

**Carbon Budget Call for Views**

**August 2025**

**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 organisations, 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.

**Response:**

**1. What are your views on whether the carbon budget regulations set the right level of ambition between 2026 and 2045?**

LINK supports Stop Climate Chaos Scotland's [response](#) to the Carbon Budgets Call for Views.

The ambition appears to be to reach 90% reduction in emission by 2045 from the baseline. If this is the same as meeting net zero then the role of sequestration is important and needs mapping to track trends.

We also note that the ambition is in line with the UK Climate Change Committee's advice. However, achieving these goals will require a step change in action over the next five-ten years. Scotland is currently not meeting previously set targets on peatland restoration or woodland creation, for example, while emissions from agriculture have largely been flat.

Recent Scottish Government policy announcements, including a decision not to follow the CCC advice on reducing livestock numbers, also suggest that other areas e.g. forestry, may have to go even further than current targets. Based on the most recent advice from the CCC on Scotland's carbon budgets, tree planting will have to increase rapidly, now, due to the time it takes for trees to mature and to start absorbing significant levels of carbon.

Significant progress will have to be made in other areas, particularly agriculture, in the coming decade. At the moment, it is not clear from the policies currently set out by the Scottish Government, how agriculture will meet its contribution to the national, economy-wide net zero target.



## **2. What are your views on the content of the Scottish Government's Indicative Statement to accompany the regulations?**

Our view is that the Statement's comments on the land use, land use change and forestry sector's potential contribution to Scotland's Carbon Budget is very weak on the sequestration potential of this sector. Specifically the Statement needs to place greater emphasis on the need to make robust plans for realising this potential in ways that will deliver the vital social and environmental co-benefits the Statement refers to. In order to make such plans, the Statement should establish how much sequestration is being targeted for this sector. While the Statement notes the progress made with woodland creation, this has been slower than intended and, as noted, the progress required for woodland expansion in the Climate Change Plan is likely to increase.

We agree that an integrated approach between farming and forestry can make an important contribution and that public funding through the Forestry Grant Scheme is crucial for practical delivery. The FGS is particularly important because the grant conditions it contains are an effective way to secure co-benefits for nature and communities - we should be trying to rebuild the funds available in the FGS to previous levels to support woodland sequestration, nature restoration, community wellbeing and multi-purpose forestry.

Proper investment in and use of the Land Use Strategy and delivery of RLUP/Fs will be essential for strategically managing different land use priorities and achieving true integration.

Funding a [national deer management programme](#) offers the potential to allow nature to triple the current rate of woodland expansion more cost effectively than conventional fencing and planting-based approaches. The current PfG calls for a pilot of this approach during 2025-26 and plans are underway to implement this to inform how a gradual broadening of this approach to cover all of Scotland.

While the Woodland Carbon Code is a potential source of funding as well, we note the now prolonged period in which the market for carbon offset units has been flat, in price terms. If the carbon price remains below the cost of reducing emissions, there is a real danger that the WCC facilitates continued emissions until the scope for offsetting expires.

Finally, we note the Statement's reference to the need for woodland expansion to follow the principles of sustainable forest management and would like to note the widespread scepticism of communities and eNGOs about the suitability of the UK Forest Standard as a means of securing this. The Standard simply contains too much optionality for commercial operations on social and environmental issues to achieve its own aims.

In the section on Agriculture, the statement suggests the Scottish Government will not follow all the policies set out in the CCC pathway - such as reducing livestock numbers - but goes on to say the approach will focus on "livestock efficiency" to reduce emissions intensity "through improvements in genetics, low-methane breeding and appropriate uptake of methane suppressing feed products". Whilst all of these measures have emissions abatement potential, the CCC has been clear in its



calculations that the biggest contributor in its balanced pathway is livestock reductions (48% of the total by 2035 while other livestock and soil measures combined reach 25% of the 2035 total).

If current trends on livestock numbers continue, then it may well be the case that emissions are reduced even without specific government policies, but if livestock numbers are to be maintained at present levels (as the government seems to be suggesting) then it follows that these emissions reductions will have to be made elsewhere. It also raises questions about future land use trade-offs, and highlights the need for better integration of trees and woodland into farming systems (agroforestry) so that woodland creation targets can be met in a way that allows for livestock numbers to remain stable.

It is important that Scottish Government makes clear in the forthcoming Climate Change Plan exactly what policies will be implemented to reduce emissions in line with targets, and the level of reductions expected from the measures set out (as has been done by the CCC in its most recent report <https://www.theccc.org.uk/publication/scotlands-carbon-budgets/>)

**This response is supported by:**

Borders Forest Trust  
Scottish Wildlife Trust  
Soil Association Scotland  
RSPB Scotland

**For further information contact:**

Dan Paris  
Director of Policy and Engagement  
Scottish Environment LINK  
[dan@scotlink.org](mailto:dan@scotlink.org)



**Scottish Environment LINK** the voice for Scotland's environment

Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899

