

# **Transform Scotland**

## **Draft Scottish Energy Strategy**

Form response - no need for introduction

**1. What are your views on the priorities presented in Chapter 3 for energy supply over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.**

**\*\*\* Please note that all questions will be answered solely in relation to transport\*\*\***

We are pleased to see that the Energy Strategy has focused on the need to decarbonise transport. Reducing carbon emissions from the transport sector, which has made minimal reductions over the past two decades, is vital to meeting Scotland's climate change targets.

Developing alternative fuel sources for transport is welcome in that this offers a low carbon alternative in comparison to petrol and diesel. Whilst this will help to reduce transport emissions, it is important to recognise that (as stated in the Strategy) the extent to which fuel sources such as hydrogen and biofuels can meet the future demand for transport is relatively low. Whilst biofuels can offer a low carbon alternative to petrol and diesel, it is vital that the source of biofuels is considered in great detail to ensure that indirect land use change (ILUC) is accounted for in emissions arising from the use of biofuels. Certain sources of biofuels, such as palm oil, can have very high carbon emissions when considering ILUC, due to the deforestation that often occurs in the production of the fuel.<sup>1</sup> As acknowledged in the Energy Strategy, biofuels cannot meet the demand for fuel used in transport, and so should not be considered as a viable replacement for petrol and diesel.

Attention should instead be focused on reducing the overall demand for transport; decarbonising vehicles by electrification; and improving fuel efficiency.

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<sup>1</sup> Transport & Environment (2017). Biofuels. <https://www.transportenvironment.org/what-we-do/biofuels>

**2. What are your views on the actions for Scottish Government set out in Chapter 3 regarding energy supply? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.**

See Q1.

**3. What are your views on the proposed target to supply the equivalent of 50% of all Scotland's energy consumption from renewable sources by 2030? In answering, please consider the ambition and feasibility of such a target.**

We support the Scottish Government's target for an equivalent of 50% of energy consumption to be met by renewables by 2030. Given the lack of progress so far in decarbonising heat and transport, this is a reasonable target.

We do however have concerns that the actions as set out in the draft Energy Strategy for transport create a high degree of uncertainty as to whether this target will be met. Many of the policies are highly dependent on either technology change (e.g. uptake of electric vehicles) or decisions made at a UK or EU level, both of which are outwith the control of the Scottish Government. This creates a large risk that transport will not decarbonise at a fast enough rate and will lag behind heat and electricity in decarbonisation.

It is also worth noting the importance of demand reduction measures in making the achievement of the 50% target possible. Replacement of petrol/diesel vehicles with electric vehicles will not require more energy overall but will require greater production of renewable generated electricity. By reducing the need to travel, Scotland's overall energy consumption and the increased demand for electricity can be reduced, helping in the achievement of the target and reducing the overall cost.

**4. What are your views on the development of an appropriate target to encourage the full range of low and zero carbon energy technologies?**

No views.

**5. What ideas do you have about how the onshore wind industry can achieve the commercial development of onshore wind in Scotland without subsidy?**

No views.

**6. What are your views on the potential future for Scotland's decommissioned thermal generation sites?**

No views.

## **7. What ideas do you have about how we can develop the role of hydrogen in Scotland's energy mix?**

Hydrogen has the potential to provide a low carbon source of fuel for transport in the future and should be supported in the coming years. However, as mentioned, hydrogen is unlikely to be able meet the demands of the transport sector in the near future. As such, hydrogen should be considered as a supplementary measure to reduce transport emissions, with focus given primarily to reducing the need for private vehicle use and electrifying vehicles.

## **8. What are your views on the priorities presented in Chapter 4 for transforming energy use over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.**

Greater focus needs to be put on reducing the demand for energy use in transport. The Energy Strategy acknowledges the need to encourage people to use public transport and active travel as an alternative to private vehicle use; whilst this message is positive, there is a need to back this up with strong policies to ensure that a significant modal shift to sustainable transport is achieved.

The focus on decarbonising road vehicles through electrification is welcome. However, the Government's target of 40% of new vehicles sales to be ULEV by 2032 falls far short of the Committee on Climate Change's (CCC) target of 60% by 2032, and far short of targets set by other European countries. As stated in Q3, reaching this level of electrification is also highly dependent on factors outwith the control of the Scottish Government, which creates a risk that this target may not be met. To meet the vision of a largely decarbonised transport system by 2050, it is likely that the CCC's target will have to be adopted, backed up by policies and actions which allow the Government to reach this target.

We have previously stated that in the short term, improved fuel efficiency will also be required alongside electrification to decarbonise transport. This is a good approach to take in the short term, but priority should be given to achieving a widespread modal shift to sustainable transport before focusing on decarbonisation.

## **9. What are your views on the actions for Scottish Government set out in Chapter**

**4 regarding transforming energy use? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.**

We are concerned that the actions listed in the Energy Strategy will not encourage a modal shift to active travel and public transport on a scale necessary to make notable reductions in energy demand. Actions in both the Energy Strategy and the Climate Change Plan need to reflect the need to achieve a modal shift. Doing so offers an opportunity to reduce emissions from transport whilst helping to achieve many of the Scottish Government's other ambitions (e.g. on health, congestion, air pollution).

We welcome the aim to improve vehicle emissions standards. However, given that the UK is set to leave the EU, neither the Scottish or the UK Government will have the same level of negotiating power to encourage greater fuel efficiency. This creates a high degree of uncertainty and risk around the promised improvements to emission standards.

The actions set out in relation to increasing the uptake of ULEVs are largely underpinned by the premise that consumers will adopt low carbon vehicles in the coming years. This means that meeting the carbon reduction targets is somewhat at risk, and leaves the Scottish Government with limited ability to decarbonise vehicles. Stronger policies need to be put in place to ensure that ULEVs are widely adopted in Scotland in the coming years.

**10. What ideas do you have about what energy efficiency target we should set for Scotland, and how it should be measured? In answering, please consider the EU ambition to implement an energy efficiency target of 30% by 2030 across the EU.**

No views.

**11. What are your views on the priorities presented in Chapter 5 for developing smart, local energy systems over the coming decades? In answering, please consider whether the priorities are the right ones for delivering our vision.**

No views.

**12. What are your views on the actions for Scottish Government set out in Chapter 5 regarding smart, local energy systems? In answering, please consider whether the actions are both necessary and sufficient for delivering our vision.**

No views.

**13. What are your views on the idea of a Government-owned energy company to**

**support the development of local energy? In answering, please consider how a Government-owned company could address specific market failure or add value.**

No views.

**14. What are your views on the idea of a Scottish Renewable Energy Bond to allow savers to invest in and support Scotland's renewable energy sector? In answering, please consider the possible roles of both the public and private sectors in such an arrangement.**

No views.

**15. What ideas do you have about how Scottish Government, the private sector and the public sector can maximise the benefits of working in partnership to deliver the 2050 vision for energy in Scotland?**

No views.

**16. What ideas do you have about how delivery of the Energy Strategy should be monitored?**

No views.

**17. What are your views on the proposed approach to deepening public engagement set out in Chapter 6?**

We welcome the opportunity to engage on consultations such as the Energy Strategy. These provide a good opportunity for organisations such as ours to engage with the Scottish Government and collaborate to create a more sustainable future. However, it is of vital importance that these consultation opportunities are constructive and that advice is fully considered, and that consultations do not simply become a 'box ticking' exercise.