

Response to the Scottish Government consultation on the draft Climate Change plan

Section 1: Delivering a Just Transition

The following questions concern the Delivering a Just Transition section of the Plan, more specifically: communities, skills, workforce, employers and adapting to climate change.

1. What are your views on our approach to delivering a just transition for people and communities?

As members of Stop Climate Chaos Scotland, the Scottish Women's Budget Group supports the detailed and informed response the coalition has provided here: www.stopclimatechaos.scot/wp-content/uploads/2026/01/SCCS-response-to-Scottish-Government-consultation-on-draft-Climate-Change-Plan-Jan-2026.pdf

In addition, this response to the consultation focuses specifically on our perspective as an organisation committed to women's equality and the need for Scotland's response to climate change to build equality into the transition from the outset.

We welcome the plan's intention to "avoid repeating the mistakes of previous economic transitions", and the work currently underway to "ensure a just transition for people and communities, workers and employers". However, while work on certain regions in Scotland is understandable due to the likely deeper structural and economic impacts resulting from transitioning to net zero, for example in the Northeast, the plan is silent on the role that social infrastructure must play in delivering a just transition for communities. In this regard, the plan continues to adopt the traditional, male-centric outlook of the economy and economic opportunities, focusing primarily on the transition from oil and gas industries while ignoring other key contributors to economic development. Women who have engaged with SWBG based in these areas have also highlighted the need for there to be greater emphasis on community support rather than just worker transition. Supporting workers in oil and gas to reskill to work in renewables is positive, but this approach falls short from delivering transformative change for communities in Scotland as part of the just transition.

The lack of gender analysis in the plan is acutely salient, both in terms of recognising and including actions to increase women's representation in the sectors listed—namely building, transport, water, energy supply, business and industrial processes, agriculture, and LULUCF—and in widening our understanding of the economy. As such, the plan fails to recognise the role that the care sector can play in contributing to Net Zero while delivering a Just Transition for Communities. The UK Women's Budget Group has produced detailed work about this topic, including job creation

figures and carbon emission savings link to investing in social infrastructure:
<https://www.wbg.org.uk/publication/creating-a-caring-economy-a-call-to-action-2/>

Finally, through our engagement work with women in Aberdeen, participants pointed out that, while the ambition to produce more energy from renewable sources is crucial, they would like to see this production translate into decreasing levels of fuel poverty in Scotland. These women were clear that a Just Transition must support greater use of community energy schemes, rather than opening the market to foreign companies whose profit-seeking motives can jeopardise a Just Transition. Unfortunately, the 2026-27 budget appears to suggest a reduction in budget to support community energy and lacks detail on the potential impact of this reduction on those with protected characteristics.

2. We recognise that workers face particular impacts from the Plan and we have outlined our approach to supporting the transition of the workforce, including skills for jobs. What skills, training and qualification provisions will be most important in a net zero future and what more could be done to support them?

The answer to this question has two parts. On the one hand, specific work must be carried out to improve women's participation in the sectors listed in the plan, which are overwhelmingly male-dominated. This must include improvements in working conditions, such as—but not limited to—flexible working arrangements and care-related policies, including enhanced maternity and paternity leave. On the other hand, the Just Transition must serve as a catalyst to end the undervaluation of traditionally female-dominated sectors, such as care, health, and education, and to recognise the value of these sectors for the multiplier effects they generate across society as a whole, and the important role they will play in a low-carbon economy.

3. The Plan will bring opportunities and challenges for businesses and employers. How can we best support employers across the private, public and third sectors to make the changes needed and seize the benefits of net zero?

4. Our approach recognises that some of the Plan's impacts will have greater implications for particular regions of Scotland. What are your views on our approach to supporting places where the transition presents particular regional impacts?

Section 2: Sectoral contributions and policies and proposals

Section 3: Impact Assessments

The following questions concern the Business and Regulatory Impact Assessment (BRIA), Child rights and wellbeing impact assessment (CRWIA), Island Communities Impact Assessment (ICIA), Equality Impact Assessment (EQIA), Fairer Scotland Duty Assessment (FSD). The purpose of these impact assessments is to understand the effects of government policy on specific groups, including children and young people, island communities, business and equalities groups.

16. Which groups or communities do you think will be most affected by the transition to net zero, and in what ways?

With significant budget resources being necessary to tackle the climate emergency, these must work to tackle inequalities to deliver a Just Transition. Otherwise, they risk entrenching the existing inequalities that are prevalent in our society. The EQIA produced alongside the Climate Change Plan sets out a range of evidence on how those with protected characteristics face specific inequalities across a range of thematic areas. However, what is missing in the evidence provided is an understanding of intersectional impacts, for example age and gender or disability and gender. There are a couple of examples where intersections of evidence are brought together, particularly in relation to health. However, more often the intersections are missed, and this weakens the overall assessment.

Following the outline of the evidence within the plan EQIA, there is little detail on how this evidence has specifically driven decision-making and how the actions in the plan will address the identified inequalities, or how they can be mitigated.

In several areas future EQIAs will be needed as detailed sectoral and programme plans are developed. It is critical that these assessments are used to inform the development process to ensure that inequalities are tackled as part of the response to climate change.

17. How do you think the Climate Change Plan aligns with existing local, regional, or national priorities that you are aware of or involved in?

18. If you identified there could be negative impacts of the Climate Change Plan, are there any ways you think we could reduce that negative impact and if so, what would you recommend?

The absence of gender analysis in the plan is a key concern as it risks failing to deliver a Just Transition for communities in Scotland. Beyond the lack of recognition of the care sector and the important role it should play as part of a Just Transition, this absence could result in the design of policies that are not gender responsive. While the sectoral contributions section includes a discussion of economic opportunities and co-benefits, a brief review reveals no information on whether changes to, for instance, transport will reduce or exacerbate gender inequalities—for example, by improving connectivity or the design of public transport routes and links.

SWBG provided input including experience from working with women's groups within the Just Transition Transport Plan, but concrete action to address this remains absent. The government has recognised that investment in ending peak fares has positively contributed to reducing emissions, but the primary benefits may be more accessible to middle- or higher-income households and consumers.¹ In order to achieve Transport Scotland's goal of reducing inequalities in public transport use, it is necessary to see further analysis of how additional investment in buses, alongside

¹ Transport Scotland (2024) [Scotrail Peak fares pilot removal project – final evaluation report](#)

the removal of peak train fares, can work together to have a cumulative positive impact for those who experience the greatest inequalities in accessing public transport, including women, disabled people, people from ethnic minority communities and those on low incomes. Without this, it is likely that current investment will maintain or widen inequalities in access to affordable public transport.

From this perspective, it is crucial that gender analysis and gender budgeting inform the plan from the outset, allowing this approach to be embedded into future action plans and policy development.

19. Please share any other quantitative data, or sources of this, to assist in developing the impact assessments?

20. Are there any previous examples or case studies we should consider when assessing potential impacts?

A useful example to consider relates to Active Travel Infrastructure. The Scottish Government committed to spending 10% of the transport budget on active travel. However, our work with Sustrans showed that increased investment in infrastructure alone will not lead to the diversity needed to achieve the Government's vision.

One of the strategic objectives of the Active Travel Framework was "Reduced Inequalities". Despite this, the outcomes and indicators focused primarily on improving the availability and safety of infrastructure for "all" and on increasing the number of kilometres built.

Our Women's Survey 2023 included questions on transport. It found that 59% of respondents felt questions on the access and safety of cycle routes were not applicable to them, and 34% felt the same about walking and wheeling routes. Those who did respond reported that they did not walk, wheel, or cycle for journeys because routes did not take them to where they needed to go, or because they did not feel safe using the available routes.

This shows that, while funding exists to build cycling routes, it is essential that it is used in ways that promote equality. Including women in the design of this type of infrastructure is therefore crucial, as it is to include gender analysis to the Climate Plan to ensure that the Just Transition delivers for all communities in Scotland, including women.

Work conducted for Sustrans (now the Walk Wheel Cycle Trust) provided a clear framework of how gender budgeting would support investment in active travel to work towards the target of reduced inequalities. More on this work, including a full report with case studies and the evaluation framework, can be found here: www.walkwheelcycletrust.org.uk/our-blog/opinion-and-advocacy/the-case-for-gender-budgeting-in-active-travel/

Alongside considering the specific spend on active travel, it will be critical that budgets at a national and local level deliver coherent policy. While investment is being made in active travel, analysis of local budgets shows a reduction in spending

on street maintenance and lighting, which is counterproductive to increasing active travel options.

This example can be used to consider other transport investment from a gendered perspective.

21. Can you think of any further positive or negative impacts, that are not covered in the impact assessments, that may result from the Climate Change Plan?

Section 4 Strategic Environmental Assessment

Section 5 Monitoring emissions reductions

Section 6 Monitoring Just Transition

The following questions concern the 14 proposed indicators for monitoring and evaluation of the Climate Change Plan

29. Please detail any specific changes that would improve any of the 14 proposed indicators, including any data sources not currently included within this framework that could provide a useful indicator of progress towards a just transition in Scotland on an annual basis.

The plan recognises that there is a need to combine ‘single whole-of-Scotland measures with those that focus on specific sub-groups of the population’. This approach is, in itself, a positive one; however, the examples provided suggest that the approach taken to these subsets focuses primarily on geography. In addition to understanding the geographic impact, it is essential that these measures are disaggregated by sex and other relevant characteristics, and that, where possible, an intersectional gender analysis is undertaken.

30. What are the most appropriate indicators for judging whether we are achieving meaningful public participation in decisions related to the climate? This includes both the quality of the participatory process itself, and the impact of that participation on the decision-making process.

As the draft plan highlights, using quantitative approaches alone to measure participation meaningfully will be difficult. To understand whether participants feel that their involvement has been meaningful, qualitative approaches will also be necessary. Some indicators that could provide insight include:

- Numbers involved;
- Characteristics of those involved;
- Number of changes and/or recommendations made by communities that have been acted upon;
- Feedback from those participating in how they found engagement in the process.

31. What indicator would provide the best measure of the impact of net zero development in local communities across Scotland? For example, the impact of the installation of renewable energy infrastructure or other land use changes (e.g. through peatland restoration or tree planting).

Key measures for assessing whether a Just Transition has been achieved will be those that indicate the extent to which inequalities within our communities have been addressed.

From engagement with women, measuring the impact on fuel poverty and food security was identified as an important way to understand how the work is affecting broader communities.

The approach should incorporate both quantitative and qualitative data to capture the full impact of changes, including aspects that quantitative measures alone may not reveal.

32. Ensuring positive outcomes for workers who have transitioned from jobs within high-carbon industries is central to delivering a just transition. What specific data or indicators could we use to monitor the extent to which workers in high-carbon industries are securing alternative employment?

33. What specific data or indicators could we use to meaningfully monitor the impact of the transition to net zero on the environment and biodiversity across Scotland on an annual basis?

About us

The Scottish Women's Budget Group (SWBG) is an independent analysis and campaign group that aims to promote gender analysis in public policy and public finance decisions through budgetary processes. SWBG brings together a wide range of women from across Scotland who have an interest in women's equality and want to achieve better gender equality in our society. We have focused on encouraging active gender analysis in the Scottish Budget process since 2000.