

Energy Saving Trust's response to the Scottish Government's Call for Evidence on Coal Extraction Policy

Response submitted 22nd July 2022

Considering the information presented in this call for evidence paper, and your own knowledge and experience, what are your views on the extraction of coal in Scotland.

Energy Saving Trust supports the Scottish Government's ambitious climate change targets and their view that "...unlimited extraction of fossil fuels is simply incompatible with protecting the planet". Any moves to extract coal in Scotland would be a backwards step, be inconsistent with meeting Scotland's climate change targets, would undermine the Scottish Government's credibility with the public, would harm Scotland's leadership on climate change and would conflict with expert scientific advice. We therefore think that the Scottish Government should have a policy position of no support for the extraction of coal in Scotland.

Scotland has admirably ambitious net zero targets. A policy position of no support for the extraction of coal in Scotland would help to ensure the Scottish Government's 2030 climate change targets don't become unnecessarily harder to meet. In their letter to the Cabinet Secretary for Environment, Climate Change and Land Reform in February 2020 which responded to a request from the Cabinet Secretary for advice relating to Scotland's 2030 emissions reduction target the CCC noted that "*Given that Scotland has all but exhausted the potential for reductions in fossil-fired electricity generation that drove progress in reducing emissions in the 2010s, the 2030 target will be extremely challenging to meet, even if Scottish Ministers take action to get on track for Net Zero by 2045. The rapid emissions reductions required for a 75% reduction by 2030 may not be feasible without extreme implications for cost and/or required changes in behaviour*".¹ As Scotland currently has no operational coal mines any coal extraction in Scotland would increase Scotland's emissions and make it harder to meet its legally binding climate change targets. Making it harder to meet targets that are already recognised as being "*extremely challenging to meet*" would not be a credible approach.

¹ See: <https://www.theccc.org.uk/publication/letter-lord-deben-climate-change-committee-to-roseanna-cunningham-msp/>

A policy position of no support for the extraction of coal in Scotland would help to ensure that the Scottish Government is seen to be consistent with its own environmental and net zero ambitions . Any plans for coal extraction in Scotland would be hard to justify when people are being asked to/are soon to be asked to make significant changes in order to reduce emissions and to improve air quality. It is therefore vitally important that what the Scottish Government does is consistent with what it says and what it asks the public to do. Of particular relevance here is the Scottish Government's commitment to ban the sale of house coal in Scotland. This forthcoming ban is one that Energy Saving Trust supports and is not hard to defend in the current context but would be harder to defend if coal extraction was permitted in Scotland.

A policy position of no support for exploration for the extraction of coal in Scotland would also ensure that the Scotland Government's approach was in line with expert advice. This includes that from the International Energy Agency whose recent UK Government commissioned report "*Net Zero by 2050: a Roadmap for the Global Energy Sector*" which is "*the world's first comprehensive study of how to transition to a net zero energy system by 2050 while ensuring stable and affordable energy supplies, providing universal energy access, and enabling robust economic growth*" and emphasises that beyond projects already committed as of 2021 "*...no new coal mines or mine extensions are required*". It also includes research recently published in Nature² which suggests that around 90 per cent of coal needs to remain unextracted in order to keep within a carbon budget consistent with 1.5°C warming.

If the Scottish Government is to meet its climate change targets, do all it can to address high energy prices and improve energy security it must not provide support for the extraction of coal in Scotland. Rather it must double down on its efforts to transition to clean energy sources and reduce energy consumption.

² [Unextractable fossil fuels in a 1.5 °C world | Nature](#)