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Net Zero, Energy and Transport Committee

Net Zero, Energy and Transport Committee report on the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025



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Net Zero, Energy and Transport Committee

To consider and report on matters falling within the responsibility of the Cabinet Secretary for Transport and the Cabinet Secretary for Climate Action and Energy, with the exception of matters relating to just transition; and on matters relating to land reform, natural resources and peatland, Scottish Land Commission, Crown Estate Scotland and Royal Botanic Garden within the responsibility of the Cabinet Secretary for Rural Affairs, Land Reform and Islands.



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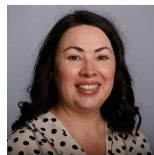
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Introduction

1. This report concerns the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025, laid in the Parliament by the Scottish Government on 19 June 2025. The Regulations, which were laid in draft, are subject to the affirmative procedure – which means they cannot be made unless they have been approved by a resolution of the Parliament.
2. It is for the Net Zero, Energy and Transport Committee, as lead committee, to decide whether or not to recommend approval. On 23 June, the Cabinet Secretary for Climate Action and Energy, Gillian Martin lodged [Motion S6M-18060](#) proposing that the Committee recommends the draft Regulations be approved.

Background

3. The [Climate Change \(Scotland\) Act 2009](#) is the main Scottish legislation on climate change, including climate change targets. It was amended by the [Climate Change \(Emission Reduction Targets\) \(Scotland\) Act 2019](#) to set a net zero target for Scotland of 2045, rather than 2050. The 2019 Act also set interim targets of a 75% reduction in emissions by 2030 and a 90% reduction by 2040.
4. In March 2024 the Climate Change Committee (CCC), the UK's independent expert advisory body on climate change, advised through their [2023 Progress Report to Parliament](#) that the 75% by 2030 target was 'no longer credible'.
5. In response, in April 2024, the Scottish Government announced a [climate change action policy package](#) and that they would produce a Bill to change the way emission reduction targets are legislated for by removing the interim targets and establishing a system of carbon budgets.
6. The [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#) then amended the 2009 Act to replace the system of annual and interim targets leading to the net zero target of 2045 with a system of 5-year carbon budgets.
7. The policy note accompanying these Regulations states that:
 - ” A Scottish carbon budget sets a limit on the amount of greenhouse gases that can be emitted in Scotland over a five-year period. Not exceeding a carbon budget is the “Scottish carbon budget target”. Scottish Ministers have a duty to ensure that each Scottish carbon budget target is met.
8. The Scottish Government are required to consider advice from the “relevant body” (currently the CCC) before laying regulations setting a carbon budget. ¹ The [CCC provided its advice](#) on 21 May 2025. The advice also sets out a "Balanced Pathway" which the CCC model as "an ambitious but credible route to Net Zero for Scotland by 2045".

About the instrument

9. The Regulations set the levels for the four five-yearly carbon budgets from 2026 to 2045.
10. If approved, the Regulations would set the four carbon budgets in line with the CCC's advice. In the Regulations these are expressed as a proportion of the baseline emissions level multiplied by 5 (where 5 is number of years in a Scottish carbon budget period)² - at:
 1. 2026 to 2030 – 43%
 2. 2031 to 2035 – 31%
 3. 2036 to 2040 – 20%
 4. 2041 to 2045 – 6%ⁱ

The Indicative Statement

11. The 2024 Act also requires the Scottish Government to [publish a statement \(an "Indicative Statement"\)](#) when it lays the draft Regulations. This must give an indication of the policies and proposals likely to be included in the Scottish Government's upcoming Climate Change Plan (CCP). The CCP is a Scottish Government strategy document which outlines how it intends to meet both its net zero target and carbon budgets.
12. The draft CCP was initially expected in November 2023. However the then [Cabinet Secretary for Transport, Net Zero and Just Transition announced a delay](#), citing actions of the UK Government which made publishing a draft CCP very difficult. Laying was then further delayed (from November 2024) by the need to legislate to remove the 2030 target.
13. The Indicative Statement indicates a small number of areas (peatland restoration and agriculture) where, whilst the Scottish Government accepts the CCC's headline advice on carbon budget levels, it is likely to depart from some specific aspects of the CCC's advice in the draft CCP. More information is in the relevant sector parts of this report below.
14. The Indicative Statement must also set out during which of the Scottish carbon budgets, the Scottish net emissions account will, for the first time, be 75% and 90% lower than baseline. These percentage reductions were the previous interim targets removed by the 2024 Act, and so give an indication of the proposed rate of change compared to the pre-2024 targets. It says that:

ⁱ The CCC express the budget levels in different terms in their advice - as an average percentage reduction since the 1990 baseline across the 5-year carbon budget period. These numbers are essentially the inverse of those in the Regulations. For example, the fourth carbon budget (2041 to 2045) is 94% lower than the 1990 levels or 6% when expressed as a proportion of the baseline level multiplied by 5. There is no practical difference.

- 75% lower than baseline for the first time will be achieved in the third carbon budget period, 2036-2041.
 - 90% lower than baseline for the first time will be achieved in the fourth carbon budget period, 2041-2045.^{ii 3}
15. The requirement set out in the 2024 Act to lay the Indicative Statement was intended to help the lead Committee, and ultimately the Parliament, to make a more informed decision as to whether to agree to regulations setting a carbon budget, given that the Regulations themselves amount simply to numbers with some basic framing text.
16. An alternative approach that would go further in terms of requiring the Scottish Government to “show its working”, would have been to require a draft CCP to be laid alongside the Regulations. In its Stage 1 report on the Bill for the 2024 Act, this Committee advocated this approach, saying that—
- ” This would allow Parliament, and wider stakeholders, the opportunity to consider the proposed target in the context of the draft plan, and vice versa, drawing attention to their fundamental connectedness. It would, in our view, enable more informed and deep scrutiny.⁴
17. In its reply to the report, the Scottish Government acknowledged the importance of the Committee and Parliament being as well-informed as possible about whether there were workable pathways to meet the targets set out in regulations but rejected this specific proposal on the ground that “confirmation of the targets is needed before we can publish a draft Plan to meet them”.⁵
18. However, an amendment was subsequently made to the Bill to specify that the Indicative Statement must be laid alongside the draft Regulations, rather than any later.
19. In setting the budget levels, the Scottish Government are required to take into account the ‘target setting criteria’. These are set out in full in Section 2B (1) of the 2009 Act⁶, however they include:
- the objective of not exceeding the fair and safe Scottish emissions budget,
 - European and international law and policy relating to climate change
 - scientific knowledge
 - technology
 - Scotland's economic circumstances
 - And the impact on certain groups - those living in poorer or deprived communities and those living in remote rural communities and island communities.
-

ii The CCC Balanced Pathway is more specific, instead setting out the year in which these percentage reductions are reached. They model 75% reduction will be reached in 2036 and 90% will be reached in 2042.

20. The Indicative Statement sets out how the Scottish Government considered each of the target setting criteria. In summary, it appears that Scottish Ministers are satisfied that they have considered each of the criteria through consideration of the CCC advice, the impact assessments completed, and other work.
21. As set out below, the Committee has considered the Indicative Statement as part of its overall scrutiny of the Regulations.

What happens after the Regulations

22. The Parliament's approval of the Regulations triggers the laying of the next draft CCP.
23. Scottish Ministers must lay a draft CCP within two months of the Regulations coming into force.⁷ These Regulations, if agreed to, will come into force on the following day.
24. On [24 July the Cabinet Secretary for Climate Action and Energy told the Committee](#), that if Parliament approve the Regulations prior to October recess, it would be the Scottish Government's aim to lay the draft plan around late October / beginning of November. She reiterated this in her 9 September evidence.⁸
25. The draft CCP must be laid in the Scottish Parliament for a period of 120 days. During this time Scottish Parliament Committees may scrutinise and publish reports on the draft CCP, and the Chamber may debate or consider motions on the draft.⁹
26. Scottish Ministers must then lay a Climate Change Plan within 90 days.¹⁰ The Scottish Government must also publish a response to any resolutions by the Scottish Parliament and any Scottish Parliament Committee reports within three months of them being passed or published.¹¹
27. The [Committee have previously raised concerns with the Cabinet Secretary](#) that the timeline laid out above may clash with the dissolution of the Parliament for the 2026 elections.
28. However, the Cabinet Secretary told the Committee on 9 September that the Scottish Government had confidence that they would be able, within this timeline, to consider public consultation responses and parliamentary reports prior to publishing a final CCP before the end of this Parliamentary Session.¹²

Consideration by the DPLR Committee

29. The Delegated Powers and Law Reform (DPLR) Committee is required to consider every instrument laid before the Parliament and decide whether to draw it to the attention of the Parliament on any of the “reporting grounds” set out in Rule 10.3 of the Parliament’s Standing Orders.
30. The DPLR Committee considered the instrument on 2 September 2025 and reported on it in its [57th report, 2025](#). The DPLR Committee made no recommendations in relation to the instrument.

Consideration by the Net Zero, Energy and Transport Committee

31. On 27 June the Committee launched a targeted Call for Views on the Regulations which closed on 18 August. The Committee received 12 responses from:

1. [Soil Association Scotland \(SAS\)](#)
2. [Royal Scottish Geographic Society \(RSGS\)](#)
3. [Friends of the Earth Scotland \(FOES\)](#)
4. [National Farmers Union Scotland \(NFUS\)](#)
5. [Scotland Beyond Net Zero \(SBNZ\)](#)
6. [Scottish Environment LINK \(SEL\)](#)
7. [Institute for Public Policy Research Scotland \(IPPRS\)](#)
8. [Climate Emergency Response Group \(CERG\)](#)
9. [James Hutton Institute \(JHI\)](#)
10. [WWF Scotland \(WWFS\)](#)
11. [Stop Climate Chaos Scotland \(SCCS\)](#)
12. [Confederation of British Industry \(CBI\)](#)

32. On 2 September the Committee took evidence on the Regulations from the CCC. This was an opportunity for an in-depth discussion with them about their 21 May advice to the Scottish Government.

[Read the Official Report - 2 September 2025](#)

33. On 9 September the Committee then took evidence from a panel of academic experts on the latest science of climate change and efforts (mainly from a national perspective) to adapt to the impacts. The Committee then took evidence on the instrument from the Cabinet Secretary for Climate Action and Energy and officials. Following that, the Committee debated whether to approve the draft Regulations.

[Read the Official Report - 9 September 2025](#)

34. Evidence heard throughout the consideration of the Regulations relates both to the levels of emission reduction proposed in the Regulations and to how the Scottish Government would ensure the budgets are met. More detail on the policies and proposals the Scottish Government intend to implement to reduce emissions is expected in the draft CCP. However, this report takes the opportunity to discuss the evidence heard on the emission reduction levels outlined in the Regulations, the process which has led to them, and the Scottish Government's proposed actions to meet the carbon budgets.

Global emissions reduction

35. The UK is one of 195 signatories of [The Paris Agreement](#), which came into force on 4 November 2016. The main aim of the agreement is to hold “the increase in the global average temperature to well below 2°C above pre-industrial levels” and to pursue efforts “to limit the temperature increase to 1.5°C above pre-industrial levels.”
36. Section 2B (1) (a) of the 2009 Act requires the setting of a “fair and safe Scottish emissions budget”. The Indicative Statement says that a “fair and safe” budget means one based on the “principles set out in article 3 of the United Nations Framework Convention on Climate Change” contributing appropriately to keeping global temperatures within the aims of the Paris agreement.¹³ It says that keeping within the carbon budgets set out in the Regulations and achieving net zero by 2045 would mean adhering to this “fair and safe” requirement.
37. The CCC’s 21 May advice says that “Reducing emissions in line with our Balanced Pathway would keep Scotland within this proposed fair and safe Scottish emissions budget.”¹⁴
38. CCC Director of Analysis, Dr James Richardson said that the international picture is mixed in terms of meeting the goals of the Paris Agreement. He said the United States had taken backward steps on emission reduction but that Chinese emissions have started to fall, which if maintained could be significant. He also said that we have not yet reached peak emissions.¹⁵
39. Dr Ellie Murtagh, an academic specialist in adaptation said:

” The key point is that every fraction of a degree matters. Although there are tipping points at 1.5°, any reduction beyond that reduces our future burden of adaptation, which is key. Within 1.5°, there is still the ability to adapt and manage. At higher levels of warming—at 3° or more—the scale of flooding, heatwaves and sea level rise that we will experience in Scotland will be unmanageable and will overwhelm our ability to cope and adapt.¹⁶
40. Professor Gabi Hegerl, Professor of Climate Science at Edinburgh University said it was beginning to look impossible for the world to keep within the 1.5 degree target. Professor Hegerl said that recent analysis indicates there is only two or three years left (at current emissions trends) in the global carbon budget to meet the 1.5 degree target. But 1.5 degrees is “not a cliff edge”, and that the closer we can stay to it the better.¹⁷

Carbon budget levels for Scotland

41. As noted earlier, the Committee finds itself considering these Regulations in large part because the Scottish Government accepted the CCC’s view that a target of 75% reduction by 2030 was no longer achievable. By setting the pace of emissions reductions between now and 2045, the Regulations set the level of ambition the Scottish Government has for reducing emissions in each of the carbon budget

periods. These set less stretching targets in the short term than was the case before the 2024 Act was agreed. The decline therefore needs to be somewhat steeper at a later point in the 2026-2045 timeline than was previously envisaged. (As noted earlier, the CCC considers its advice to be in line with its own “Balanced Pathway” to net zero by 2045.).

42. Some stakeholders responding to the Call for Views supported the level of ambition in the Regulations (SAS, IPPR, CERG, WWFS, SBNZ & CBIS).¹⁸ SBNZ state that it is in line with “most other developed economies”.¹⁹

43. However, in their response NFUS cautioned that “ambition must be achievable”. They said:

” We have concerns about whether the current proposals are workable for our industry. We believe that carbon budgets must be appropriately balanced between the need to tackle climate change and feasibility for a sector to adapt.

The proposed budgets reflect a significant acceleration in emissions reductions, particularly in agriculture and land use.²⁰

44. FOES took a different view - that the budget levels set too slow a pace of reduction. They argue that developed nations like Scotland need to be significantly more ambitious in reducing emissions due to their historical contribution to climate change.²¹

45. The Cabinet Secretary said that the Scottish Government had aligned with the CCC advice and that the levels “demonstrate that the Scottish Government is committed to ambitious but deliverable climate action.”²²

Levels of detail

46. As alluded to earlier, the question of the right amount and type of information to be provided alongside the draft Regulations, to enable the Parliament to reach an informed conclusion about them, was a major theme of Stage 1 consideration of the Bill for the 2024 Act. The issue was repeatedly raised again during evidence on the Regulations. For example, the IPPRS said in their response to the Call for Views that MSPs have to “decide to approve the budgets ... effectively in ignorance of the policies they would then have to support in order to see the budgets delivered.”²³

47. Various respondents expressed disappointment with the overall level of detail in the Indicative Statement (RSGS, SBNZ, IPPR, JHI, WWFS).²⁴ RSGS said that the Statement gave them no confidence that the implementation of policies to reduce emissions would improve.²⁵

48. Some others were more positive. The CBI welcomed “the breadth and transparency of the Indicative Statement.” They did however note four areas where they felt the statement could have been improved - delivery timelines and funding certainty; integration with economic strategy; enabling conditions; and public engagement on infrastructure.²⁶ NFUS also welcomed the Statement “as a necessary

accompaniment to the carbon budget regulations”, highlighting the clarity it gave on some issues, particularly the rejection of a policy to reduce livestock numbers. ²⁷

49. While not commenting specifically on the levels of detail provided in the Indicative Statement, the Cabinet Secretary did say, in response to questions on the costs of the transition to net zero, that more detail would be set out in the CCP. ²⁸

Finance

50. The Committee’s People’s Panel ⁱⁱⁱ in 2024 unanimously recommended that:

” There needs to be better information, communication and financial support from the Scottish Government on potential household actions to reach targets. So that people can easily understand the benefits of, and implement changes to their homes to make them more energy efficient and understand how they can afford to make changes without putting themselves in debt. ²⁹

51. The CCC advice sets out that:

” When combining capital and operating costs, we expect the Balanced Pathway to result in a net saving during the early 2040s. On average, there will be a net cost of around £750 million per year between 2025 and 2050, which is around 0.4% of Scotland’s GDP. ³⁰

In response to a question about these figures, the Cabinet Secretary highlighted these are “whole-economy figures, not simply Government figures.” ³¹

52. Dr Richardson followed up with the Committee advising that the CCC had some analysis on costs to households across the UK which, while not likely to be exactly the same as Scotland, gives a good indication. This is available at Chapter 8, but especially figure 8.3 of [The Seventh Carbon Budget](#).
53. In their response to the Call for Views, the CBI highlighted their view that delivering on the carbon budgets is a route to sustainable economic growth as shown by their ‘[CBI Economics: The Future is Green](#)’ report. Their Call for Views response said the report found:
- ” that Scotland’s net zero economy has grown by 20.1% since 2022, contributing £9.1 billion in GVA and supporting 100,700 full-time jobs – a 19.5% increase in employment. Jobs in the sector are 38% more productive than the national average, with higher-than-average wages. Net zero businesses in Scotland have also attracted over £3.7 billion in private investment since 2022. ³²
54. The Scottish Fiscal Commission (SFC) published their report, ‘[Fiscal Sustainability Perspectives: Climate Change Mitigation](#)’ on 16 September 2025. They say that

ⁱⁱⁱ In February and March 2024, twenty-three randomly selected panel members, from across the breadth of Scottish demographics, met and exchanged views with experts and Committee Members over two weekends and two online sessions on Section 91 (which covers public engagement on climate change) of the 2009 Act.

there are three ways that climate change can affect public finances:

1. Damage costs
2. Adaptation costs
3. Mitigation costs

In their analysis, which focusses on mitigation spending, they find that "devolved additional public investment required could average £0.7 billion a year, in 2024 prices, from 2026 to 2050" with the largest area of spend expected in buildings, followed by surface transport. They also find that "public spending required in devolved areas is expected to be 26 per cent more per person in Scotland than in the rest of the UK between 2026 and 2050".³³

55. In evidence to the Committee on the Bill for the 2024 Act, the SFC's Chair, Professor Graeme Roy, argued that we needed to be able to track what the Government is spending on tackling climate change and that this needs to be made clear in the CCP.³⁴

56. The Cabinet Secretary said:

” Yearly budget decisions will be made, but we will set out our costings in the Climate Change Plan, too. We will also point to the fact that it is, rightly, not going to be only a Government spend. There must be Government and private contributions to it.

I also point to the cost of not doing it. There is a cost associated with not doing it in terms of the impact that that will have on the resilience of communities. There is also another cost, which points to some of the innovation-related things that I have been talking about. If Scotland is a hothouse for innovative ideas to get us to net zero by 2045, our economy will be boosted as a result of that activity.³⁵

Agriculture and land use

57. In 2022, agriculture was the second highest-emitting sector in Scotland, accounting for 19% of Scotland's emissions. Emissions from agriculture have fallen by 12% between 1990 and 2022. In the CCC pathway, agricultural emissions will fall "by about a third" by 2035 and by about 40% by 2045.³⁶

58. A reduction in livestock numbers (of 26% by 2035, relative to 2023) and low carbon farming methods (e.g. decarbonising machinery, feed additives to inhibit methane in cattle) are each responsible for 48% of the emissions reductions in the Agriculture sector by 2035 in the CCC's pathway.³⁷

59. The Indicative Statement however confirms that the Scottish Government will deviate from the CCC's advice on livestock numbers. It says:

- ” The Climate Change Plan will not follow all the policies for agriculture set out in the CCC’s Balanced Pathway, and will prioritise meeting our climate and nature obligations in a way which works for Scotland. [...] This Government will not bring forward policy to reduce livestock numbers.³⁸
60. In response to the Call for Views NFUS explicitly said they oppose a policy to reduce livestock numbers. They reference the importance of the CCP focusing on the "integration" of land use change with existing land uses like agriculture. While supporting the pledge not to reduce livestock numbers, NFUS want more detail on the alternative of reducing emission through "efficiency and innovation" in the CCP.³⁹
61. Other respondents to the Call for Views commented on the implication of the Scottish Government choosing not to follow the CCC’s advice in this area, and the need to make up for this loss of emissions reductions elsewhere. The JHI for example, highlight that this loss of emissions reductions will have to be made up elsewhere and there will be a need to better integrate trees into farming systems.⁴⁰ SAS and SEL highlight that if current downward trends on livestock numbers continue emissions may reduce "even without specific government policies".⁴¹
62. The CCC's Head of Carbon Budgets, Dr Eoin Devane spoke about the gap that would need to be filled if livestock numbers were not reduced, saying:
- ” In our pathway, we look first of all at measures that can be achieved without reducing livestock numbers, which would deliver about half of the emissions reduction in agriculture that we expect to see. However, the other half of the emissions reduction involves a roughly 26 per cent reduction in livestock numbers by 2035 and a 36 per cent reduction by 2045. If you were not to deliver those reductions, that would add about a megatonne—1 million tonnes—of emissions to the Scottish emissions pathway compared with what we have published.⁴²
63. The Cabinet Secretary said the Scottish Government “fundamentally disagreed that we should have a policy of reducing the herd and livestock numbers more generally.” The reasons given included: the implications on the rural economy in Scotland; the benefits of locally sourced meat in terms of welfare and emissions; disagreeing with the CCC on alternative uses for land that is currently used for sheep farming; and diet choices of the public.⁴³
64. The Cabinet Secretary also clarified the sectors that would decarbonise faster in the Scottish Government's plan than the CCC's modelling to make up for the decision on livestock were:
1. Transport
 2. Industry
 3. Land use (through tree planting and peatland restoration)⁴⁴
65. Land use is a relatively low contributor to overall net emissions, but it is a critical sector due to its potential to act as a carbon sink, from mature trees and restored

peatland.

66. In land use, the restoration of peatlands is the key measure resulting in an expected 75% of the total of land use reductions in 2035 and 55% in 2045 in the CCC Pathway. Woodland creation and management is expected to be responsible for 22% of emissions reductions in 2035 and 28% in 2045. ⁴⁵
67. Professor Hegerl pointed out that land use has "win-win situations" and opportunities for reducing emissions and adaptation to the impacts of climate change. For example, she said that peatland restoration is very effective for carbon sequestration and also for biodiversity. ⁴⁶
68. Some respondents to the Call for Views highlighted the relationship between agriculture and land use, for example, SEL, IPPR, and SCCS highlight the trade off in agriculture and land use policy and that if livestock numbers are not reduced, then woodland creation will need to be integrated into farmland as opposed to being planted on former agricultural land. ⁴⁷
69. The Cabinet Secretary said that the challenge with peatland restoration and tree planting is timing, because it will take longer for the restoration of peatland and planting of trees to have a carbon sequestration impact. On peatland specifically the Cabinet Secretary said we have 2 million hectares of peat, of which 70% is degraded, so the amount of land available for peatland restoration is significant. ⁴⁸

Energy / electricity supply

70. While emissions from electricity are relatively low in Scotland (3% in 2022), the CCC model electricity demand in Scotland to nearly double by 2035 and to almost triple between 2025-45 as a result of the electrification of transport, heating of buildings, and industry. Electrification delivers almost half of the total emissions reductions required throughout the CCC Balanced Pathway. ⁴⁹
71. A key recommendation from the CCC to the UK Government is about making electricity cheaper for households, to make electric technologies cost less. During evidence on 2 September Dr Richardson referred to work they had done on how electricity prices in Great Britain have changed and why. This available at [Annex 3 of the 2025 Report to Parliament](#).
72. The Cabinet Secretary said that bringing down the cost of electricity was a key measure the UK Government should take to support Scotland's emission reduction pathway. She also said she had written to the Secretary of State for Energy Security and Net Zero, Ed Miliband MP, outlining the Scottish Government's view on what actions the UK Government should be taking, including on electricity pricing. The [letter is available on the Scottish Government's website](#).
73. The CCC pathway also assumes that the one remaining large unabated gas power station in Scotland (Peterhead) will close in 2030, and that there are no low-carbon dispatchable power stations that require the use of gas with carbon capture and storage (CCS). ⁵⁰

74. Some stakeholders (FOES & SCCS) responding to the Call for Views said that the wording in the Scottish Government's Indicative Statement implied a support for gas power plants with CCS in some form, therefore indicating a further area of deviation from the CCC's advice.
75. On this, the Cabinet Secretary said she was not able to comment on a planning decision.⁵¹

Transport

76. Surface transport is the highest-emitting sector in Scotland, accounting for 23% of emissions in 2022. Emissions fell by around 1% between 1990 and 2022.⁵²
77. The CCC pathway highlights that it is during the first two carbon budgets when transport emissions will reduce the most: reducing 35% by 2030, 66% by 2035 and 97% by 2045 (from a 2022 baseline). Switching to zero emission vehicles (cars, vans and Heavy Goods Vehicles (HGVs)) is responsible for 81% of all surface transport reductions in 2035.⁵³
78. The Scottish Government's [Climate Change Plan update in 2020](#) included a commitment to reduce car kilometres by 20% by 2030. However, the Cabinet Secretary for Transport announced this would be revised in April 2025, following the January 2025 Audit Scotland report - '[Sustainable transport: Reducing car use](#)' - which highlighted that the Scottish Government did "not have a clear plan to achieve this".
79. The CCC Balanced Pathway has car-km reduction far lower than the previous target - 6% by 2045 (this is only a shift from the baseline, not an absolute reduction).⁵⁴
80. Dr Devane, said the majority of modal shift in their modelling takes place in urban areas where it is easier to build integrated public transport systems and they model low car-km reductions in rural communities.⁵⁵
81. The Cabinet Secretary agreed with the CCC's assertion that modal shift should primarily take place in cities, saying that as part of the just transition in transport, we must take into account Scotland's geography and the need for cars in rural areas.⁵⁶
82. Some responses to the Call for Views (FOES & SCCS) said there was not enough focus on reducing car use in the Indicative Statement and too much emphasis on electric vehicles (EVs), which they said still result in pollution.⁵⁷
83. Dr Richardson said that second hand EVs have already reached price parity with internal combustion vehicles and that we are approaching the point when that will be the case with the new car market, further encouraging the shift to EVs.⁵⁸
84. The Cabinet Secretary said that the Scottish Government has provided support through public charge points - meeting the target to install 6000 two years early.⁵⁹

85. The CCC advice suggests that electrification will also be the main emission reduction method for HGVs. ⁶⁰
86. The Cabinet Secretary said the Scottish Government feel they can do a lot more on decarbonisation of HGVs and that the CCC have been too cautious in their assessment of the use of hydrogen in transport. She added that the cost of electricity remains a barrier to the electrification of HGVs. ⁶¹

Industry and engineered removals

87. Industry is the third highest-emitting sector in Scotland, accounting for 13% of emissions in 2022. Industrial emissions fell by 57% between 1990-2022. ⁶²
88. The CCC pathway indicates that in 2035, 61% of decarbonisation in industry is from electrification, with 16% from efficiency improvements, 14% from CCS and 5% from hydrogen and 4% from bioenergy fuel switches. ⁶³
89. The Indicative Statement says that progress is often dependent on the UK Government. The Cabinet Secretary added that electrification would be the simplest way to decarbonise most of the sector but was dependent on UK Government market reforms to reduce electricity prices. ⁶⁴
90. When asked what the Scottish Government are doing to incentivise industry to decarbonise, the Cabinet Secretary highlighted the Scottish Government have pledged £80 million to develop the Acorn Project, £25 million to support low carbon industries to develop at Grangemouth through Project Willow, and the Scottish Industrial Energy Transformation Fund (SIETF). ⁶⁵
91. Engineered removals are measures that remove CO₂ from the atmosphere to permanent storage e.g. bioenergy CCS (BECCS) and direct air CCS (DACCS). They do not begin contributing until 2030 in the CCC Pathway, but account for 42% of offsetting by 2045 (58% coming from Land Use). ⁶⁶
92. The Scottish net zero target (2045) is earlier than the rest of the UK (2050), in part because of CCC advice that Scotland has a greater potential for engineered removals. Dr Richardson said Scotland has two key advantages in engineered removals: access to storage sites and the very large availability of renewable energy. ⁶⁷
93. The Cabinet Secretary said that if companies developing negative emissions technologies (NETs) in Scotland are supported then Scotland could be an exporter of NETs to the rest of the world, as well as reducing emissions in Scotland. ⁶⁸
94. However, some responses to the Call for Views raised concerns about over-reliance on engineered removals (FOES, SCCS, & WWFS) and recommended a 'Plan B' if the technologies do not mature to the scale expected in the CCC's pathway. ⁶⁹
95. On a Just Transition for workers in the oil and gas sector, Dr Richardson said this was "critical":

- ” Regardless of Government policy on net zero, the industry is going to wind down because of the geology. When we look at the figures that we have reviewed from the North Sea Transition Authority, the difference between new licensing and not new licensing is the difference between a 90 per cent reduction in production and an 85 per cent reduction. Either way, there will be a substantial impact on the industry. The critical issue is to bring in new industry that will create new jobs for people in that area. Those might be green jobs, perhaps from floating offshore wind, or they could be jobs in some other industry entirely, as long as it creates alternatives.⁷⁰

Residential and public buildings

96. Emissions from residential buildings are 12% of the Scottish total, the fourth highest emitting sector. They have fallen 39% since 1990, however 88% of Scottish homes still use fossil fuels.⁷¹ Non-residential buildings emissions accounted for 5% of emissions in 2022, down by 31% since 1990.⁷² The key decarbonisation measures in the CCC’s pathway are low carbon heating and energy efficiency.
97. The Scottish Government’s expected Heat in Buildings Bill was referenced in both the CCC advice and the Indicative Statement. In [April 2025](#), the Scottish Government announced that they would be revising the Bill proposals to remove regulations to upgrade heating in properties at the point of sale. Instead the Bill will establish targets for decarbonising heating systems for Government to reach.
98. The CCC pathway sets out a ramp up of low carbon heating installations, including heat pumps. Dr Devane said that while under 1% of homes have a heat pump in the UK, the CCC have modelled a significant increase to 40% by the mid 2030s. He said these rates of increase are based on the pace at which the Netherlands and Ireland have delivered the ramp up.⁷³
99. The CCC also discussed the connection between reducing electricity prices (largely a reserved issue) and low carbon heating (largely a devolved issue). They said that, as heat pumps are three to four times more energy efficient than a gas boiler, price parity would incentivise people to install heat pumps more quickly to save money on bills. In their modelling, boilers are replaced with low-carbon heating systems in line with their natural replacement cycles.⁷⁴
100. The CCC argue there is an opportunity to address fuel poverty at the same time as reducing emissions. They said that lower energy bills and better insulated homes would reduce fuel poverty.⁷⁵
101. Dr Murtagh said:
- ” 9 per cent of homes in Scotland suffer from damp and mould, which has significant implications for the health and wellbeing of our citizens. That is coupled with the fact that 35 per cent of Scottish homes suffer from fuel poverty, which is one of the highest rates in Europe.⁷⁶
102. The Cabinet Secretary emphasised that the Scottish Government were determined

not to let heat decarbonisation lead to increased fuel poverty. She said that UK Government action to reduce the cost of electricity was key to making low carbon heating a more attractive option and that the draft CCP will set out the Scottish Government's plans in more detail.⁷⁷

Waste

103. In 2022, waste was the eighth highest-emitting sector in Scotland, accounting for 5% of Scotland's emissions. Emissions have fallen 70% since 1990. A reduction of 34% is modelled from a 2022 base for 2030, 56% by 2035 and 80% by 2045.⁷⁸
104. The CCC advice notes that Energy from Waste (EfW) emissions have increased rapidly in the last 10 years and are still on the rise. [The Scottish Government announced in 2022 that no new planning permissions for incineration facilities should be granted](#), however, plants already with planning permission could still be built.
105. On 2 September, the CCC said in oral evidence that it will be important for all EfW plants to ultimately be connected to CCS infrastructure.⁷⁹
106. The Cabinet Secretary said that the Scottish Government has given £1 billion of funding to councils in relation to waste and highlighted the additional money from the UK Government through Extended Producer Responsibility.^{iv 80}

Climate impacts and adaptation

107. The CCP is not required to set out the Scottish Government's proposals for actions to respond to the impacts of climate change. These are instead currently set out in the [Scottish National Adaptation Plan 2024-2029](#). However, Dr Murtagh said that:

” It is imperative to understand that mitigation and adaptation are two sides of the same coin. Mitigation can help us to avoid the unmanageable, but adaptation helps us to manage the unavoidable. Many climate change impacts are locked in, at least for the next 30 years, because of the lifespan of greenhouse gases in our atmosphere. As you say, that will have real-world consequences in Scotland.⁸¹
108. Dr Richardson argued that in taking action to adapt to climate change, Governments should plan for "what would happen in a world much worse than this one".⁸²
109. Witnesses said the impacts of climate change in Scotland will be wide ranging. They will require responses in relation to infrastructure, flooding, coastal hazards,

^{iv} Extended Producer Responsibility seeks to make producers fully financially responsible for the costs of waste management of their products and incentivise reduced consumption of resources and increased recycling. A scheme has been in place for packaging in the UK since 1997 and was extended by regulations which came into force in 2025.

and public health. Professor Fabrice Renaud, Professor of Environmental Risk & Community Resilience at the University of Glasgow and Director of the National Centre for Resilience, said that future infrastructure to support reducing emissions must itself be resilient:

- ” That is an aspect of lock-in—once you have put all this infrastructure in one place, it is almost as if you cannot pull out from it. That situation needs to be avoided at all costs, and having multiple systems delivering critical services will be essential in that respect. ⁸³

Debate

110. Following the oral evidence, the Cabinet Secretary moved motion [S6M-18060](#):

That the Net Zero, Energy and Transport Committee recommends that the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 [draft] be approved.

111. The points highlighted by Committee Members in the debate were:

- Douglas Lumsden said that while he wants to get to net zero, it needs to be in an affordable way, and he does not have enough information from the Scottish Government to know if that will be the case.
- Mark Ruskell said that the Scottish Government have rejected CCC advice on livestock and peatlands and dropped policies on heat and traffic reduction. He said therefore that without a draft Climate Change Plan there are too many unknowns to vote in favour of the Regulations.
- Sarah Boyack said there needs to be a more detailed Climate Change Plan showing how the transition will improve communities and that this should have been a time for detailed actions.
- Kevin Stewart said that the logical way forward would be to approve the Regulations and allow Government to finalise a draft Plan to bring before Parliament to scrutinise.
- Bob Doris said while he agrees that scrutiny would have been enhanced if a draft Plan had been laid at the same time as the Regulations, the correct way forward would be to agree the budgets to ensure the draft Plan is laid and focus efforts on scrutiny of that draft.
- Michael Matheson said that while elements of the process have not been ideal, as Parliamentarians, we have a legal obligation to achieve net zero by 2045 which should be taken seriously.
- Edward Mountain said the lack of information on costings and the timing of the draft Plan being laid in the final months of the parliamentary session mean that the process has been disappointing.

112. The Cabinet Secretary responded to the debate by highlighting that it is not enough to support a target, but that there has to be concerted action to deliver emissions reductions which will meet the net zero target.

113. After debate, the motion was agreed to by division (For 3, Against 0, Abstentions 4).^v

^v For: Bob Doris, Michael Matheson, Kevin Stewart. Abstention: Sarah Boyack, Douglas Lumsden, Edward Mountain, Mark Ruskell

Conclusions and recommendations

114. These are the first regulations setting carbon budgets that this Committee - and the Scottish Parliament – has considered. It is important to begin by acknowledging that, when the Parliament agreed last year to adopt a carbon budgeting system, it did so because it considered it a better and more flexible approach than an approach of annual targets following a straight line towards net zero in 2045. Another plus was that the Scottish Government would only propose carbon budgets in regulations following advice from the Climate Change Committee. The Committee was supportive of the new approach in 2024 and we remain supportive now.

That said, in the event of the Parliament being asked to consider regulations of this type again, there is room for improvement. This mainly relates to the sector-specific information about delivery and actions provided alongside the Regulations. Whilst having an Indicative Statement laying out some of the Scottish Government's thinking has been useful up to a point, the Committee notes the concern raised by several stakeholders about a lack of detail on actions and specific costs in the Statement. This is one of the reasons why some Committee Members were unable to agree to the Regulations. Other Members are satisfied that the Statement, combined with the Climate Change Committee's published advice and the evidence they have received during scrutiny of these Regulations amounts to a sufficiently robust evidence base on which to approve them. In doing so, these Members note that the Scottish Government has followed the CCC's "headline" advice on the carbon budget levels and indicated agreement with most of the CCC's sector-specific advice.

115. Parliamentary Committees and the public also need sufficient detail in the upcoming draft Climate Change Plan to effectively scrutinise it. Some of this is safeguarded by Section 35 of the Climate Change (Scotland) Act 2009, which lists matters a Plan must include. The Committee also specifically requests that the Scottish Government provide:

- The estimated public costs of each policy proposed and *how* these estimates have been calculated.
- How actions set out in the Climate Change Plan will link with the annual financial budget process.
- Details of the publication of other related strategies, bills, and plans alongside the draft Plan which may be required to allow Parliamentary Committees and stakeholders to consider it fully (for example the energy strategy and Heat in Buildings Bill).
- Modelling of emissions reductions from areas where the Scottish Government intend to reduce emissions at a different rate than the Climate Change Committee model in their advice, to account for the decision not to adopt the Climate Change Committee's recommendation to reduce livestock

numbers. This modelling should be clearly explained and provide sufficient detail for scrutiny of these areas in particular to be undertaken effectively.

116. The Committee urges the Scottish Government to stick to its current timetable of laying the draft Climate Change Plan as soon as possible after the upcoming October recess and no later than early November, so as to allow as much time as possible for the Scottish Government to consider representations about the draft, and proposals for improving it, from both the Parliament and the public. There are concerns that there will be little time for the Scottish Government to consider these and then publish a final Plan before the end of the Parliamentary Session.

117. The Committee recognises the Scottish Government's aim to have a finalised Climate Change Plan in place by the end of this session. A new Plan is certainly needed in order to provide a reset on our net zero ambitions, with an improved focus on delivery. The Committee notes that it would fall to the government in power after the next election in May 2026 to implement the Plan - unless it decided to restart the process by laying a new draft shortly into the new session. If not, then given that Parliamentary sessions and Climate Change Plans both tend to run in five-year cycles, the Committee suggests that the next Scottish Government consider a "circuit breaker": laying the next draft earlier in the next session than this time. This would avoid a repeating cycle of draft Climate Change Plans being considered very close to the end of Parliamentary sessions, when scrutiny and response times risk becoming limited.

118. The Committee notes that Scottish Government public consultations normally run for 12 weeks and asks the Scottish Government to confirm this would be the intention for the public consultation on the draft Climate Change Plan.

119. The Committee notes the complicated but critical mix of devolved and reserved matters in relation to emissions reduction policies. It is therefore imperative that both the Scottish Government and UK Government work effectively together and that the Scottish Government are sighted and involved in key actions with cross-border or devolved-reserved elements. The Committee further asks the Scottish Government to clearly lay out in the draft Climate Change Plan the areas of policy where collaborative working with the UK Government will be central to reducing emissions.

Vote recommendation

120. The Committee recommends to the Parliament that the draft Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 be

approved.^{vi}

^{vi} For: Bob Doris, Michael Matheson, Kevin Stewart. Abstention: Sarah Boyack, Douglas Lumsden, Edward Mountain, Mark Ruskell

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Net Zero, Energy and Transport Committee report on the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025, 12th Report, 2025 (Session 6)

- 1 [Climate Change \(Scotland\) Act 2009, Section A4 \(4\) \(b\)](#)
- 2 Scottish Government [Statement to Accompany The Climate Change \(Scotland\) Act 2009 \(Scottish Carbon Budgets\) Amendment Regulations 2025](#)
- 3 Scottish Government [Statement to Accompany The Climate Change \(Scotland\) Act 2009 \(Scottish Carbon Budgets\) Amendment Regulations 2025](#)
- 4 [Net Zero, Energy and Transport Committee Stage 1 report on the Climate Change \(Emissions Reduction Targets\) \(Scotland\) Bill, pg 30](#)
- 5 [Cabinet Secretary response to the Committee's Stage 1 report](#)
- 6 [Climate Change \(Scotland\) Act 2009](#)
- 7 [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024, Section 3 \(1\)](#)
- 8 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 31
- 9 [Climate Change \(Scotland\) Act 2009, Section 35A \(1\) \(a\)](#)
- 10 [Climate Change \(Scotland\) Act 2009, Section 35 \(1\) \(a\)](#)
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- 16 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 4
- 17 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 2
- 18 Written submissions from [Soil Association Scotland](#), [Institute for Public Policy Research](#), [Climate Emergency Response Group](#), [WWF Scotland](#), [Scotland Beyond Net Zero](#), and [Confederation of British Industry](#)
- 19 [Written submission of Scotland Beyond Net Zero](#)
- 20 [Written submission of National Farming Union Scotland](#)
- 21 [Written submission of Friends of the Earth Scotland](#)
- 22 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 30
- 23 [Written submission of Institute for Public Policy Research](#)
- 24 Written submissions from [the Royal Scottish Geographical Society](#), [Scotland Beyond Net Zero](#), [Institute for Public Policy Research](#), [James Hutton Institute](#), and [WWF Scotland](#)

- 25 [Written Submission of the Royal Scottish Geographical Society](#)
- 26 [Written submission of Confederation of British Industry](#)
- 27 [Written submission of National Farming Union Scotland](#)
- 28 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 65
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- 30 [Scotland's Carbon Budgets](#), Climate Change Committee, pg 15
- 31 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 66
- 32 [Written submission of Confederation of British Industry](#)
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- 37 [Scotland's Carbon Budgets](#), Climate Change Committee, pg 70
- 38 Scottish Government [Statement to Accompany The Climate Change \(Scotland\) Act 2009 \(Scottish Carbon Budgets\) Amendment Regulations 2025](#)
- 39 [Written submission of National Farming Union Scotland](#)
- 40 [Written submission of the James Hutton Institute](#)
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- 56 Net Zero, Energy and Transport Committee, [Official Report, 9 September 2025](#), col 45
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