



Scottish Care

Voice of the independent care sector

ENERGY STRATEGY AND JUST TRANSITION PLAN CONSULTATION

SCOTTISH CARE RESPONSE – MAY 2023

1. What are your views on the vision set out for 2030 and 2045? Are there any changes you think should be made?

For the points that we will highlight and explain it is important to set out the context in which they based in. The social care sector in Scotland is currently experiencing several challenges and is often missing from the NetZero debate or the creation of relevant and appropriate interventions to support businesses in transition. This is partly because social care has experienced prolonged under recognition and underfunding leading to, amongst other things, a workforce crisis. As reported in our 2021 Workforce Recruitment & Retention Report¹, 87.8% of providers cited recruitment and retention as problematic. The lack of fair contracts and underfunding that the social care sector has experienced to date has resulted in disproportionate salaries and terms and conditions for frontline social care workers. This is exacerbated by society's misunderstanding of the true value and cost of care. There needs to be understanding that care providers are funded in the main by government so that funding needs to allow for investment in both capital and staffing, but that they also play a role in supporting individuals accessing care and support to transition.

2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?
3. How can we ensure our approach to supporting community energy is inclusive and that the benefits flow to communities across Scotland?

We outlined in our co-produced 2021 report 'Climate Action and the Social Care Collective' that there needs to be greater understanding of climate change. This understanding should provide, implications of the climate change in communities and various sectors, especially skills on being climate resilient. These strategies although important cannot be presented as the end solution to our climate problems as it might discourage communities to engage in the long run. Learning to live with unavoidable impact and anticipate them will empower people to implement change.

4. What barriers, if any, do you/your organisation experience in accessing finance to deliver net zero compatible investments?
5. What barriers, if any, can you foresee that would prevent you/your business/organisation from making the changes set out in this Strategy?

¹ [WF Interim Report \(scottishcare.org\)](https://www.scottishcare.org/)

As explained in our answer to question one, there is a current crisis in social care one that is exacerbated by its continued underfunding. Therefore, appropriate funding models will need to be highlighted and investigated to ensure that they can assist both staff, care service providers and service users to achieve the goals set out in this plan.

Additionally, regarding the social care workforce, care staff must have physical and economic access to appropriate training to be able to meet the demands that these plans will create. This training must ensure that the responsibilities placed upon them, and the skillset needed to fulfil this role are well defined resourced and understood. Furthermore, as outlined in our co-produced report 'Climate Action and the Social Care Collective', providing the necessary support will allow care staff to engage in conversation and actions around this strategy. Due to the current workforce shortages in the sector care staff are often performing at maximum capacity and without the support effective implementation of this strategy cannot be achieved.

6. Where do you see the greatest market and supply chain opportunities from the energy transition, both domestically and on an international scale, and how can the Scottish Government best support these?
7. What more can be done to support the development of sustainable, high quality and local job opportunities across the breadth of Scotland as part of the energy transition?
8. What further advice or support is required to help individuals of all ages and, in particular, individuals who are currently under-represented in the industry enter into or progress in green energy jobs?
9. Should the Scottish Government set an increased ambition for offshore wind deployment in Scotland by 2030? If so, what level should the ambition be set at? Please explain your views.
10. Should the Scottish Government set an ambition for offshore wind deployment in Scotland by 2045? If so, what level should the ambition be set at?
11. Should the Scottish Government set an ambition for marine energy and, if so, what would be an appropriate ambition?
12. What should be the priority actions for the Scottish Government and its agencies to build on the achievements to date of Scotland's wave and tidal energy sector?
13. Do you agree the Scottish Government should set an ambition for solar deployment in Scotland? If so, what form should the ambition take, and what level should it be set at?
14. In line with the growth ambitions set out in this Strategy, how can all the renewable energy sectors above maximise the economic and social benefits flowing to local communities?
15. Our ambition for at least 5GW of hydrogen production by 2030 and 25GW by 2045 in Scotland demonstrates the potential for this market. Given the rapid evolution of this sector, what steps should be taken to maximise delivery of this ambition?
16. What further government action is needed to drive the pace of renewable hydrogen development in Scotland?
17. Do you think there are any actions required from Scottish Government to support or steer the appropriate development of bioenergy?
18. What are the key areas for consideration that the Scottish Government should take into account in the development of a Bioenergy Action Plan?
19. How can we identify and sustainably secure the materials required to build the necessary infrastructure to deliver the energy strategy?
20. Should a rigorous Climate Compatibility Checkpoint (CCC) test be used as part of the process to determine whether or not to allow new oil and gas production?

21. If you do think a CCC test should be applied to new production, should that test be applied both to exploration and to fields already consented but not yet in production, as proposed in the strategy?
22. If you do not think a CCC test should be applied to new production, is this because your view is that:
 - a. Further production should be allowed without any restrictions from a CCC test
 - b. No further production should be allowed
 - c. Other reasons
23. If there is to be a rigorous CCC test, what criteria would you use within such a test?

In particular in the context of understanding the impact of oil and gas production in the Scottish North Sea specifically on the global goals of the Paris Agreement, should a CCC test reflect:

- i. A) the emissions impact from the production side of oil and gas activity only
 - ii. B) the emissions impact associated with both the production and consumption aspects of oil and gas activity i.e. also cover the global emissions associated with the use of oil and gas, even if the fossil fuel is produced in the Scottish North Sea but exported so that use occurs in another country – as proposed in the Strategy
 - iii. C) Some other position.
- b. Should a CCC test take account of energy security of the rest of the UK or European partners as well as Scotland? If so, what factors would you include in the assessment, for example should this include the cost of alternative energy supplies?
 - c. Should a CCC test assess the proposed project's innovation and decarbonisation plans to encourage a reduction in emissions from the extraction and production of oil and gas?
 - d. In carrying out a CCC test, should oil be assessed separately to gas?
24. As part of decisions on any new production, do you think that an assessment should be made on whether a project demonstrates clear economic and social benefit to Scotland? If so, how should economic and social benefit be determined?
 25. Should there be a presumption against new exploration for oil and gas?
 26. If you do think there should be a presumption against new exploration, are there any exceptional circumstances under which you consider that exploration could be permitted?
 27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?

When appropriate schemes are created to drive energy efficiency, support should be given directly to care providers on behalf of residents in their full-time care. For example, the current Energy support scheme which the government introduced late last year, is not available to care homes who pay the energy bills, but to care home residents who are not obliged to pass that funding on. As highlighted above the issues facing the sector places time constraints for staff who have the knowledge and training to be able to access this sort of support. Therefore, the extra step in this scheme would have been expensive for care homes especially if they were short, staffed which they often are. For schemes like this a direct route needs to be created, considering the struggles of the sector. Additionally, care staff who support service users in their homes should have access to and be resourced for appropriate training to assist those individuals they support. This will allow care staff to help boost efficiency as they will be in the best position to deliver any

needed knowledge or tips to service users. We hear from care staff that when they visit people in their own homes, they are often aware those individuals may be in fuel poverty. They would benefit from access to a referral scheme to a green energy champion, to allow care staff to highlight service users who need extra support with the transition. This will allow the government to more effectively identify how many and who exactly is suffering from heat poverty.

28. What changes to the energy system, if any, will be required to decarbonise transport?

As previously described, government funding for social care does not cover investment. Therefore, to decarbonise transport in the social care sector, social care providers need to be given access to grants which will enable them to transition to electric and hydrogen vehicles. Furthermore, care staff regularly utilise transport to carry out their duties, yet we have seen a reduction in public transport services particularly in rural areas and in later hours of the day at a time when many finish their shift. First a policy should be created to specifically target and promote public modes of transport. Additionally, the time constraints of some of their roles must be understood to be able to assess the efficiency of such policy. For care staff who must rely on private transport, to encourage them to transition to energy efficient vehicles charging and gas stations must be readily available along their work routes. Therefore, the accessibility of these stations near care homes and in neighbourhoods with an older demographic, should be prioritised. Greater impetus on shared route planning as we have seen with the 'Fife Care at Home Collaborative' would further reduce travel.

29. If further investment in the energy system is required to make the changes needed to support decarbonising the transport system in Scotland, how should this be paid for?

30. What can the Scottish Government do to increase the sustainable domestic production and use of low carbon fuels across all modes of transport?

31. What changes, if any, do you think should be made to the current regulations and processes to help make it easier for organisations to install charging infrastructure and hydrogen/low carbon fuel refuelling infrastructure?

32. What action can the Scottish Government take to ensure that the transition to a net zero transport system supports those least able to pay?

33. What role, if any, is there for communities and community energy in contributing to the delivery of the transport transition to net zero and what action can the Scottish Government take to support this activity?

34. What, if anything, could be done to increase the reuse of electric vehicle batteries in the energy system?

Electric vehicle batteries typically still have around 80% of their capacity when they need replacing and can be used for other applications, for example as a clean alternative to diesel generators.

35. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the agricultural sector to decarbonise energy use?

36. What are the key actions you would like to see the Scottish Government take in the next 5 years to support the development of carbon capture, utilisation and storage (CCUS) in Scotland?

37. How can the Scottish Government and industry best work together to remove emissions from industry in Scotland?

38. What are the opportunities and challenges to CCUS deployment in Scotland?

39. Given Scotland's key CCUS resources, Scotland has the potential to work towards being at the centre of a European hub for the importation and storage of CO₂ from Europe. What are your views on this?
40. What additional action could the Scottish Government or UK Government take to support security of supply in a net zero energy system?
41. What other actions should the Scottish Government (or others) undertake to ensure our energy system is resilient to the impacts of climate change?
42. Are there any changes you would make to the approach set out in this route map?
43. What, if any, additional action could be taken to deliver the vision and ensure Scotland captures maximum social, economic and environmental benefits from the transition?

In addition to the points outlined above, it is important to carry out an impact assessment of the social care sector, for those who deliver and receive care. In our report 'Climate Action and the Social Care Collective', we outlined that effects on the older population or recipients of care can have ripple effects thus increasing the demand and reliance on social care. For example, if people are unable to heat their homes due to increased energy costs, this could have a negative impact on their health thus increasing their reliance on care staff. These necessary assessments will help the government to understand how the demand on the social care sector could increase thus disabling care staff to effectively engage in the implementation of the just transitions plans.

44. Could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic?
45. Could any of the proposals set out in this strategy have an adverse impact on children's rights and wellbeing?
46. Is there any further action that we, or other organisations (please specify), can take to protect those on lower incomes or at risk of fuel poverty from any negative cost impact as a result of the net zero transition?
47. Is there further action we can take to ensure the strategy best supports the development of more opportunities for young people?
48. What are your views on the approach we have set out to monitor and evaluate the Energy Strategy and Just Transition Plan?
49. What are your views on the draft Just Transition outcomes for the Energy Strategy and Just Transition Plan?
50. Do you have any views on appropriate indicators and relevant data sources to measure progress towards, and success of, these outcomes?
51. Do you have any comments on the environmental baseline information referred to in the Environmental Report?
52. Are you aware of further information that could be used to inform the assessment findings?
53. What are your views on the assessment findings?
54. Are there other environmental effects arising from the draft Energy Strategy and Just Transition Plan?
55. Do you agree with the justification for the approach to the alternatives?
56. What are the most significant environmental effects which should be taken into account as the draft Energy Strategy and Just Transition Plan is finalised?
57. How can the draft Energy Strategy and Just Transition Plan be enhanced to maximise positive environmental effects?
58. What do you think of the proposed approach to mitigation and monitoring?

59. What is your name?

Ifeoluwa Asefon

60. What is your email address?

ifeoluwa.asefon@scottishcare.org

61. Are you responding as an individual or an organisation?

a. Individual

b. Organisation

62. What is your organisation?

We are a representative body. A charity representing over 400 small and medium sized organisations, which totals almost 800 individual services, delivering residential care, nursing care, day care, care at home and housing support services. Our membership covers private, not for profit and charitable provider organisations.

63. If responding on behalf of an organisation, please enter the organisation's name here.

Scottish Care

64. The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

a. Publish response with name

b. Publish response only (without name)

c. Do not publish response