

Lorna Slater MSP Minister for Green Skills, Circular Economy and Biodiversity Scottish Government

By email only

Net Zero, Energy and Transport
Committee
c/o Clerk to the Committee
Room T3.40
The Scottish Parliament
Edinburgh

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EH99 1SP

Dear Lorna

Draft Biodiversity Delivery Plan

I <u>wrote to you</u> in September 2022, setting out the Committee's views on the Scottish Government proposed new Biodiversity Strategy, then under consultation. The letter noted that the Strategy was being proposed in the context of a human-made biodiversity crisis of habitat loss and disturbance, exacerbated by climate change, and that this called for bold action at global, national and local level.

In summing up the Committee's views of the draft Strategy, I said it was—

"... a good start but must contain more specific targets. It must also be accompanied by robust delivery plans which detail of how they will differ from past approaches that have not worked as they should. Finally, a future Natural Environment Bill must provide legal back-up for commitments made in the strategy, include legal mechanisms to address delivery failures."

To this end, the Committee undertook to take further evidence on what turned out to be a single Delivery Plan once it was published as a draft for consultation. We held two evidence sessions in December and January themed around respectively the marine and terrestrial environments, supplemented by written evidence from some witnesses and other stakeholders. In the short time available, we nonetheless heard from a diverse mix of interests, and are grateful to everyone who contributed.¹

The Committee also welcomed the contribution of two Members of the Rural Affairs and Islands Committee to our two sessions, posing questions that reflected the priorities and experiences of that committee. This working together sets a small

¹ Links to Official Reports of the two evidence sessions and to relevant written evidence here: Scottish Biodiversity Strategy | Scottish Parliament Website

example of how the biodiversity crisis calls for a multidisciplinary response, avoiding siloed approaches.

Formally, this letter represents the views of the NZET Committee alone and it also includes references to additional evidence we took on 30 January on the Scottish Budget 2024-25 from the Scottish Government. In the attached annexe, we set out our conclusions and recommendations, structured around the six main high-level objectives set out in Strategy and the draft Delivery Plan. Whilst we ask you to treat this as a response to the Scottish Government consultation on the draft Plan, we also request a written response from you to our main conclusions and recommendations.

One of two main themes of our evidence was that, while there is much that is good and useful in the current draft, it is not the plan for *delivery* of strategic objectives most stakeholders expected and wanted it to be. instead, it had the flavour of being an interim "holding" document. We agree: **our over-riding recommendation is that we do not consider the draft has got right the balance between being high level and flexible and being delivery-focussed, especially in the context of what has rightly been labelled an emergency. There must be a stronger focus on specific concrete actions, and on who is to take the lead on them.**

The final Plan must therefore have more targets and goals that are truly SMART – specific, measurable, achievable, relevant and time-bound. Our second crosscutting definition is that this calls for further and deeper consultation and codesign with key stakeholders: farmers and land managers, the fishing, aquaculture and offshore renewables sectors, academic experts, statutory bodies, and environmentalists, to help set those SMART targets. Being more delivery-focussed also means using spatial mapping to demarcate interests and interventions, whether that is in the Plan itself or in companion documentation.

The other main theme emerging from evidence was that the ambitious rhetoric about tackling biodiversity loss that has emanated from government during the devolution era has too often not produced real change. Whilst there have been some success stories, the crisis in Scotland has in many respects got worse not better; something the draft Strategy itself acknowledges. In one area where Scotland is of global ecological importance: our populations of North Atlantic pelagic bird species, there have been especially worrying indicators of decline in recent years.

Given this, the Committee's priority in its biodiversity scrutiny over the rest of this session will be on *outcomes*: asking which interventions have made a positive difference and which have not, and what we can learn from this. To that end, and as one of several actions on this topic, we look forward to assessing the effectiveness of biodiversity policy with you at future Committee meetings. One of the questions we are likely to pose is how the Scottish Government is measuring outcomes. There is an opportunity for this to be set out in more detail in the finalised Delivery Plan.

Yours sincerely,

Edward Mountain MSP

Edward Mantain,

Convener

Net Zero, Energy and Transport Committee

Annexe: NZET Committee views on the draft Biodiversity Delivery Strategy

Objective 1: accelerate restoration and regeneration

Objective 2 - Protect nature on land and at sea, across and beyond protected areas (includes comments on 30 by 30 and Nature Networks)

These two objectives are being taken together as much of the evidence relevant to them overlapped.

Stakeholders welcomed the clear statement of intent set out in both objectives: that extensive ecosystem recovery is the first priority of Scottish biodiversity policy, and that the Scottish Government is committed to protecting and extending its network of protected areas and to achieve the Global Biodiversity Framework's "30 by 30" goal.² However, most did not think the draft provided a clear blueprint for how these aims would be achieved.³

One of the main issues raised in evidence was the need for spatial approaches and tools, such as opportunity mapping, mapping of priority areas for restoration or prioritisation of regional habitats, whether set out in the final Plan or in companion documentation. It would support the process of identifying priority areas for habitat restoration or increased protection, and could be used to support engagement in these processes, nationally or locally. It so doing, it would guide resource allocation and provide more certainty to a range of stakeholders including energy companies and other potential private sector investors. It is also an obvious prerequisite to achieving 30 by 30.

Stakeholders said that much of this work had already been done and it was partly a question of drawing it together. We heard that, where this work was incomplete, the tools and expertise were there, although we note a difference of views on whether marine data collection is sufficiently extensive and granular to enable informed decisions in relation to mapping or other matters.⁶

Marine stakeholders said that spatial mapping would be needed to develop the second National Marine Plan. It is through marine planning that there is the best chance of amicably and fairly resolving competition for use, or indeed non-use, of the sea and mitigating "spatial squeeze". We also heard that marine spatial mapping would be necessary to ensure that Strategic Environmental Assessment and Business and Regulatory Impact Assessments are robust. The Scottish Wildlife

² Parties to the 15th Conference of Parties to the UN Convention on Biological Diversity (COP15), which included the UK, agreed to adopt of the Kunming-Montreal Global Biodiversity Framework. One of its headline requirements is that signatories commit to securing that 30% of their land and sea territory is protected for nature.

³ Written submission from Royal Town Planning Institute (RTPI); Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 9 (National Farmers Union Scotland).

⁴ Written submissions from <u>RTPI</u> and <u>Royal Society for the Protection of Birds</u> (RSPB); Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, col 15 (National Farmers Union Scotland) and cols 9-10 (RSPB).

⁵ Written submissions from <u>Scottish and Southern Electricity Networks</u> (SSEN), <u>Marine Conservation</u> Society (MCS), and RSPB.

⁶ Written submissions from MCS, <u>Salmon Scotland</u>, <u>Scottish Fishermen's Federation</u> (SFF), and <u>Open Seas Trust</u>.

⁷ Written submissions from MCS, Salmon Scotland, and SSEN.

⁸ Written submission from Salmon Scotland.

Trust referred to the tool of "opportunity mapping," defined as using "geographic information system tools to work out where your biodiverse green spaces are and what opportunities there are to link them up in the easiest way that also provides multiple benefits."

RTPI Scotland said the Plan needed to be more addressed to urban as well as rural and marine environments, to address areas of our towns and cities that are "nature deficient", and the socioeconomic consequences flowing from this. Community Land Scotland highlighted how small-scale interventions and community-led projects and community engagement can not only help meet biodiversity objectives but also to support health and wellbeing and local regeneration and address issues around vacant and derelict land. The role of nature networks in making biodiversity actions accessible to local people were highlighted.

In relation to protecting particular areas, witnesses brought up the "plethora" ¹⁰ of land-based planning tools, structures and designations including nature networks, regional land use partnerships and the overall land use strategy and river basin management plans. They said there was a need to bring these together strategically. ¹¹ For instance, the Scottish Wildlife Trust called for a national ecological or nature network to set priorities, informed by spatial prioritisation. They said this approach would also help local authorities, which need more guidance in developing effective nature networks.

Whilst the 30 by 30 target is broadly welcomed, it is clear this could lead to decisions impacting current uses of land or sea. This can raise sectoral and local concerns, as was illustrated when proposals for Highly Protected Marine Areas were put forward earlier in this Parliamentary Session. We heard of a need for more clarity on what the target means for land managers.¹²

In the marine environment, environmental stakeholders criticised the pace of delivery in key areas such as agreeing management measures for inshore and offshore Marine Protected Areas. ¹³ Continued trawling within MPAs was highlighted as an issue. ¹⁴ The majority of MPAs having no management made them open to criticism for being 'paper parks'. ¹⁵

The Marine Conservation Society said it was a requirement of the Global Biodiversity Framework that signatories set out areas where extractive activities are prohibited. ¹⁶ Open Seas highlighted that the Scottish Government had committed to consult after summer 2023 on replacement measures for HPMAs, but that this was still being awaited. ¹⁷

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⁹ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 25.

¹⁰ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, col 21 (Scottish Wildlife Trust).

¹¹ Written submission from <u>Scottish Land and Estates</u> (SLE); Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, col 10 (RTPI).

¹² Written submission from SLE.

¹³ Written submission from RSPB.

¹⁴ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 12 December 2023, col 22 (Open Seas Trust).

¹⁵ Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, col 24 (MCS).

¹⁶ Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, col 24.

¹⁷ Written submission from Open Seas Trust.

We raised the issue of national parks with witnesses during the terrestrial environment session, noting the likelihood of a third national park being proposed in the near future. Community Land Scotland thought the two existing national parks had provided a number of good examples of effective community engagement to promote biodiversity, whereas the RSPB felt neither had made ecosystem restoration a sufficiently high priority. We expect to revisit this issue in more depth later in this Parliamentary session.

Conclusions and recommendations

- 1. The Committee supports calls for urgent progress with spatial approaches to restore and protect biodiversity and of protected areas, on a nationwide basis (including marine mapping). Whether this leads to maps being set out in the finalised Delivery Plan or in some other documentation is less important than ensuring this work proceeds at pace, in line with the urgent nature of the biodiversity crisis.
- 2. The Committee does not envisage the act of mapping being in itself a determinative decision-making process, but rather a process of setting parameters and priorities, and showing what this is likely to mean in spatial terms. The aim should be to create far greater certainty but to leave space for consultation, discussion and co-design at a local level so that communities feel part of the process.
- 3. In relation to the marine environment one such vehicle for this work at local level would be Marine Planning Partnerships. The Committee notes the delay in the Scottish Government responding to our predecessor committee's <u>report on regional marine planning</u>. The <u>response stated</u> that existing MPPs will be supported to progress their plans, but that no new partnerships or plans will be progressed (other than potentially in the Western Isles) until after the second National Marine Plan is finalised. Regional marine planning is an example of a gap between ambition and delivery in relation to biodiversity policy: it is a structure created by legislation well over a decade ago that still awaits comprehensive implementation.
- 4. Part of delivery at marine level should also include prioritising agreement of management measures in inshore and offshore Marine Protected Areas. Significant delays in this area risk creating significant bottlenecks in marine environment policy implementation.
- 5. The Committee supports the ambition of achieving 30 by 30 in the scale of protected areas. Management of these areas needs to be effective and enforced, and areas need to be ecologically connected, for example, through considering how existing protected areas in the terrestrial environment are more widely connected through nature networks or tools such as wildlife corridors".
- 6. Strategic thinking is also needed on how the range of tools at the Scottish Government's disposal for the terrestrial environment including various types of designation, regional land use planning, nature networks, local place plans under the planning system, etc- can be best used to create an ecologically coherent network at a national level,

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¹⁸ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, cols 21-22 (RSPB).

which also coheres with other land management goals, in particular net zero and food security.

Objective 3 - Embed nature positive farming, fishing and forestry

Stakeholders welcomed the intention behind this objective. But there were concerns about policy uncertainty in multiple areas that some stakeholders said had created a 'wait and see' mentality, particularly in an atmosphere of policy uncertainty following Brexit.¹⁹ This was an area where having more SMART targets in the Delivery Plan was seen as especially necessary.²⁰

The National Farmers Union Scotland said that, overall, there was a "busy policy, strategy and legislation landscape" which had left farmers uncertain. They called for a commercial 'de-risking' of nature-friendly farming activities.²¹ Stakeholders also commented on the importance of ensuring that goals and incentives cohered. The RSPB gave the example of "a lack of support for the incredibly high-nature-value farming in the west, particularly on the isles, in relation to the extensive cattle-based crofting system, which delivers globally significant biodiversity benefits." They called for "the proper levels of support that reflect the public benefits that they deliver."²²

Stakeholders discussed aquaculture and its implications for biodiversity including the significance of siting and spatial planning, and SEPA's new sea lice assessment framework. As noted earlier, whilst there was agreement that the marine environment posed greater challenges for data-gathering than the terrestrial environment, there was a difference of views between conservations and the fishing and salmon-farming sector as to whether we had enough robust data to make sufficiently informed decision about conservation measures in the marine environment.²³

Evidence we took from the Scottish Government on 30 January on woodland grant and agri-environment funding, and on peatland restoration, is relevant under this heading, but is considered under Objective 5 below.

Conclusions and recommendations

- 7. The Delivery Plan is an opportunity to bring together different strands of relevant Scottish Government policy in relation to agriculture, forestry, aquaculture and fisheries and work to align them with biodiversity goals. This must include ensuring appropriate incentives and rewards are in place to ensure a "just transition" in rural, coastal and island communities that is economically viable, and meets the needs of people living there, and also addresses the biodiversity crisis. In furtherance of this, more SMART targets could be set under this objective.
- 8. We accept that much of the current uncertainty over the future direction of land use policy has been caused by Brexit but are concerned by evidence that this uncertainty may be preventing nature-positive decision-making by farmers and land managers. The Delivery Plan is an

¹⁹ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, cols 16, 38 (NFUS).

²⁰ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 12 December 2023, col 42 (Salmon Scotland, Fidra).

²¹ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, cols 16, 27 (NFUS).

²² Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 28 (RSPB).

²³ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 12 December 2023, cols 6, 10-11, 15-16, 24, 38.

- opportunity to identify new means of incentivising farmers and land managers and trial new approaches that do not require primary legislation.
- 9. If legal changes are required to realise this ambition, we call on the Scottish Government to make use of the opportunities afforded by the current Agriculture and Rural Communities Bill and legislation expected later this session on the natural environment.
- 10. The Scottish Government should also consider how the aims outlined in its new <u>Vision for Sustainable Aquaculture</u> should be integrated into the Delivery Plan to ensure they cohere with the Biodiversity Strategy.
- 11. The Delivery Plan must also provide more detail on how those with important regulatory or enforcement powers (for instance local authorities in relation to aquaculture siting or SEPA for sea lice assessment) are to be supported in these key roles. Our report on local government and net zero recommended the Scottish Government set up a net zero "intelligence unit" to assist councils in their net zero goals: a recommendation that the Scottish Government largely accepted. A similar approach could be considered in relation to local government and biodiversity.

Objective 4 - Protect and support the recovery of vulnerable and important species and habitats

Stakeholders highlighted the importance of this objective in the context particularly of Scotland's internationally important seabird populations and worrying recent data about the instability of some populations.²⁴ Avian flu outbreaks are a component of population declines but other factors are clearly at work. In this context, they noted the delay in bringing forward a seabird conservation strategy.²⁵ We note that the draft Plan commits to publish this by 2025.

RSPB Scotland welcomed the species at risk initiative but said "we have a long way to go" and emphasised the importance of species recovery in conjunction with ecosystem-wide restoration work.²⁶

NFUS supported a review of species licensing and noted a lack of tools for managing "conflict species", arguing this can negatively impact biodiversity. They also highlighted the need for compensation and management measures for losses.²⁷ We note RSPB Scotland's evidence that it has offered to make land available for translocating beavers that are causing a problem elsewhere.²⁸

Conclusions and recommendations

12. This is another objective in relation to which we consider the plan should set far more SMART targets. Those targets that do exist often lack specificity and measurability (e.g. "Undertake measures to reduce human pressures...") or a clear indication of who is to lead on them. Timeframes are often lacking (eg", continue to support and build upon

²⁶ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 31.

²⁴ Net Zero, Energy and Transport Committee, <u>Official Report</u>, 12 December 2023, col 7, (Open Seas Trust), col 15 (MCS), col 30 (RSPB).

²⁵ Written submission from MCS.

²⁷ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 32.

²⁸ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 33.

- existing strategies and schemes to protect and expand populations of species such as capercaillie, red squirrel, sea eagle, golden eagle and Eurasian beaver")
- 13. We acknowledge that species management and species reintroduction and translocation programmes can raise conflicting interests with other land management objectives e.g. farming. This underlines the importance of meaningful consultation and where possible co-design, including at local level, prior to delivery.

Objective 5 - Invest in Nature

The draft Plan states undertakes to "Develop with partners and stakeholders a Biodiversity Investment Plan. This will set out the strategic priorities for public investment through the Nature Restoration Fund and other public funds and where we can deliver best value for money." The Scottish Wildlife Trust was amongst those to raise concerns about the scope of this plan, saying it should not only be about the nature restoration fund, but a range of potential funding sources including blended private and public finance.²⁹

Many of the points noted earlier about the importance of incentivising, rewarding and de-risking nature-positive agriculture and marine management are also relevant under this heading.

A number of stakeholders raised concerns about the need for robust regulation of "green finance" to avoid "greenwashing" and perverse incentives.³⁰ Community Land Scotland said policy in this area had ended up at times "socialising risk but privatising reward".³¹

Stakeholders also noted a disconnect in policy in addressing root causes. For instance, help from the Nature Restoration Fund to restore inshore environments was welcomed, but this did not appear to square with a perceived lack of resources to ensure robust regulation of the marine environment and prevent pollution.³² Open Seas called for more clarity on the Marine Fund Scotland role in tackling biodiversity crisis, in terms of how projects are screened or prioritised for nature positive impact.³³

A lack of continuity of funding was also cited as cutting against long-term goals, For instance, the Scottish Fisherman's Federation highlighted the short-term nature of funding to help the sector provide useful data on stocks.³⁴

Agri-environmental measures' in the budget fund grants for farmers to carry out activities which benefit biodiversity and the environment. This funding scheme is facing a 17.6% cut in 2024-25. In the Committee's <u>session with terrestrial biodiversity stakeholders on 9 January 2024</u>, NFUS emphasised that there are many demands on farmers to deliver biodiversity and climate benefits from land – but this needs to be supported. In addition, The woodland grants element of the budget is being cut by

²⁹ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 35.

³⁰ Written submission from <u>SWT</u>; Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, col 36 (RSPB) and cols 37-38 (NFUS).

³¹ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 43.

³² Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, col 20 (MCS).

³³ Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, col 34.

³⁴ Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, cols 11-12.

41.2% in the coming year. The Cabinet Secretary for Rural Affairs, Land Reform and Islands was clear in her evidence on the budget that the reduction in woodland grants would have an impact but, in relation to agri-environment, her expectation was that the Scottish Government could meet demand with the reduced budget.³⁵

Given known issues with scaling up peatland restoration, the Committee has been interested in how much peatland funding has been spent. After giving evidence to the Committee in October 2023, NatureScot confirmed in correspondence that around £40m of the committed £250m has been spent in the three-year period 2020/21 to 2022/23. Relatedly, the Scottish Government noted in its pre-budget letter to the Committee that underspends are often used on similar projects, but that this depends on other Scottish Government financial commitments. However, on 30 January, the Cabinet Secretary told the Committee that underspends in the peatland restoration budget have reduced year on year.

Conclusions and recommendations

- 14. The Committee expects the Biodiversity Investment Plan to be a significant document. This should not preclude the Delivery Plan setting out key principles for public and private investment in biodiversity, based on core principles such as promoting integrity, continuity and certainty,
- 15. The Biodiversity Investment Plan should identify *all* main potential sources of public funding which can or should support biodiversity delivery, not just 'specialist' biodiversity funds like the Nature Restoration Fund.
- 16. The Biodiversity Investment Plan should also address sources of private or blended finance, and both the potential risks and the potential benefits of that type of funding.
- 17. The Scottish Government should consider how public finance as a whole pulls towards nature goals for example considering the conditionality of public funding in relation to how projects or organisations deliver on biodiversity or prevent harm. This would be in keeping with the Global Biodiversity Framework.
- 18. The Committee recognises that the Scottish Government has had to make some difficult budgetary decisions for the 2024-25 financial year, including making significant cuts to some funds that have been used to promote biodiversity. Relative certainty and continuity of public funding for habitat restoration is crucial; to give confidence that particular sectors are well-supported over the long-term and that they can support fulfilling livelihoods. This in turn encourages private investment in those sectors. The ambitions set out in the Biodiversity Strategy and Delivery Plan will not be met if they do not broadly cohere with decisions taken in each annual budget round.

Objective 6 - Take action on the indirect drivers of biodiversity loss

Evidence referred to earlier about the need for Scottish Government policies in other areas to cohere with biodiversity policy are also relevant in relation to this objective. Some stakeholders said more "green jobs" or training would help. For instance, RSPB Scotland said "We could have training for ecosystem restoration contractors,

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³⁵ Net Zero, Energy and Transport Committee, Official Report, 30 January 2024, cols 13-15.

invasive non-native species control contractors and experts, and for biodiversity monitoring."³⁶ They said there was enormous scope for this but that it was not signalled in the delivery plan.

In work earlier in this session, the Committee has noted the central role of the planning system in addressing the twin climate and biodiversity planning crises. The Committee and others have welcomed this being expressly recognised and prioritised in the <u>fourth National Planning Framework</u> (NPF4). However, we have also expressed concerns about a lack of recruitment into the profession, and the risk of a growing expertise gap, as planners are increasingly asked to become more knowledgeable in specialist areas, including ecology, and this was again raised in evidence on the Plan.³⁷

The RTPI Scotland noted that thinking about the biodiversity impact of development should not stop once the development is completed. They said this needed to continue in the post-construction phase, as the development settled into being used or lived in. The RTPI also talked about the importance of impactful dialogue to explain why nature-based interventions were needed, and to share best practice.³⁸

Fidra, which campaigns on marine pollution said there was a lack of attention paid to the impact of chemical and plastic pollution and that in Scotland the chemicals investigation programme has not been as extensive as it has in other parts of the United Kingdom.³⁹

Conclusions and recommendations

- 19. There is a ministerial-level net zero champion within the Scottish Government Committee, with a roving brief to ensure government is pulling in the same direction on climate change. They are accountable to the Scottish Parliament in this role. The Committee calls on the Scottish Government to consider creating similarly visible role in relation to the biodiversity crisis
- 20. We also call on the Scottish Government to use the opportunity of finalising the Strategy and Delivery Plan to carry out increased public engagement on the biodiversity crisis and proposed responses to it.
- 21. A number of local fora have been developed to allow for community dialogue on natural resource use and nature restoration but have not been fully rolled out and implemented, and doubts have been expressed as to whether they are resourced sufficiently to fully carry out their role. These include Marine Planning Partnerships, local nature networks, regional land use partnerships, etc. These are an obvious way to engage local communities and sectors on the ground. The Plan should set out how these will be utilised.

³⁶ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, col 15.

³⁷ Written submission from <u>RTPI</u>; Net Zero, Energy and Transport Committee, <u>Official Report</u>, 9 January 2024, col 24 (SWT).

³⁸ Net Zero, Energy and Transport Committee, Official Report, 9 January 2024, cols 39-40.

³⁹ Net Zero, Energy and Transport Committee, Official Report, 12 December 2023, col 21, 36.