e.g. de facto protection of seabed, less disturbance from transporting materials etc).

Transition minerals. Demand for transition minerals, sometimes known as critical minerals, such as lithium, vanadium and rare earth elements, is growing rapidly across the world. These minerals are needed for the energy transition in Scotland like elsewhere. It is well documented that the supply chain of critical minerals can have hugely damaging impacts on people and the environment. However, neither the type, nor the amount nor the social and environmental impacts of the materials are considered in the ESJTP. In its comprehensive and global assessment of the role of transition materials in the energy transition, the IEA makes six recommendations to policy makers[15]:

- Ensure adequate investment in diversified sources of new supply;
- Promote technology innovation at all points along the value chain;
- Scale up recycling;
- Enhance supply chain resilience and market transparency;
- Mainstream higher environmental, social and governance standards;
- Strengthen international collaboration between producers and consumers.

It is worth noting that in general, increased domestic recycling and reshoring of manufacturing may increase domestic demand for energy, but would decrease global energy needs and carbon emissions; which must be the priority.

Circular economy approaches should be a condition for award of a contract under the Contracts for Difference (CfD) scheme (UK) and other procurement mechanisms and the lifetime carbon impact of the development should be factored into award decisions.

5. Economic and social benefits

(Consultation question 2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?)

Public and Community ownership and benefit. LINK members welcome the statement: '*We will encourage developers to offer community benefit and shared ownership opportunities as standard on all new renewable energy projects – including repowering and extensions to existing projects*' but would like stronger wording.

In Wales, it is a target for renewable energy projects to have an element of local ownership from 2020 and the Government expects '*all new energy projects in Wales to include at least an element of local ownership, in order to retain wealth within Wales and provide real benefit to communities across Wales'*[16].

LINK members would like to see stronger language in the ESJTP to ensure community benefit is the norm.

The Onshore Wind Sector Deal presents an opportunity to outline how economic and social benefits from the onshore wind industry will flow to local communities. We would suggest that maximum benefits would flow to

[15] https://www.iea.org/reports/the-role-of-critical-minerals-in-clean-energy-transitions
[16] https://www.gov.wales/sites/default/files/publications/2020-02/policy-statement-local-ownership-of-energy-generation-in-wales.pdf

communities where they are considered partners in renewable energy projects rather than as beneficiaries only. We would encourage the Scottish Government, via the Onshore Wind Sector Deal, to:

- Introduce an expected percentage of income for communities from development in their area and an option to part-own a development.
- Make sure communities are fairly consulted on the types of benefits they could receive from a development and that the community is asked about how benefits could be apportioned in an equitable way.
- Make sure the community consultation period runs for long enough to ensure most of the community has been able to engage and that the proposal should not be able to proceed to application stage without evidence of meaningful community consultation and a report on how community ideas about benefits have been considered.

Done well, the Onshore Wind Sector Deal could inform agreements with industry related to other types of renewable energy in Scotland.

To retain economic benefits more generally in Scotland, public ownership, or partial public ownership, is desirable[17]. **LINK members support the creation of a public owned energy company that generates and distributes energy. Also, different ownership / governance models that provide for whole or partial public or community ownership or management need to be explored, promoted and facilitated as a priority.**

Just Transition. Although the ESJTP talks about 'green jobs' in its section on 'Preparing Scotland for a just energy transition', there is no assessment of how many there will be or in what sectors. The actions which the Scottish Government and others will have to take to ensure that energy transformation does in fact lead to the creation of new jobs in Scotland are not set out; nor is there any statement about how they will ensure that they will be secure and well-paid.

Despite the growth in renewables, we have been failing to make the most of opportunities for jobs in supply chains or benefits to Scotland, in part because our renewable energy industry is dominated by multinational companies, which do little to benefit Scotland in terms of jobs or supply chain contracts, which are often offshored, or profits, which do not flow to Scotland[18] . There are examples of good practice[19] which can be built on. We would expect significant attention to public ownership, conditionality, fair work and collective bargaining in a document which is meant to describe a just transition.

The development of high quality jobs in the supply chain for renewable energy production is essential for achieving a just transition. The document frequently mentions "boosting our domestic supply chain" – but the opportunities which it talks about have not materialised yet and are unlikely to do so on their own. There is reference to 'expansion of our Supply Chain Development Programme' but this is not explained except in Annex J, which is a list of existing initiatives which have not delivered to date.

The expansion of offshore marine renewables should complement a just transition for all marine industries. Spatial planning must be considered holistically to ensure environmentally sustainable opportunities for climate and nature friendly fishing, and avoid displacement of activities that leads to further environmental damage.

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[17] https://transitioneconomics.net/wp-content/uploads/2022/02/who-owns-the-wind.pdf

[18] https://www.scotsman.com/news/opinion/columnists/scotlands-renewable-energy-scandal-replacement-of-wind-farm-workers-with-cheap-overseas-labour-is-worse-than-po-kenny-macaskill-3920323;
https://stuc.org.uk/files/Policy/Reasearch_Briefings/Broken%20promises%20and%20offshored%20jobs%20report.pdf

[19] https://localenergy.scot/case-studies/ ; https://energysavingtrust.org.uk/wp-content/uploads/2021/03/Community-and-locally-owned-renewable-energy-in-Scotland-2020-report.pdf

This can cause environmental, social and economic consequences which are made more challenging by the pace of change.

5. Supply, technologies and storage

(Consultation questions: Chapter 3 – Energy supply Scaling up renewable energy)

In the ESJTP, future supply aspirations seem to be based on as much as possible – fulfill Scotland's energy needs and then export. As we have noted, nature, land and sea-scape and raw material constraints need to be considered in supply forecasts.

'The significant increase in installed capacity of renewable generation over the coming decade could mean Scotland's annual electricity generation is more than double Scotland's demand by 2030, and more than treble by 2045. This will enable Scotland to meet a large proportion of our demand through renewables alone, while still creating an export opportunity for our surplus'.

We note that this is based on the 'Technology' scenario modelling done by Climatexchange, based on '*reliant on technologies to remove significant amounts of CO_2 by direct air carbon capture and storage (DACCS) and bioenergy with carbon capture and storage (BECCS) used to produce hydrogen and electricity'*.

LINK members do not support this 'technical scenario' approach and are disappointed that this scenario was used as the preferred option for the Energy Strategy. LINK members would like to see SG use an approach with greater emphasis on demand reduction through energy efficiency, behaviour change and circular economy.

(q 15.Our ambition for at least 5 GW of hydrogen production by 2030 and 25 GW by 2045 in Scotland demonstrates the potential for this market. Given the rapid evolution of this sector, what steps should be taken to maximise delivery of this ambition?)

'*The Hydrogen Action Plan sets out our support for the development of both renewable and low-carbon hydrogen with an ambition of 5 GW of renewable and low-carbon hydrogen production by 2030 and 25 GW by 2045. We expect the majority of our 5 GW ambition by 2030 to come from renewables. We wish to see as much renewable hydrogen in our energy system as quickly as possible. In addition to renewable and low-carbon hydrogen production and use, we also support the development of biomass gasification with carbon capture and storage for the production of negative emissions hydrogen.*'

LINK members question what this ambition for hydrogen production is based on? Is this much hydrogen needed? Given how inefficient hydrogen is as an energy source, it must only be used where other renewables are not feasible, such as HGVs or ferries that are otherwise difficult to decarbonise. We understand that with Scotland's renewable energy potential, export of hydrogen is an aspiration; but the material and nature constraints outlined above in this consultation response are relevant.

Any hydrogen production should be renewable and we do not support low-carbon or biomass gasification with carbon capture and storage.

(Q 17.Do you think there are any actions required from Scottish Government to support or steer the appropriate development of bioenergy?

Q 18.What are the key areas for consideration that the Scottish Government should take into account in the development of a Bioenergy Action Plan?)

LINK members are concerned about the land use implications of energy from biomass. Land is better used for biodiversity habitats and food production. In addition, biomass byproducts currently used for energy, often have higher value uses, such as feedstock for the production of renewable chemicals and other valuable products[20].

(Q 25.Should there be a presumption against new exploration for oil and gas?)

LINK members support the presumption against new exploration for oil and gas and recommend that Government sets out a pathway towards ending fossil fuel extraction and use.

(q 36.What are the key actions you would like to see the Scottish Government take in the next 5 years to support the development of CCUS in Scotland?)

LINK members welcome the assurance that CCUS is not to be used to justify unnecessary fossil fuel extraction or emissions. **However, CCUS is an unproven technology and Scottish Government should not rely on CCUS to meet net zero targets.**

6. Outcomes

(Q 49.What are your views on the draft Just Transition outcomes for the Energy Strategy and Just Transition Plan?

Q 50.Do you have any views on appropriate indicators and relevant data sources to measure progress towards, and success of, these outcomes?)

In general, LINK members agree with the range and direction set in the outcomes but would like many of the outcomes to be more specific - for example instead of 'increase' it should be 'increase by x'.

Jobs: Although we agree with the outcomes on access to jobs and better jobs, we do not necessarily think more jobs in total in the energy economy (given its current size and the need to reduce energy demand) should be an outcome. That said, the energy sector is employing many environmental specialists and this is an area of growth, adding to the total number of jobs in the sector. The emphasis should be on access to jobs and good jobs - harnessing the skills and expertise we have and, where these skills are no longer applicable to a zero carbon, nature positive, circular economy, making sure training is in place to enable people to transition to other sectors.

The outcomes relating to **biodiversity and the environment** suggest that this strategy will contribute to nature restoration. If this is to be achieved, considerations for the restoration of nature will need to be embedded across the Strategy. The inclusion of avoiding negative impacts on biodiversity overseas is welcome and means that sourcing of materials for the energy transition will need scrutiny - companies bidding for contracts will need to demonstrate due diligence over supply chains - and highlights the need for a circular economy approach throughout.

[20] see for example Celtic Renewables https://www.celtic-renewables.com/

This consultation response is supported by the following LINK members:

APRS

Badenoch and Strathspey Conservation Group

Cairngorms Campaign

Environmental Rights Centre for Scotland (ERCS)

Froglife

John Muir Trust

Keep Scotland Beautiful

Scottish Wild Land Group

Scottish Wildlife Trust

RSPB Scotland

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