

We welcome the publication of the Draft Climate Change Plan and the opportunity to provide comment. Scottish Water is supportive of the plan, and we welcome the detail provided on the sectoral approaches, the policies that will be developed to deliver the outcomes and the clarity provided in the analytical annexes. These will be helpful as we further develop our decarbonisation pathways.

Scottish Water was pleased to contribute to several technical workshops on aspects of the plan during the consultation period, and our response provides some strategic comments across the plan. We would be pleased to engage further as needed on any of these points.

Leadership and Policy Alignment

The Draft Climate Change Plan identifies the statutory development planning role of the National Planning Framework (NPF) to support low emission development across Scotland. Climate change and carbon are complex and cut across all policy areas and government directorates. Whilst aligning with levers such as NPF is critical, the complex dependencies and interactions between policy areas means that further efforts are needed to ensure policies in one area do not adversely affect emissions in another.

Investing in development, new service provision or to meet new standards can be difficult to achieve without increasing emissions. Policy and regulatory measures are focussed, rightly, on the outcomes sought and may not be able to sufficiently consider the implications to Scotland's emissions pathway. A review across key policy and regulatory measures to promote social, environmental and economic outcomes could identify ways in which statutory outcomes can be met in a zero or low emissions way.

Further consideration could also be given to the role of public bodies in applying regulation. Whilst the regulatory outcome is the primary focus there may be scope to consider the role of public bodies in terms of their statutory climate change duty and the extent to which it applies to the need to consider the way in which policies or regulations could be implemented in a low or zero emission way.

We recognise there are a range of other factors, duties and responsibilities to consider but would suggest that the Public Body Climate Change Duty could be a useful means to promote collective and aligned leadership across the Government's policy agendas and within the agencies and bodies it is directing. Presently this is not referenced in the Climate Change Plan.

Land, Agriculture and Nature

Land management and rural policies are a particular area where there is a need for greater alignment and integration - not just for carbon but for nature and the resilience of the landscape to climate change. The language around the Agriculture and Land Use, Land Use Change and Forestry Sector summaries and infographics could be strengthened in the context of the severe risks from climate change.

From a water perspective most catchments in Scotland are expected to deteriorate in a changing climate. This impacts Scottish Water in a number of ways. For example, water quality in our reservoirs is deteriorating due to higher organic carbon loads from degraded peatland, lower water levels result in higher concentrations of manganese and higher temperatures combined with nutrient loads from

agriculture result in more algae public health challenges. The cumulative impact of deteriorating catchments results in significant pressure on water treatment assets and increased costs (with associated emissions) alongside significant water supply risks. This means that future demands on our water environment from *all sectors* will be difficult to meet. Additional information is available in our [Climate Change Adaptation Plan](#). As such, the critical contribution to resilience and future prosperity across all sectors that peatland restoration, woodland creation and land management for nature, including making space for water, could be more strongly emphasised.

We note the separate sectoral plans for Land Use, Land Use Change and Forestry, and for Agriculture, and the reference to alignment between them. There are good case study examples in the Agriculture section identifying how farming and nature restoration can work, but we need to see these and other nature-based practices strongly incentivised in agricultural policies and payment schemes and implemented at a landscape scale. An estimated 200 drinking water sources are at risk from a range of climate driven impacts including algal blooms, elevated manganese and increased organic matter concentrations by 2050, with over 100 water treatment works operations being classed as vulnerable unless farming practices and land management practices can be aligned to deliver nature restoration (with associated land carbon benefit).

In the Autumn 2025 consultation draft for Scotland's 4th Land Use Strategy, due for publication later in 2026, emissions from land use were included as an indicator only in terms of the emissions from agriculture. With the focus in the Climate Change Plan broader than this we suggest that an indicator that references a net position of carbon losses (e.g. peatland) or gains (e.g. woodland, nature rich habitats) for Scotland's landscape would significantly strengthen the Land Use Strategy, and enable further policy alignment to support a low carbon, climate resilient, nature-rich rural economy, and landscape that is a sink and not a source of carbon.

Pathways and Planning Periods

We support the shift to a longer term pathway to 2040 for the Plan, supported by 5-yearly carbon budgets. Multi-budget period planning to 2040 is critical to establish near term goals and objectives in the context of longer term outcomes, and to review progress and update policies and actions as needed.

Adoption of UK Climate Change Committee Advice – Nitrous Oxide from Wastewater

We note reference is made in the Plan that it is informed by advice from the UK Climate Change Committee. We recognise that much of this advice is reflected in the Plan, however we are disappointed that this does not extend to advice on the need to manage process emissions arising from organic waste and wastewater management.

The Plan does not adequately address pathways to manage nitrous oxide emissions. Nitrous oxide is a problematic emission for the wastewater, waste, and agriculture sectors. Scottish Water (and the wider UK water sector) has identified significant challenges in dealing with these emissions in terms of primary research, innovative technical development, and deployment at scale. We feel this is an area that should receive further attention in the Scottish Climate Change Plan in terms of the need to develop research, innovation and technology platforms for hard to abate emissions across all sectors.

Assumptions and Analytical Approaches

Annex 3 is a helpful resource setting out the basis for the projections, financial and carbon assessments within the plan. Clarity around the assumptions on which the plan is based is important but needs to be kept under continual review. There remain significant uncertainties along this pathway, from the

greening of the grid to the development of zero emission transport technologies and global GHG accounting methods. It is a necessarily technical and further engagement with key sectors would help ensure the assumptions are robust and reflect practical experience.

Consumption, Embodied and Supply Chain Emissions

Whilst we recognise the need for the Plan to focus primarily on Scottish territorial emissions we feel there is a missed opportunities to consider further consumptions emissions – how we decarbonise our supply chains. We support the references to the Circular Economy Strategy and the Product Stewardship initiatives but feel that a focus on the assessment and reporting of embodied carbon within materials within this Plan would further help develop policies and actions to accelerate decarbonisation.

The Business and Industrial Processes Section highlights the need to work within the UK/EU-Emissions Trading Schemes, and as such some of the measures it might take are reserved. Further, we are pleased to see reference to the expectation that initiatives to prevent the leakage of emission through offshoring through measures such as the Carbon Border Adjustment Mechanism to incentivise decarbonisation of domestic goods such as steel and concrete. This matters for Scottish Water because, without strong anti-leakage measures, low-carbon materials risk becoming uncompetitive as cheaper, high-carbon imports could undercut the market. That would expose us to higher long-term costs and hinder our ability to deliver the embodied-carbon reductions needed to achieve our ambition of Going Beyond Net Zero by 2040.

Scottish Water has included carbon embodied in its investment programme within its net zero emissions pathway. This has led to extensive work with supply chains in the UK to develop and adopt low carbon assessment methods, standards, materials and approaches. This has supported innovation in new materials and techniques, building skills and expertise in the sector. It has also seen Scottish Water adopt more low carbon materials and products in our procurement frameworks.

A greater national focus is important to the development of further domestic low carbon industries and manufacturing, supporting the Just Transition.

Communication and engagement

The publication of short infographic style summaries of the sectoral approaches and plans, impacts, costs and benefits is very helpful. Communicating the need to decarbonise can be difficult, with concerns over costs and benefits. It is critical we communicate well and gain support for the continued delivery of climate change goals.

Scottish Water has sought to set out for customers how the actions it is taking to decarbonise provide wider benefits, particularly with respect to climate change. Measures to support more energy efficiency and renewable electricity generation offer wider benefits in terms of reduced longer term operating costs and increased energy security. Measures to restore peatland, create woodland and improve the state of our landholdings are critical to the long term resilience of our water catchments to climate change.

The infographics setting out the potential benefits of the Climate Change Plan are a useful tool to explain how they will support social, environmental and economic wellbeing, and to summarise the key policy drivers that will support the outcomes and actions. We suggest further development of these will be valuable in supporting communication on progress with key sectors and the wider public.

Indicators

We welcome the publication of a suite of indicators across the sectoral areas, and that they are intended to act as “early warning” lead indicators to allow for early action if there is a risk that the pathway will not be met. In terms of the specific indicators we would make the following observations:

- Buildings

In addition to the focus on energy and emissions we suggest indicators associated with the consumption of water also be included. Water is a precious resource under threat from climate change. It is heavy, requires energy, chemicals and a carbon intense asset base to supply to customers. Additionally, inefficient white goods in the home will use (and heat) a lot of water. Inclusion of water demand would align with wider goals on climate change and with the broader sustainability agenda.

In terms of embodied emissions further consideration should be given to developing a metric to assess the embodied carbon intensity of construction in Scotland to understand how Scottish construction sector is progressing the adoption of low carbon materials and the Circular Economy.

- Industry

Whilst we recognise this may not be sufficiently mature as an indicator, and that the primary focus remains Scottish territorial emissions, we suggest further work is undertaken to assess the embodied/consumption emissions of the Scottish economy and how they may be reported. With a growing focus on the need to decarbonise supply chains and adopt low carbon materials, we need to understand how this is progressing and where further support is required.

- Land-Use, Land- Use Change and Forestry

We support the measures suggested (hectares of woodland created, peatland restored etc) which align with some of Scottish Water’s goals. However, as we need to extend the consideration of carbon capture in nature to all habitats, we suggest a further opportunity to align with the Scottish Biodiversity Strategy Nature 30 objectives for percentage of land under management for nature.

- Agriculture

In addition to the suggested metrics which include area of woodland on agricultural land, we suggest expanding beyond simply woodland to consider other habitat types along with the proportion of Scottish farms adopting regenerative practices that protect and make space for water, improve nature and reduce carbon.