Climate Action Committee

Correspondence from SEPA, Thursday 10 September 2026

Organisational priorities across Session 7

1. What do you see as the priority areas which this Committee should focus on this session to have the most impact?

As outlined in our written evidence to the Committee Submission from SEPA on priorities within the Committee's remit. We suggest that the Climate Action Committee could prioritise:

1. **Public Service Reform and Place-Based Environmental Action** - Environmental challenges do not follow organisational boundaries. They require co-ordinated action across public bodies and sectors. In its announcement in the Programme for Government (PfG), the Scottish Government is proposing to create a single overarching environmental body for Scotland as part of wider public sector reform intended to strengthen service delivery and deliver more impactful environmental outcomes. As this proposal progresses the Committee will have no doubt wish to scrutinise plans for its establishment, functions and responsibilities as they may impact matters under the Committee's remit.

2. **Net Zero Delivery and Green Economic Growth -** The challenge is now less about developing new policy and more about ensuring delivery at the pace and scale required to meet Scotland's climate targets. Committee scrutiny will be important to assess whether government, regulators and industry are taking sufficient action to reduce emissions across key sectors while supporting economic competitiveness and investment.

3. **Climate adaptation, flooding and water resilience** - With over 600,000 properties projected to be at risk of flooding by 2100, and a changing climate increasing the frequency, duration and severity of droughts, Scotland faces significant and growing water resilience challenges. Scrutiny would help to ensure Scotland is adequately prepared for and adapted to the impacts of climate change. The Committee could play a key role in examining whether adaptation measures, delivery mechanisms, long-term investment and resilience planning are keeping pace with growing risks and that public service reform drives the necessary alignment.

4. **Nature recovery and biodiversity restoration -** Scotland remains one of the most nature-depleted countries in Europe, and continuing biodiversity loss threatens ecosystem services that support communities, food production, flood management and carbon storage. Committee scrutiny of the development and delivery of biodiversity targets under the Natural Environment (Scotland) Act 2026 will be important to ensure they are sufficiently ambitious, measurable and capable of reversing Scotland's decline in biodiversity.

5. **Circular economy and waste reform -** The transition to a circular economy is essential for reducing emissions, increasing resource security and creating economic opportunities. Scrutiny of the implementation of the Circular Economy (Scotland) Act will help ensure major reforms - including Digital Waste Tracking and Extended Producer Responsibility schemes - improve resource efficiency.

6. **Effective environmental regulation and enforcement -** SEPA's evidence highlights the need for a regulatory system that both protects communities and enables innovation. We welcome the Committee considering how a more enabling approach to regulation can support Scotland's transition to a low-carbon, circular economy while continuing to safeguard the environment and communities.

2. In particular where do you think engagement by the Climate Action Committee could help to enhance public participation and awareness?

The Committee can play an important role in enhancing public participation and awareness by helping to create an inclusive national conversation about Scotland's transition to net zero and climate resilience. It is important that climate discussions engage people from all communities and backgrounds, including those who may feel disconnected from climate policy or concerned about the impacts of change on their livelihoods, household costs or local communities.

A just transition requires people to see both the necessity of action and the opportunities it can create, while ensuring that the costs and benefits of transition are shared fairly and that no community is left behind.

The Committee could also help promote a collective understanding of the challenges Scotland faces, not only in reducing emissions but in adapting to the impacts of a changing climate that are already being experienced through flooding, water scarcity and other climate-related risks. Building public awareness of resilience and adaptation will become increasingly important alongside discussions on emissions reduction.

In terms of engagement mechanisms, there may also be opportunities to involve people earlier and more meaningfully in the development of major policy frameworks such as the Climate Change Plan and Scotland's National Adaptation Plan.

The Committee may also be aware of the National Emergency Briefing UK-wide campaign to support public awareness and preparedness in relation to climate and nature risks. This briefing was provided to all UK MPs in November 2025.

Pre-budget scrutiny

3. What implications do the commitments in the Programme for Government have on your resource needs for the 2027-28 Scottish Budget, and what do you expect your key financial challenges to be in the next financial year?

The commitments set out in the Programme for Government 2026-31 are broadly aligned with SEPA's strategic priorities, including climate resilience, environmental protection, circular economy delivery, digital transformation and regulatory reform. SEPA has been self-funding transformation for the past three years from one-off savings and pivoting business as usual funding to deliver our transformation and we are closely aligned to the principles set out in the PfG.

For 2027/28, funding will need to be determined for new duties. Examples include: extended producer responsibility, the Deposit Return Scheme and waste tracking. We have also introduced new services such as water scarcity forecasting and advance flood warning. Financial challenges from yet to be agreed pay inflation also factor.

In 2027/28, we will clearly also need to consider arrangements for the proposed new body as more details become available. SEPA recognises the very challenging fiscal landscape and will continue to work with Scottish Government within our allocated resources and our external charges generated.

Specific policy areas and forthcoming policy milestones

4. The Scottish Government has indicated that it is not expecting statutory nature targets to be introduced within the next year. What are your views on the proposed timescales?

SEPA is a member of the Scottish Biodiversity Strategy Programme Advisory Group (SBS PAG) and, as such, has been involved in the development of the PAG recommendations on the statutory nature targets. We are, therefore, aware of the various areas of development that are required for the targets, in some cases dependent on outputs from the Scottish Government Rural and Environment Science and Analytical Services (RESAS) research programme. Accordingly, we are aware that producing the full set of statutory targets within the next year would be challenging.

5. What engagement will your organisation expect to have in the development of statutory nature targets?

As a member of the SBS PAG, SEPA has been involved in the development of the PAG recommendations on the statutory nature targets. In addition, SEPA has senior representation on the Biodiversity Portfolio Board for the Scottish Biodiversity Strategy and is able to contribute perspectives on the development of the statutory biodiversity targets.

6. What are your views on progress, and the anticipated timescales for action and delivery, of Ministerial duties under the Circular Economy (Scotland) Act 2024 to set targets for a circular economy and to produce a statutory code of practice on household recycling?

SEPA is supporting the Scottish Government and RESAS in the development of statutory circular economy targets. We understand this work is progressing to the timetable established by the Scottish Government, with the intention of bringing forward statutory targets in 2027.

Our principal role has been to provide practical and technical advice, particularly on the availability, quality and suitability of data that could be used to establish baselines and subsequently monitor progress. We consider it important that the eventual targets are meaningful, supported by robust data and capable of being measured consistently over time.

SEPA has a more limited role in relation to the statutory Code of Practice on household waste recycling. The design and delivery of household waste collection and recycling services are functions of local authorities and are not regulated by SEPA. The detailed development of the Code is being taken forward by the Scottish Government with local government and Zero Waste Scotland.

We will continue to engage where our regulatory, environmental or waste data expertise can usefully inform either process.

7. How are you working with other organisations to tackle these pollutants such as 'forever chemicals', microplastics and sewage-related contaminants in drinking water and water bodies and their upstream sources?

The chemicals regulatory landscape in the UK and the EU is complex, with some chemical substances regulated by use type – such as the Plant Protection Products Regulations - and others regulated by broader regulations - such as UK REACH.

Chemicals regulations aim to control and restrict the use of chemicals considered to be of most concern. Many of the traditional controls available to SEPA are at the point of discharge e.g. by requiring treatment of sewage. However, such measures can be technically challenging, expensive and carbon intensive. There are often alternative ‘at source’ interventions - such as replacement with more sustainable alternatives - that could be put in place.

Our work on a range of pollutants is set out in Annex 1.

8. What are the key obstacles to progress on water and climate resilience within the current legislative framework?

Resilience

As we noted in our written evidence to the Committee of 31 August 2026, the impacts of a changing climate are becoming increasingly visible. As a nation, an important part of climate adaptation is to plan for this. Wetter winters, hotter and drier summers, more extreme rainfall events and increasing weather volatility are already affecting communities, public services and economic activity.

Demands on SEPA’s vital flooding and drought services will also increase as climate risks intensify, putting greater pressure on our resources. Responding effectively requires more than reactive, site-by-site and event by event responses. It demands a long-term shift towards prevention, resilience and place-based adaptation.

Nature based solutions are an important part of adaptation picture, offering multiple co-benefits. We need scale up the place-based approaches that allow us to integrate how we manage our land and water. Actions in one part of a catchment, can affect

the water availability, quality and flood risk in another. Because water is essential to many aspects of land management and economic development, catchments provide an ideal scale to apply a place based, people centred approach.

A further consideration is the need to understand the extent to which existing resilience measures, including flood protection schemes and Sustainable Drainage Systems (SuDS), will continue to perform under future climate conditions. There is limited information on the cumulative resilience these measures provide, where protection standards may decline as climate risks increase, and where further adaptation action will be required to maintain resilience over time. Current legislative and policy frameworks place greater emphasis on delivery of new measures rather than long term monitoring, evaluation, adaptation needs and performance of existing measures.

Managing the water environment

Protecting and improving our water environment is vital for the nation's prosperity and the health and wellbeing for all of us. The framework for doing this is set by River Basin Management Plans (RBMP), which identify pressures, targets and actions to achieve environmental objectives.

Since 2009, RBMPs have been successful in protecting and improving the water environment. 67% of Scotland's waterbodies are in good or better condition and this is improving each year. This is the result of concerted action over many years by a range of partners, including Scottish water and the agricultural sector.

Addressing future challenges on the water environment will require new ways of working and coordinated and aligned action across catchments focussed on delivering benefits for the communities within those catchments.

Work on the RBMP4 (2027-33) is already shaping a refreshed approach. This includes consideration of how objectives should evolve to respond to the growing impacts of climate change, changing land uses and emerging pollutants; a renewed emphasis on collaborative delivery across sectors; and a sharper focus on long-term water resource management. This will ensure that water resilience is embedded within the statutory planning framework of RBMP. The consultation on the draft plans will be published in December 2026.

You also undertook to provide the Committee with a list of your duties under the climate change plan.

As a public body we are subject to the Climate Change Duties set out in the Climate Change (Scotland) Act 2009. These place an obligation on SEPA to contribute to delivery of Scotland's climate change targets which in the context of Scotland's Climate Change Plan means supporting achievement of both 5 yearly carbon budgets and ultimately net zero by 2045.

SEPA is primary or secondary named delivery partner for 16 policy proposals as detailed in Annex 3 of the Climate Change Plan. For a full list of delivery proposals that SEPA is involved in see Annex 2.

Beyond these particular actions we appreciate the leading role that we must play as Scotland's environmental regulator to deliver climate mitigation through delivery of our functions. We do this in a range of ways such as delivery of the Water Environment Fund (WEF) where each project is appraised to determine the carbon impact of the project.

We also regulate the UK Emissions Trading Scheme and F Gas use in Scotland and oversee the Energy Savings Opportunities Scheme both of which are intended to reduce the impact that industry in Scotland has on our climate and environment.

We are also reducing our own environmental footprint, having achieved sustained reductions in our own greenhouse gas emissions over many years. We have reduced emissions by 47% since 2014/15. We recognise our role as a leader and exemplar for climate action. By being able to continue to deliver and expand our high-quality services while also reducing emissions demonstrates that transition to a low carbon organisation is possible.

We are currently preparing a plan for how we aim to accelerate our work in delivering the on the public bodies' climate change duties. This will help us to further contribute to delivery of the CCPs objectives and plan how we develop our capacity to tackle and lead on climate change.

Annex 1 – Further information on our work on chemical pollutants

Forever chemicals

Per and polyfluoroalkyl substances (PFAS) are an international issue that requires action across governments, regulators, industry and researchers. While chemicals policy is largely developed at a UK level, environmental monitoring, regulation and enforcement in Scotland is devolved.

The UK PFAS plan (2026) sets out actions which require devolved and UK governments working with regulators. SEPA collaborates with these partners to progress the actions within our remit. These include water quality monitoring, development of standards, and guidance to inform future regulatory approaches.

SEPA have established a PFAS water quality monitoring programme, with the 2025 results providing an early indication of PFAS distribution across Scotland and contributing to a growing UK-wide evidence base supporting the development of future standards, guidance and approaches to managing PFAS.

We are also collaborating with other UK regulators to develop cross-sector guidance for regulators, operators, and industry regulated through environmental permits to reduce emissions of PFAS and improve their handling, monitoring, and disposal.

Sewage related pollutants

Through the third cycle of river basin management plans, Scottish Water is delivering further investments to improve water quality at wastewater treatment works and unsatisfactory combined sewer overflows (CSOs). This work has been focussed on addressing the main impacts from public wastewater on bathing waters and the “good” condition target for Scotland’s water environment.

Across Europe, a recast Urban Wastewater Treatment Directive (UWWTD) has introduced stricter treatment standards for nutrients (amongst other things) and new obligations for monitoring chemicals, microplastics and antimicrobial resistance. SEPA will work with Scottish Government, Scottish Water and other stakeholders to consider the requirements of a recast UWWTD in Scotland.

We have also been working with Scottish Water to understand the concentration of a number of chemicals in sewage discharges and in sludge through the UK Water Industry Research Chemicals Investigation Programme (CIP).

Microplastics

SEPA contribute to the UKWIR project on development of a method for monitoring microplastics in conjunction with Scottish Water and other stakeholders. SEPA continue to keep up to date with microplastic research currently in progress through the CIP and other UKWIR projects. As noted above, a recast UWWTD also introduces new obligations for monitoring chemicals, microplastics and antimicrobial resistance.

Drinking water

The Drinking Water Quality Regulator, Scottish Water and/or local authorities are responsible for drinking water quality in Scotland. SEPA takes into account the location of drinking water supplies when carrying out our regulatory duties such as permitting discharges to the water environment and we engage with local authorities regarding the protection of water supplies from some proposed developments during the planning process.

Pharmaceuticals

Pharmaceutical pollution is an increasing global challenge. Inappropriate use and disposal of medicines can have a major impact on the environment, economy, and human health. The UK Cross-Government Pharmaceuticals in the Environment Group (SEPA are members) is seeking to develop a co-ordinated strategy to reduce the impacts of human and veterinary pharmaceuticals on the environment (biodiversity) and human health. In Scotland, SEPA has taken a collaborative approach to this issue through the One Health Breakthrough Partnership which works to reduce pharmaceutical pollution through innovative upstream approaches (e.g. eco-directed and social prescribing) and improved waste treatment and disposal.

Pet parasiticides

SEPA works with the Veterinary Medicines Directorate, the lead regulatory on pet parasiticides, and other agencies via the Cross-government Pharmaceuticals in the Environment Group which published a roadmap of activities in July 2025 aiming to address levels of fipronil and imidacloprid[1] detected in UK waterways. SEPA have recently published our 2024 water quality monitoring report on concentrations of fipronil and imidacloprid in the water environment in Scotland. This provides supporting evidence to address a finding in the report published by The House of Lords Environment and Climate Change Committee on pet parasite treatments that "substantial evidential gaps" exist around the widespread and intensive use of these medicines in companion animals.

[1] *active substances in veterinary medicines used in flea and tick treatments for cats and dogs*

Annex 2 - Table of policy proposals as detailed in Annex 3 of the Climate Change Plan where SEPA is a primary or secondary named delivery partner

SECTOR Policy/ proposal	Primary Delivery Body	Secondary Delivery Body
WASTE		
Set new Circular Economy targets		√
Develop digital waste tracking service, in partnership with the UK government and other devolved governments.	√	
Develop with stakeholders effective options to implement mandatory reporting for food waste and surplus by businesses.	√	
Delivery of the National Litter and Flytipping Strategy		√
Review of compliance with commercial recycling requirements.	√	
Develop a Residual Waste Plan to 2045.		√
Continue to work with the Scottish Environment Protection Agency (SEPA) and the sector to ensure there is appropriate capacity in Scotland to manage these biodegradable materials and optimise the efficiency of both anaerobic digestion and composting.	√	
ENERGY SUPPLY		
Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS).		√
Incentivise advanced sorting and separating technologies for residual waste (e.g. to separate key recyclable material streams before incineration) where feasible, to be explored through the 2045 residual waste plan, and sector led plan for Energy from Waste (EfW) decarbonisation, as part of wider efforts to end the unnecessary incineration of plastics.		√
BUSINESS AND INDUSTRIAL PROCESS (including NETs)		

Support the Scottish Environment Protection Agency existing regulatory powers to drive energy efficiency across priority sites.	√	
Continue to support the delivery of the Acorn Transport and Storage (T&S) Project and the Scottish Cluster.		√
Continue to support and develop Carbon Capture Utilisation and Storage (CCUS) in Scotland through continued collaboration with the UK Government to create the policy and regulatory frameworks required to support CCUS at scale.		√
Support planning, permitting and consenting processes to ensure they work effectively for the development of carbon capture projects.		√
Undertake development work to increase our understanding of the viability of nearshore carbon storage in Scotland.		√
AGRICULTURE		
By 1st January 2027, as per The Water Environment (Controlled Activities) (Scotland) Amendment Regulations 2021, all Scottish livestock farmers producing slurry must use precision equipment for the application of slurry. We will encourage use of best practice and investigate with industry representatives how compliance with the regulations are monitored and enforced.	√	
LAND USE, LAND USE CHANGE AND FORESTRY		
We will continue work started by the Peatland Expert Advisory Group to improve the tools, guidance and monitoring relating to the design and construction of windfarms on peat.		√