

Conveners Group
Wednesday 24 September 2025
5th Meeting, 2025 (Session 6)

Session 6 Strategic Priority on Net Zero Scrutiny: Draft Climate Change Plan and Climate Change Committee

Introduction

1. One of the Conveners Group's (CG) seven agreed actions under its strategic priority on net zero scrutiny in this session is to issue an annual meeting invite to the [Climate Change Committee](#) (CCC). These discussions are intended to help committees determine priorities for climate change scrutiny in their policy areas by hearing from the CCC on their advice to the Scottish Government.
2. The CCC is an independent statutory expert body, tasked with advising the UK and devolved governments on emissions targets and on preparing for and adapting to the impacts of climate change. Under Scotland's climate change legislation, it has specific duties. These now include giving advice to Scottish Ministers on setting carbon budgets.
3. CG have so far had two meetings with the CCC: on 26 October 2022 and 25 October 2023.¹ On 24 September, CG will hear from Emma Pinchbeck, Chief Executive, and Dr Eoin Devane, Head of Carbon Budgets. This will be the first time CG has heard from Ms Pinchbeck since her appointment in November 2024.

Background

4. The scrutiny of climate change (the issue) and achieving net zero greenhouse gas emissions (the policy response) falls within the Conveners Group's strategic priority to encourage, facilitate and drive forward cross-committee working.
5. In [June 2022](#) Conveners Group agreed seven initial actions as part of a strategic priority on cross cutting scrutiny of net zero and climate change. These were agreed in the context that the Net Zero, Energy and Transport Committee (NZET) Committee plays a leading role, but also supports other committees in effectively embedding climate scrutiny in their own work. The Scottish Parliamentary Service is tasked with delivery of these actions. Action one was for the Group to receive annual updates from the UK CCC.

¹ There was no meeting in 2024 as there was no permanent CCC Chief Executive or Chair during the period when the meeting would have taken place.

Climate Change Committee

6. The CCC is an independent, statutory body established under the UK Climate Change Act 2008 to advise the UK and devolved governments on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to climate change. It publishes Scotland and UK specific reports.
7. On 25 October 2023, the previous Chief Executive, Chris Stark, attended the Conveners Group meeting, which was held in private, and discussion included:
 - COP28 and global progress towards meeting the Paris Agreement long-term temperature goal
 - Shifts in political discourse around climate policy
 - Why climate change and net zero are issues for all committees
 - Importance of climate change and net zero policy and related legislation being scrutinised in effective cross-committee ways
 - Which policy areas would most benefit from enhanced scrutiny.
8. Chris Stark stepped down in April 2024 and [Emma Pinchbeck was announced as the new Chief Executive in October 2024](#). Ms Pinchbeck came to the Scottish Parliament to meet with the Deputy Convener of NZET and officials in December 2024. In July 2025, [Nigel Topping CMG was appointed as Chair](#), replacing Professor Piers Forster who had been interim Chair since 2023.

Purpose of the session

9. This session with Emma Pinchbeck and Eoin Devane builds on previous discussions with the UK CCC. Ms Pinchbeck and Dr Devane will provide an update on latest developments and have been invited to cover:
 - the global context in terms of progress towards climate change mitigation and adaptation, and specific reflections on Scotland's progress in implementing climate adaptation and mitigation policies
 - the CCC advice to the Scottish Government on carbon budgets
 - what evidence the CCC advice is based on
 - how Scottish carbon budgets interrelate with UK carbon budgets, and what impact Scotland's progress in meeting its carbon budgets will have on the UK's ability to meet its budgets and the UK Nationally Determined Contribution
 - Scotland's progress to date in reducing emissions in devolved areas and how this compares to progress at the UK level

- the implications for Scotland and the types of policy approaches in different sectors that will need to be considered to achieve the budgets
- the CCC perspective on the Scottish Government's stated intention in its [indicative statement](#) to deviate from the specific pathways in CCC's advice in terms of how they will achieve emission reduction levels in regard to peatland restoration and agriculture, and the potential impact of this on the pace of change required in other sectors
- any CCC recommendations on the Climate Change Plan (CCP).

Format and themes for questioning

10. Ms Pinchbeck and Dr Devane will make a short introductory contribution, before moving to questions. SPICe has suggested that conveners might like to explore the following themes and issues with the CCC:

- In which sectors has the Government not successfully delivered policies to achieve expected emissions reductions? Why have they gone off-track over the past 5 years and what can be done to get back on track?
- Where the biggest and toughest changes are going to have to be made over the next Parliament to meet the advised levels of carbon budget.
- Any recommendations the CCC has on the forthcoming CCP and what a 'good' CCP would look like.
- Any thoughts the CCP may have on the likely scheduling of draft CCP scrutiny, with the likelihood of a gap of a month or less between the Parliament concluding its scrutiny and the Scottish Government laying a final CCP shortly before dissolution. It would fall to the next Scottish Government to deliver the Plan. Does this raise any concerns or is the most important thing that a new CCP is in place as soon as reasonably possible?
- Given that delivery of the forthcoming CCP will fall predominantly to the next Government to deliver, and the next Parliament to scrutinise, how the CCC is planning to monitor and report on Scotland's progress and any suggestions they have on how the new Parliament should scrutinise delivery of the CCP.
- From the CCC's perspective, which public policy areas require more effective scrutiny?
- Given challenges around targets and implementation over this parliamentary session, in relation to governance, observations from the CCC on how well the Government and agencies are structured to deliver mitigation and adaptation ambitions?
- How committees and convenors could most effectively collaborate with other legislatures, both in the UK and further afield?

Next steps

11. This is the final meeting with the CCC before the end of Session 6. The Conveners Group may wish to reflect on its meetings with the CCC in its legacy report. In the meantime, the NZET Committee will further update other committees on the timetabling of the draft CCP, along with any further suggestions on joint scrutiny in the near future.

Conveners Group clerking team
September 2025

Annexe A: Carbon budgets and the Climate Change Plan

Introduction

1. One of Conveners Group's (CG) seven agreed actions under its strategic priority on net zero scrutiny in this session is to issue an annual invite to the Climate Change Committee (CCC) to attend a meeting. These discussions are intended to help committees determine priorities for climate change scrutiny in their policy areas by hearing from the CCC on their advice to Scottish Government. This briefing provides a more detailed discussion of matters Conveners may wish to explore further in their discussion with the CCC.
2. The discussion takes place at a key point for net zero scrutiny in this Parliamentary session, with a draft Climate Change Plan (CCP) expected to be laid soon. This paper provides some background on that process, with more detailed information about the content of the CCP in the SPICe briefing in [Annexe B](#). Information in Annexe B (for instance about emissions by sector) may also be useful for the discussion with the CCC.

Carbon budgeting and interim net zero targets

3. The Scottish Parliament and Government are legally committed to achieving net zero in carbon emissions by 2045.² Until 2024, they were also committed to meeting interim and annual targets measured in percentages as a straight-line reduction towards net zero in 2045 from a 1990 emissions baseline. This included a legal commitment to reduce emissions by 75% from the baseline by 2030.
4. In its March 2024 [Scotland Progress Report](#), the CCC said the 2030 goal was "no longer credible".
5. In June 2024, the Scottish Government said it accepted this and announced a forthcoming Bill that would, amongst other things, replace straight-line annual targets with a system of 5-year carbon budgeting and, in so doing, remove the 2030 interim target. The Scottish Parliament went on to agree to these and other changes when it passed the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#). This provides that carbon budgets are to be set by regulations laid under the affirmative procedure.
6. Carbon budgets set limits on the amount of greenhouse gas emitted over a given time – although these can also be "translated" into percentage reductions from the 1990 baseline. The UK Parliament and Senedd both also use 5-year carbon budgeting in their climate change legislation. Formally measuring emissions over

² Climate Change (Scotland) Act 2009, section A1. Net Zero is the point when emissions entering the atmosphere are balanced by removals out of the atmosphere

5-year periods rather than annually means that the impact of statistical “noise” such as an unusually warm or cold summer, or of a single significant event, like a major emitter closing, is smoothed out over this longer period, enabling more focus on long-term trends. This was one of the reasons for the CCC saying they supported the change when they gave evidence on the Bill for the 2024 Act.

7. Under the 2024 Act, the CCC now have a direct role in helping the Scottish Government and Scottish Parliament set interim targets. The Scottish Government must consider CCC advice before laying budget-setting regulations. The CCC provided its [first such advice on 21 May](#). It recommended setting emissions levels³ at:
 - 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).
 - 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).
 - 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).
 - 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).
8. The CCC’s advice also outlines a ‘balanced pathway’ to achieve these targets and reach net zero by 2045. The balanced pathway is a series of policies and outcomes which the CCC describe as ‘an ambitious but credible route to Net Zero for Scotland by 2045’.
9. The [latest available data for emission reduction from the Scottish Government](#) shows that Scottish emissions in 2023 were down 51.3% from 1990.
10. On 19 June, the Scottish Government laid [draft regulations setting four carbon budgets for 2026-45](#). These propose budget levels in line with the CCC’s advice. As the 2024 Act requires, the [Scottish Government also published a statement alongside the regulations](#), setting out, in indicative terms, the policies and proposals that can be expected in the upcoming draft CCP. This sets out that the Scottish Government intend to deviate from the CCC’s advice and balanced pathway in *how* they will achieve these emissions reduction levels in two policy areas: peatland restoration and agriculture (further discussion in Annexe A).
11. The NZET Committee considered the regulations on 2 and 9 September. It took evidence from the [CCC on 2 September](#) and from a panel of experts on climate science and climate change adaptation on [9 September](#). It also heard closing evidence from the Cabinet Secretary for Climate Action and Energy on 9 September 2025 (OR via same link), and then debated the motion proposing that the Committee recommend the draft regulations be approved. After debate, the motion was agreed to by division (For 3, Against 0, Abstentions 4).
12. In her oral evidence on 9 September, the Cabinet Secretary indicated that the Scottish Government may ‘go faster’ than the CCC balanced pathway on

³ NB: these are to be understood as *averages* over the 5-year period of each budget. This is why the recommendation for the Fourth Budget is for a 94% not 100% reduction. But the statutory target of achieving net zero by 2045 remains.

transport, industrial decarbonisation, peatland restoration and tree-planting to account for the emission reduction measures in the CCC pathway they do not intend to take forward.

13. The NZET Committee expects to report on the regulations by end w/c 21 September and the instrument is expected to be taken in the Chamber shortly before October recess.

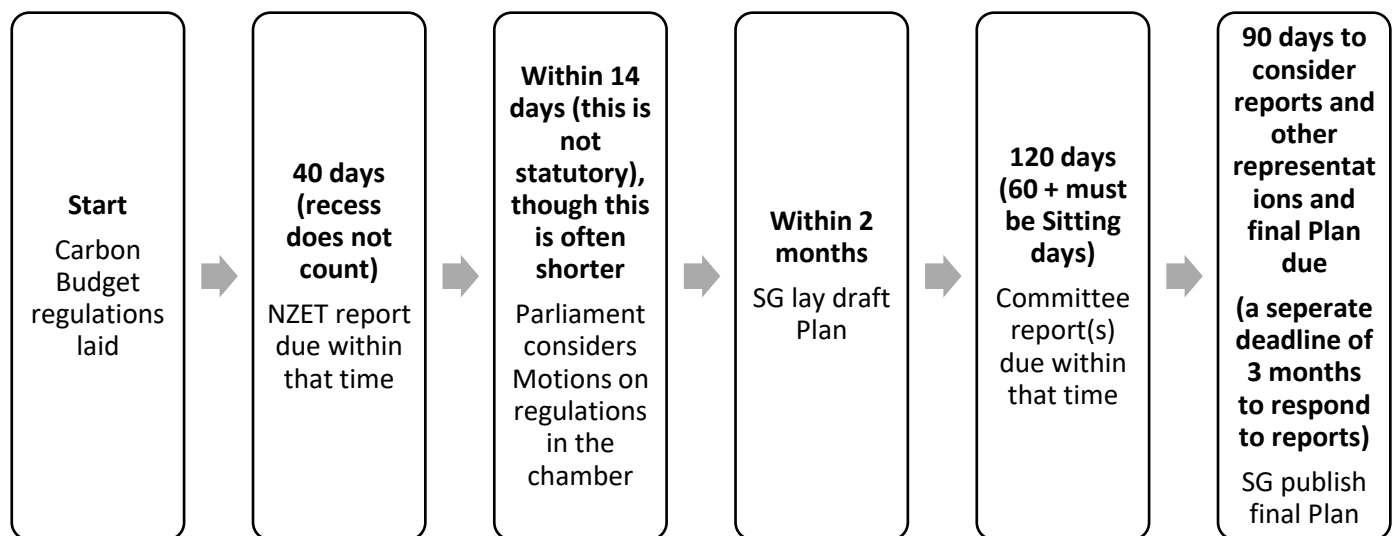
Next draft Climate Change Plan: timing

14. The regulations are important in themselves but also because, under the 2024 Act, they trigger the next draft CCP. The CCP is a strategy document which outlines how the Scottish Government intends to meet emissions reduction targets across all portfolio areas and sectors of the economy. If the regulations are agreed to, the Scottish Government must lay the draft CCP within two months of their coming into force (which is the day after they are agreed).
15. The [Cabinet Secretary for Climate Action and Energy told the NZET Committee](#) on 24 July that, if the regulations are approved before October recess, the Scottish Government aims to lay the draft CCP in late October or early November. She told the NZET Committee on 9 September this was still the aim.
16. Once a draft is laid, the Scottish Parliament now has up to 120 days to consider it, compared to 60 when it last considered a statutory draft.⁴ In practice, this could include committees reporting on it, holding a chamber debate on it, or considering and agreeing a resolution about it. After Scottish Parliament scrutiny has ended, the Scottish Government must:
 - a. Lay a final CCP within 90 days. Forty-five of these must be days on which Parliament is not dissolved or in recess, otherwise the clock is stopped. So far, no dissolution period before a Scottish Parliament election has reached 45 days so the election is unlikely to stop the clock;
 - b. Publish a response to any resolutions relating to the draft CCP passed by Parliament or any Committee reports within three months of it passing or being published respectively.
17. (See [Annexe B](#) for further detail on details of CCP scrutiny including how the process has changed since the last time one was laid in Parliament.)
18. The Scottish Government originally intended to lay a draft CCP in November 2023 but postponed this. It said that new UK Government climate change policies announced by the then Prime Minister on 20 September 2023 had made preparing a Plan by this timescale difficult or impossible.
19. Plans to lay a draft in autumn 2024, as effectively required under the legislation then in force, were also postponed, in the light of the Scottish Government

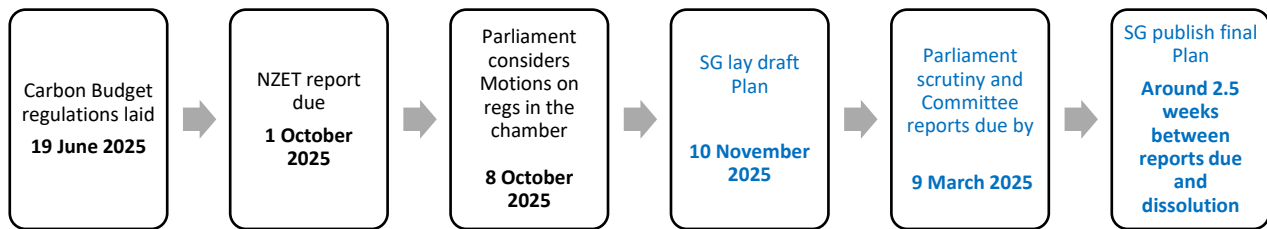
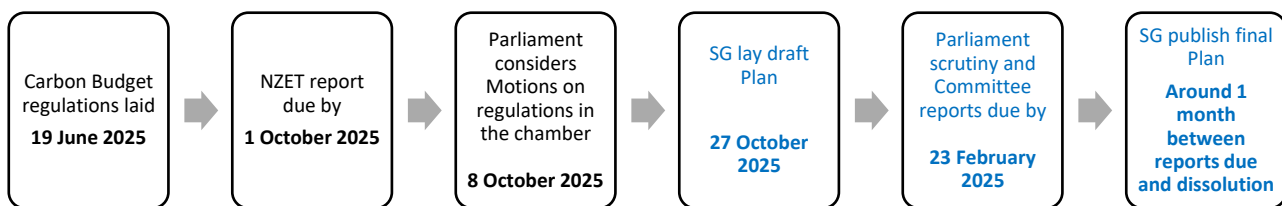
⁴ For present purposes, this should be considered 120 calendar days. If more than 60 of the 120 days are recess days, the clock is stopped but this wouldn't happen if the Scottish Government sticks to its proposed laying timeframe.

accepting the CCC's verdict that achieving the 2030 interim target was no longer credible. The 2024 Act set out a revised timetabling process that, in effect, pushed the laying date back.

20. The 2025-26 Programme for Government says the Scottish Government will publish a final CCP before dissolution. The Cabinet Secretary for Climate Action and Energy has confirmed to the NZET Committee that this remains the position, most recently in her 9 September evidence on the regulations.
21. Should the draft CCP be laid in line with the Cabinet Secretary's expectations, in late October or early November, the 90-day time limit the Scottish Government has to respond to any reports or resolutions of the Scottish Parliament will fall well after dissolution. This is likely to be the case even if the Scottish Parliament decided to conclude its scrutiny in well under the 120 days it is entitled to.
22. The NZET Committee expressed concerns about what appeared to be a very tight timetable for laying a finalised CCP in [correspondence with the Cabinet Secretary](#) in June. In her 9 September evidence to the NZET Committee, the Cabinet Secretary said she was satisfied that there would be adequate time for the Scottish Government to lay a Plan before dissolution that took account of views from the Parliament and the public. Here is a graphic of the statutory timeline for laying (a) carbon budget regulations, (b) the draft CCP and (c) the finalised CCP.



23. And here are two “real-life” scenarios, based on the Scottish Government's aim of laying a draft CCP between late October and early November, picking dates at two “extremes” of that margin. It assumes a last sitting day of about 25 March:

Scenario 1**Scenario 2****Next draft Climate Change Plan: approach to scrutiny**

24. Collaborative cross-committee scrutiny of climate change is an agreed [strategic priority](#) for CG. This forthcoming draft CCP is the single most important opportunity for committees to put this into practice.
25. CG discussed collaboration on the next CCP in [June 2023](#) and again in [November 2024](#), and endorsed the principle of cross-committee scrutiny working towards a joint debate led by the NZET convener when the 120 days are over.
26. The NZET Convener wrote to Conveners in [March 2025](#) and again in [June 2025](#) outlining the Committee's proposed Call for Views, and the unfolding timeline for scrutiny of the draft CCP. The NZET Committee decided to run the Call for Views *in anticipation of* the draft CCP being laid, rather than after it had been laid, to avoid a confusing scenario of the Scottish Government and Scottish Parliament both running consultations on the same document at the same time. Note this was not launched as a 'joint' Call for Views because of the timing of the laying of the carbon budget regulations just before summer recess, as the NZET Convener updated the CG of in June.
27. These letters also strongly encouraged committees, especially those scrutinising sectors where emissions reductions are most needed, to consider engaging in draft CCP scrutiny as much as their other commitments would allow. Committees were also encouraged to, if possible, to conclude their scrutiny sufficiently in advance of the 120-day deadline to allow the NZET Committee to note their main conclusions and incorporate any key findings or common threads into its own report, so as to fulfil its leading and coordinating role. (But Committees can still report or write directly to the Scottish Government near the end of the 120 days if this is a more realistic option.)

28. SPICe have produced blogs on the relationship between committee remits and climate change, which are available on a [SPICe Hub](#) and may be helpful for committee's considering areas of the draft CCP they may scrutinise.

Abbi Hobbs, Niall Kerr and Alasdair Reid, SPICe Research
12 September 2025

Note: Committee briefing papers are provided by SPICe for the use of Scottish Parliament committees and clerking staff. They provide focused information or respond to specific questions or areas of interest to committees and are not intended to offer comprehensive coverage of a subject area.

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Annexe B: Draft Climate Change Plan

Introduction

1. The draft Climate Change Plan (CCP) is a Scottish Government strategy document which outlines how it intends to meet emissions reduction targets across all portfolio areas and sectors of the economy. These targets have been set and revised by Parliament in three pieces of legislation – the [Climate Change \(Scotland\) Act 2009](#), the [Climate Change \(Emission Reduction Targets\) \(Scotland\) Act 2019](#), and the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#). The legislation includes a statutory requirement for the Scottish Government to publish a draft Plan on how they intend to meet the targets. This is laid in Parliament for consideration by committees, with the Net Zero, Energy and Transport (NZET) Committee as lead Committee for the upcoming draft Plan.
2. This will be the first time the Scottish Parliament has considered a statutory CCP in draft form since the passing of the Climate Change (Emissions Targets) (Scotland) Acts of 2019 and 2024. Following the 2019 Act, the period for Parliamentary consideration of the draft CCP is 120 days.
3. The draft Plan must include information on how they will reduce emissions in the following sectors:
 - energy supply;
 - transport (including international aviation and shipping);
 - business and industrial process;
 - residential and public (in relation to buildings in those sectors);
 - waste management;
 - land use, land use change and forestry; and
 - agriculture.
4. These sectors are required to be covered by the legislation, but in the most recent CCPs the Sector titles used have been different, for example, residential and public is called Buildings and includes commercial buildings.
5. In addition to this, the draft plan must contain information on various specific policy areas such as regional land use partnerships, fossil fuels, district heating, electric vehicles, a whole farm approach to emissions accounting, carbon capture and storage, and energy efficient housing. Previous Plans have contained information on behaviour change and public engagement.

6. Since the 2019 legislation, the Plan must be prepared in accordance with just transition and climate justice principles.
7. Previously, committees of the Scottish Parliament have collaborated on scrutiny of draft Plans, considering chapters and elements relevant to their remits. The Conveners Group have agreed a strategic priority on cross committee collaboration on net zero for Session 6, with a collective mission to ensure effective scrutiny of a topic which impacts, to some extent, on all Committee remits.

Background

Climate Change (Scotland) Act 2009

8. The [Climate Change \(Scotland\) Act 2009](#) (the Act) was passed by the Scottish Parliament in June 2009. This provided a statutory framework to reduce emissions of greenhouse gases in Scotland by setting an interim 42 per cent reduction target for 2020, with the power for this target to be varied based on expert advice, and an 80 per cent reduction target for 2050.
9. The Act also required that annual targets, consistent with the 2020 and 2050 targets, were set out by secondary legislation. These annual targets were set in batches, for example, 2010-2022 and then 2023-27. This model of target setting has been superseded by new approaches set out in the Climate Change (Emission Reduction Targets) (Scotland) Act 2019 and the 2024 legislation (see below for more information).
10. Section 35 of the 2009 Act required that after each batch of annual targets had been set the Scottish Government produce a report on proposals on policies (RPP) that sets out how the Scottish Government intends to meet its climate change targets.
11. The Act required that a draft RPP is laid in the Scottish Parliament for parliamentary consideration of 60 days and requires Scottish Ministers to have regard to:
 - a. any representations on the draft report made to them;
 - b. any resolution relating to the draft report passed by the Parliament; and
 - c. any report relating to the draft report published by any committee of the Parliament for the time being appointed by virtue of standing orders.

Parliamentary consideration of the draft RPP1

12. In November 2010 a draft report (RPP1) was laid and was subject to a 60-day period for parliamentary consideration. The draft RPP1 was structured around a number of chapters covering energy supply, homes and communities, business and the public sector, transport, rural land use and waste. Proposals and policies for meeting annual climate change emission reduction targets were identified for each chapter.

13. The draft RPP1 was considered by the Transport Infrastructure and Climate Change Committee (TICC), which had responsibility for scrutinising climate change matters in Session 3. The TICC Committee consulted with a number of other Committees on the draft RPP1. However, the timescale for considering and reporting was extremely challenging. The time for consideration was contracted further for those Committees reporting to the TICC Committee, resulting in the Rural Affairs and Environment Committee declining to engage in the scrutiny process. The TICC Committee appended the report of the Economy Energy and Tourism Committee to its report but had little time to review or comment on this. In considering the draft RPP1 there was some duplication and overlap in evidence to Committees and in stakeholder engagement.
14. The final Scottish Government report (RPP1), incorporating changes as a result of parliamentary scrutiny, was laid in March 2011.

Parliamentary consideration of the draft RPP2

15. The [Draft](#) Second Report on Proposals and Policies (RPP2) focusing on the achievement of Scotland's annual climate change targets for 2013-2027 was laid before the Scottish Parliament on 29 January 2013. The 60-day period for Parliamentary consideration ran until 29 March 2013.
16. In seeking to apply the lessons learned in scrutinising the draft RPP1 and to further strengthen the mainstreaming of climate change scrutiny the Parliamentary Committees with an interest in the draft RPP2 adopted a co-ordinated approach to scrutiny of the draft RPP2. During this period, the following four Parliamentary subject committees received written and oral evidence on the draft report, and the reports were published on 22 March 2013:
 - [Rural Affairs, Climate Change and Environment Committee \(RACCE\)](#)
 - [Economy, Energy and Tourism Committee \(EET\)](#)
 - [Infrastructure and Capital Investment Committee \(ICI\)](#)
 - [Local Government and Regeneration Committee \(LGR\)](#)
17. A [Parliamentary debate](#) on the draft RPP2 and Committee recommendations took place on 26 March, 2013. On 27th June 2013 the Scottish Government published the final [RPP2](#).
18. The parliamentary approach to scrutiny of RPP2 was co-ordinated:
 - The RACCE committee issued a joint call for views with the ICI, EET and LGR Committees and to work as collaboratively as possible in relation to stakeholder communications and on media work;
 - The four individual Committees reported separately to the Parliament, ensuring as long a period as possible for each Committee to take evidence and co-ordinate the publication of Committee reports; and

- A motion in the names of all four Committees who reported on the draft RPP2 secured a Chamber debate.

Parliamentary consideration of the draft of RPP3

19. The [Climate Change Plan: Third Report on Proposals and Policies \(RPP3\)](#) focusing on the achievement of Scotland's annual climate change targets for 2018-2032 was laid in draft in the Scottish Parliament on 20 January 2017. It was subject to a 60-day period for scrutiny by four parliamentary committees. Parliamentary consideration of the draft Plan was undertaken collaboratively by the following committees using the framework developed for scrutiny by RPP2:
 - Environment, Climate Change, and Land Reform Committee
 - Rural Economy and Connectivity Committee
 - Local Government and Communities Committee
 - Economy, Jobs and Fair Work Committee
20. The Committees held a joint call for views and collaborated on promotion of their work. Each Committee scrutinised different, pre-agreed chapters of the draft plan and reported individually to the Scottish Government. The Parliamentary scrutiny process generated over two hundred recommendations for the Scottish Government. A Parliamentary debate on the Committee reports on the draft CCP took place on 16 March 2017. The Government responded via [a written statement](#) in pursuant of Section 35 the Climate Change (Scotland) Act, published on 20 February 2018.
21. The Climate Change Committee (CCC), which is the independent, statutory body that advises the UK and devolved governments on emissions targets and to report to Parliament on progress, published its progress report '[Reducing emission in Scotland](#)' in September 2017 (the CCC have produced 'Reports to Parliament - Progress on reducing emission in Scotland' every year from 2012 – 2023), which provided its assessment of the draft plan. The final Plan was laid in Parliament on 28 February 2018.

Climate Change (Emission Reduction Targets) (Scotland) Act 2019

22. The Climate Change (Scotland) Act 2009 was amended by [the Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2019](#). This increased the ambition of Scotland's emissions reduction targets to net zero by 2045 and revised interim and annual emissions reduction targets. The changes responded to advice from the CCC and raised the ambition of the 2030 and 2040 targets to 75% and 90% reductions respectively.
23. The amendments also update arrangements for CCPs to meet the targets and includes new measures, such as creation of a Citizens Assembly and a Scottish Nitrogen Balance Sheet. The 2019 Act placed [the monitoring framework for the Climate Change Plan on to a statutory footing](#) for the first time, with sector by sector reports on progress and the inclusion of matters relevant to a just

transition. It also increased the parliamentary scrutiny period for the draft plan to 120 days and introduced a fixed 5-year commitment to publish a CCP:

- a. in the case of the first plan, before the end of the period of 5 years beginning with the day on which this section comes into force;
- b. in the case of each subsequent plan, before the end of the period of 5 years beginning with the day on which the previous plan was laid.

24. The 2019 Act changed the model of target setting introduced by the 2009 Act and required Scottish Ministers to set annually reducing emission targets for each year between these three major target years (2030, 2040 and 2045). It required annual targets to be calculated on straight line between interim targets e.g. 2021-2029, 2031-2039 and 2041-2045 and as a % reduction.

Update to the Climate Change Plan (2018-32)

25. Due to the increased ambition in the 2019 Act, the Scottish Government undertook to revise the 2018 CCP within 6 months of the Act. This was, however, postponed due to the Covid-19 pandemic. The draft CCP update was eventually published on the 16 December 2020.

26. As this was an [extraordinary update rather than a new CCP](#), as part of the regular 5-year cycle, the laying, and scrutiny of this draft CCPu did not fall within the purview of the 2009 Act. Despite this, four parliamentary committees agreed a joint approach to scrutiny of the new plan.

27. The [Environment, Climate Change and Land Reform \(ECCLR\) Committee led scrutiny](#) of the updated plan in collaboration with the Economy, Energy and Fair Work (EEFW) Committee, Local Government and Communities (LGC) Committee and the Rural Economy and Connectivity (REC) Committee. Following evidence sessions in January and February 2021, the four committees reported directly to the Parliament in March 2021 ([ECCLR](#), [EEFW](#), [LGC](#) and [REC](#)) and the Scottish Government provided an initial response in the parliamentary debate on 9 March 2021.

28. The update set out that the next statutory CCP was to be completed by early 2025.

2023 Climate Change Committee Report to Parliament on progress in reducing emissions in Scotland

29. The most recent CCC annual report on progress in reducing emissions in Scotland is the [2023 Report to Parliament](#), which was published in March 2024. It reported that achievement of the 2030 target was now “beyond what is credible” and that “overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets.”

30. Following CCC’s 2023 Report, in April 2024 the [Scottish Government reconfirmed its commitment to the 2045 net zero target, but announced plans](#) to make ‘minor’ changes to climate change legislation to move Scotland to a system of 5-yearly carbon budgets and away from a system of annual targets.

Climate Change (Emission Reduction Targets) (Scotland) Act 2024

31. In September 2024, the Scottish Government introduced the [Climate Change \(Emissions Reduction Targets \(Scotland\) Bill](#). The lead Committee for the Bill was NZET. The Bill became an Act on 22 November 2024.

32. Amongst other things, the 2024 Act:

- Repealed the interim 2030 and 2040 targets for emissions reduction and abolished the system of annual percentage-based targets for emission reductions set out in a straight line between the interim targets. The 2045 target of net zero emissions was retained.
- Replaced the system of target setting with a system of 5-year carbon budgets, expressing the target as an amount in carbon tonnage, to be set by regulation by the Scottish Government following advice from the CCC.
- Removed the requirement for a new CCP to be laid by March 2025, replacing it with the requirement for a Plan to be laid before the Scottish Parliament within 2 months of the carbon budget regulations coming into force.

Carbon budget regulations

33. The Climate Change Committee (CCC) published '[Scotland's Carbon Budgets: Advice for the Scottish Government](#)' on 21 May 2025. In line with the Act, the CCC report sets out their advice on the level of Scotland's four carbon budgets, covering the period 2026 to 2045. They recommend that the Scottish Government sets its carbon budgets at annual average levels of emissions that are:

- 57% lower than 1990 levels for the First Carbon Budget (2026 to 2030).
- 69% lower than 1990 levels for the Second Carbon Budget (2031 to 2035).
- 80% lower than 1990 levels for the Third Carbon Budget (2036 to 2040).
- 94% lower than 1990 levels for the Fourth Carbon Budget (2041 to 2045).⁵

34. The most recent [Scottish GHG statistics](#) were published in June 2025, for the year 2023. They report a 51.3% reduction in emissions since 1990. See 'Background on Scotland's progress' in cutting emissions for more information.

35. The CCC report also sets the actions which would be required to follow the 'balanced pathway'⁶ to stay within the above carbon budgets. They describe the

⁵ The carbon budgets are given as five-year average percentage reductions from 1990 levels. As of 2023, the latest year for which there is data, emissions were 51.3% below 1990 levels.

⁶ The CCC describe the 'balanced pathway' as "an ambitious but credible route to Net Zero for Scotland by 2045."

targets as ‘deliverable’ but that ‘getting to Net Zero by 2045 will require immediate action, at pace and scale’.

36. In [correspondence in January 2025](#), the Acting Cabinet Secretary told the NZET Committee that they intended to lay the regulations in late May, if possible within a week of the CCC advice. The Scottish Government subsequently laid [draft regulations setting carbon budgets](#) for the next four 5-year carbon budget periods, running from 2026 – 2045 on 19 June 2025. The 19 June regulations amount to an acceptance of the CCC’s overall advice on targets and are framed so as to implement it.⁷ The draft regulations are subject to the affirmative procedure.
37. The NZET Committee ran a targeted Call for Views on the Climate Change (Scotland) Act 2009 (Scottish Carbon Budgets) Amendment Regulations 2025 from 27 June to 18 August. 12 responses were received and are [published on the website](#). A [SPICe analysis of the key themes](#) has also been published.
38. On [2 September 2025](#), the CCC’s Dr James Richardson and Dr Eoin Devane gave evidence to the NZET Committee on the regulations. On [9 September 2025](#), the NZET Committee heard from a panel of researchers on the climate science and from the Cabinet Secretary for Climate Action and Energy and officials.
39. The NZET Committee expects to report on the regulations by end w/c 21 September and the instrument is expected to be taken in the Chamber shortly before October recess.

Forthcoming Climate Change Plan

40. The laying of the regulations is a precursor to the laying of the draft Climate Change Plan. If and when the regulations come into force (which would be a day after they are agreed), the Scottish Government is then legally required to lay a draft CCP within two months.⁸
41. In a [letter from the Acting Cabinet Secretary to the NZET Committee in January 2025](#), the Government stated that: “after confirmation of carbon budgets I would aim for the draft CCP to be laid in Parliament and published in late September 2025”.⁹

⁷ The regulations express the budget levels in different terms, as a ‘Proportion of budget-relevant baseline’ as opposed to the CCC advice, which sets out the percentage reduction since the baseline. There is no practical difference.

⁸ Under the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#), Scottish Ministers must lay a draft climate change plan before the Scottish Parliament before the end of the period of 2 months beginning with the day that the first regulations setting a Scottish carbon budget under section A4 of the Climate Change (Scotland) Act 2009 come into force.

⁹ Under the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#), Scottish Ministers must lay a draft climate change plan before the Scottish Parliament before the end of the period of 2 months beginning with the day that the first regulations setting a Scottish carbon budget under section A4 of the Climate Change (Scotland) Act 2009 come into force.

Indicative Statement

42. The 2024 Act also provides that the Scottish Government must lay an ‘indicative statement’, alongside the regulations. This must set out, in indicative terms, the proposals and policies in relation to each of the sectors which are likely to be set out in the next CCP. The [published indicative statement](#) includes some commentary on particular areas where the Scottish Government intends to deviate from the CCC's advice in *how* they will achieve these emission reduction levels. We can expect the draft Climate Change Plan to provide more detail on this, but the statement provides some information.
43. The two areas singled out in this way are peatland restoration and agriculture. The statement says:
- "For the avoidance of doubt, the pathway that is set out within the CCP will reflect the Scottish Ministers' proposed pathway to net zero – this means that for agriculture and peatland we will not follow the CCC's specific recommendations, instead we will implement solutions to ensure we meet our net zero and nature obligations in a way which works for rural communities."
44. It does not appear clear from the statement whether the Scottish Government considers that the reductions in the CCC advice in these areas can be met without following the specific pathways to them that the CCC sets out or, alternatively, whether the Scottish Government considers the difference can be made up elsewhere, by change happening at a faster pace in other sectors.

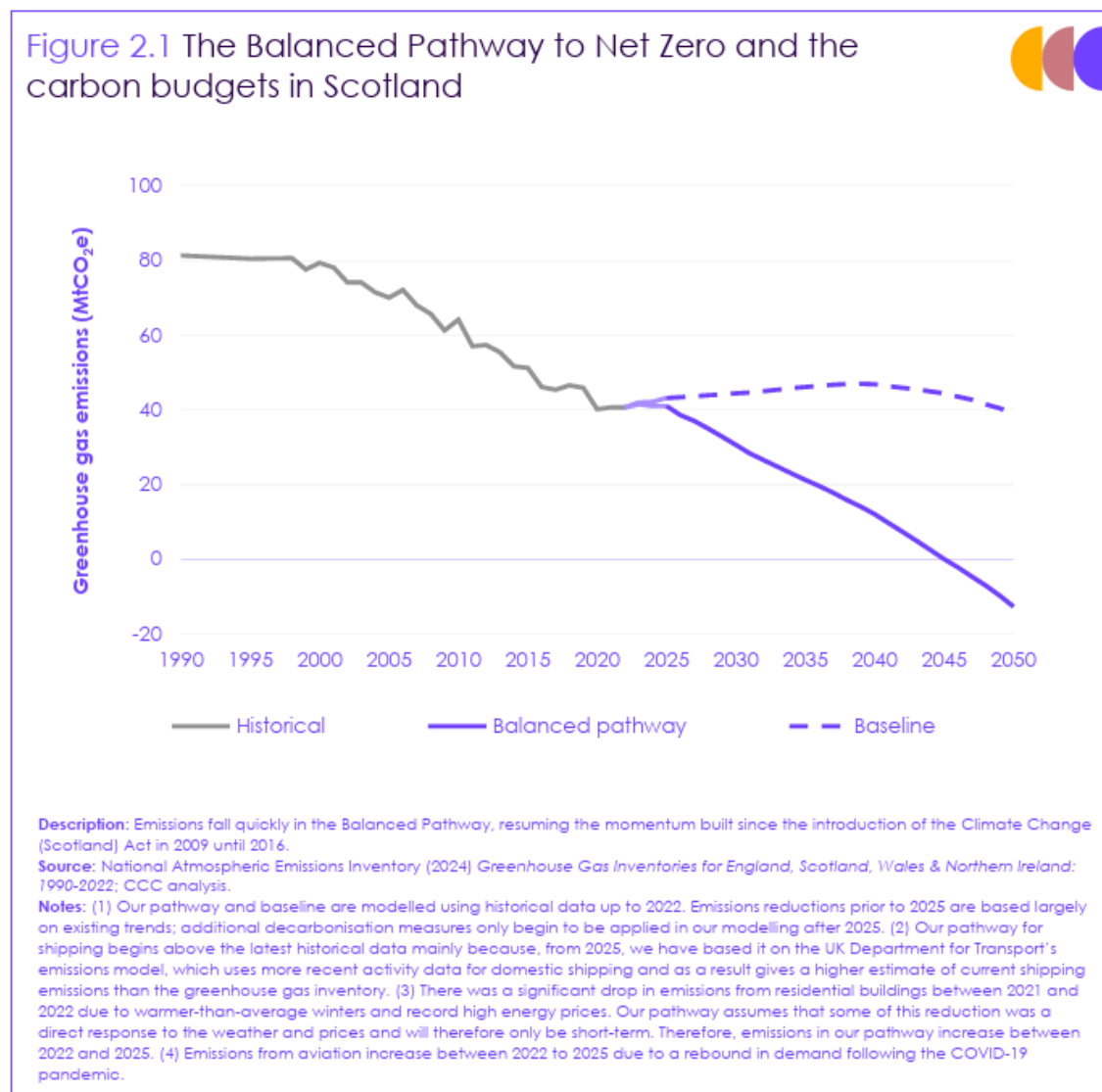
What a ‘good’ CCP would look like

45. To support the Parliament's scrutiny of the draft CCP, in February 2025, the NZET Committee wrote to the CCC, Audit Scotland, Environmental Standards Scotland, and the Scottish Fiscal Commission to ask them to set out what a ‘good’ CCP would look like. Their full responses are linked below:
- [Climate Change Committee response](#)
 - [Audit Scotland response](#)
 - [Environmental Standards Scotland response](#)
 - [Scottish Fiscal Commission response](#)
46. The [Committee shared a SPICe summary and the full responses with the Acting Cabinet Secretary in April 2025](#), and encouraged the Government to consider this advice and engage with these bodies in preparing the draft CCP.

Background on Scotland's progress in cutting emissions

47. On the '[GHG Account](#)' basis, on which performance against the legislated Scottish targets is assessed, emissions in 2023 were 51.3% lower than baseline levels.¹⁰

Scotland's emissions (1990-2022) and the 'balanced pathway' to net zero



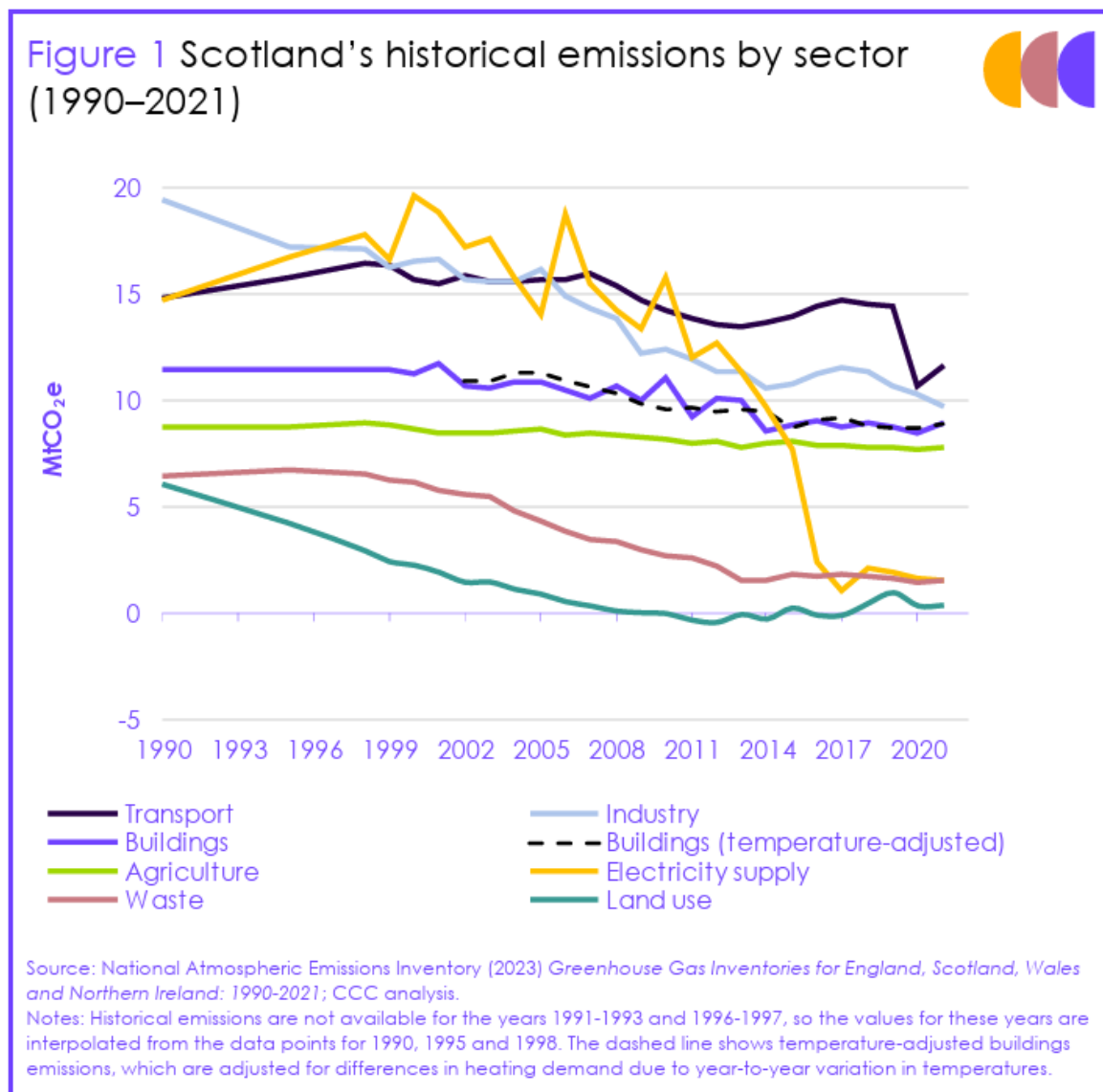
Source: CCC. [Scotland's Carbon Budgets. Advice to the Scottish Government](#). May 2025

48. Since 1990, the [electricity supply sector has contributed the most to emissions reductions in Scotland](#), driven by the phase-out of coal and the growth of renewable energy. Significant reductions have also been seen in the industry,

¹⁰ The baseline against which targets are assessed is 1990 emissions for all sectors except F-gases, for which 1995 is used.

waste, and land use sectors. Emissions reductions in other sectors have been modest (see Scotland's historical emissions by sector).

Scotland's historical emissions by sector (1990-2021)



Source: CCC. [Progress in reducing emissions in Scotland. 2023 Report](#)

49. The most significant sources of emissions in Scotland currently are Transport, Industry, Buildings and Agriculture (see Table of emissions by sector).

Table of emissions by sector (from Scottish GHG Statistics 2023)

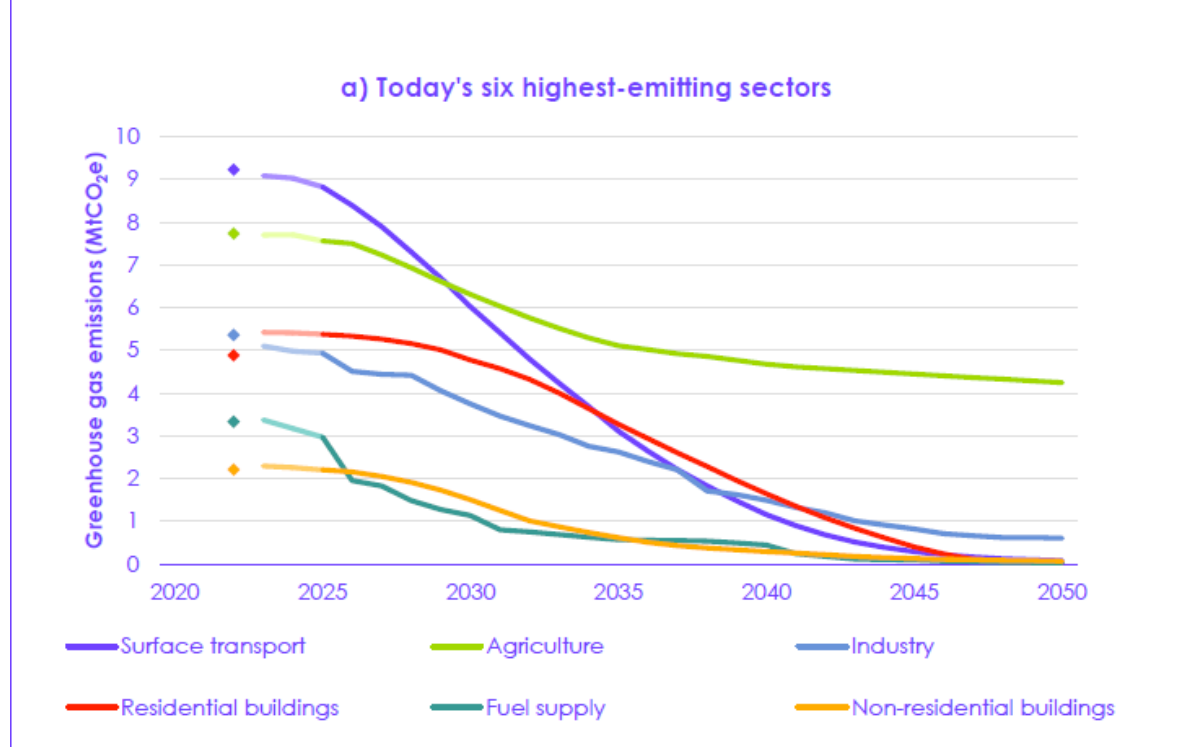
Sector	% share of 1990 emissions	% share of 2023 emissions
Electricity	18%	3%
Transport (including international aviation & shipping)	19%	33%
Agriculture	11%	19%
Buildings	14%	19%
Industry	24%	20%
Waste	8%	4%
Land use, land use change and forestry (LULUCF)	7%	1%

Source: Annex B, [Scottish GHG Statistics 2023](#)

50. The sectoral emission reductions modelled in the CCC Balanced pathways in their Scotland Carbon Budget advice are set out below.

Sectoral emissions in the CCC Balanced Pathway

Figure 3.1 Sectoral emissions in the Balanced Pathway in Scotland



Source: CCC. [Scotland Carbon Budgets advice](#).

Niall Kerr and Abbi Hobbs, SPICe Research
12 September 2025

Note: Committee briefing papers are provided by SPICe for the use of Scottish Parliament committees and clerking staff. They provide focused information or respond to specific questions or areas of interest to committees and are not intended to offer comprehensive coverage of a subject area.

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