

Response to Climate change plan 2026-40 consultation

January 2026

Summary of response to the draft Climate Change Plan

Citizens Advice Scotland (CAS) supports the Climate Change Plan's intention to reduce emissions and recognises the need for wide-ranging changes to achieve this. Our evidence indicates there is a real risk people in vulnerable circumstances will be negatively impacted if certain steps are not taken. Nobody should be left behind as part of a truly just transition.

Therefore, we recommend that the Scottish Government:

- Ensures that the Plan prioritises the elimination of fuel poverty and that this is a central part of the Plan's purpose.
- Targets energy efficiency and low carbon heating schemes to those who need it most and are least able to pay.
- Contributes to the public's trust in energy efficiency and low carbon heat measures by reviewing current schemes, strengthening accreditation of installers and improving monitoring of standards.
- Ensures secure, sustainable funding for free, impartial advice services accessible to people across Scotland to support people through the transition to net zero.
- Re-introduces the Heat in Buildings Bill as a matter of priority at the beginning of the new parliamentary term.
- Expands initiatives such as the Low Carbon Infrastructure Transition Programme, in order to create opportunities for heat network projects across Scotland.

Eliminating fuel poverty as a priority

The climate change plan must take every opportunity to prioritise the elimination of fuel poverty. People are struggling to pay for their energy; our most recent data shows that between July and September 2025, 7,500 people needed energy advice from their local CAB. 70% of this advice was sought by people living with a long-term health condition or disability. The financial impact of fuel poverty is also seen through the average energy debt brought to the CAB network which remains very high at over £2,500. This is even higher for people living in rural areas (approximately £3,100) and who have additional energy needs for medical equipment or certain health conditions. At the sharpest end, over a third of people needing energy advice in Q2 also needed a referral for a fuel voucher, despite this period being in the summer months.

At Citizens Advice bureaux across the country, we see that few problems exist in isolation. People may come to us for help on debt, and also need to receive support with fuel poverty, damp and mould or energy efficiency. We see and understand the full picture and recognise that elimination of fuel poverty is essential in a just and compassionate Scotland, and must be central to the just transition.

Callum's experience: Callum* contacted his local CAB after waking up with no gas or electricity supply. With two young children and a newborn baby, the home needs to be kept warm, which is difficult because of high energy costs and draughty windows. Still awaiting the outcome of his Adult Disability Payment application, Callum's sole income is Universal Credit. His next payment was 6 days away, and he did not have enough money to buy nappies and baby formula or top up his meters. Callum was worried about his children's wellbeing and needed an urgent referral for support. (*Name changed for privacy)

The energy market is broken and there is urgent need for a long-term solution to address affordability. CAS supports a social tariff - a discount on energy bills for people living on low incomes and those with unavoidably high energy consumption. This must be delivered alongside a robust, comprehensive, and accessible debt relief scheme that is focused on write-offs.

Energy efficiency and access to clean heat technology

Scotland cannot deliver on the ambitions of the CCP without bold and decisive action to improve energy efficiency and the widespread take-up of low carbon heating in our homes. The Scottish Government should take measures to improve the quality and energy efficiency of Scotland's housing stock, including increasing funding, to deliver not just on targets for decarbonisation, but on bringing down bills and tackling fuel poverty.

Delays to the Heat in Buildings Bill will hamper progress towards achieving the aims of the CCP. We recognise that there will be a number of pieces of legislation introduced as part of the CCP and that there are plans to bring forward the Heat in Buildings Bill early in the next parliamentary term. It is imperative that these frameworks for facilitating Scotland's transition to net zero are focused on tackling fuel poverty, with funding schemes to deliver energy efficiency measures and low-carbon heating technology that are genuinely accessible and targeted towards those who are most in need and least able to pay.

Improvements for tenants, regional considerations and restoring public trust

The introduction of a minimum standard of EPC C for the private rented sector is essential, but we urge that this must be uniform across tenures. Without legislation that ensures good energy efficiency across all tenures, people will continue to live in cold, damp, and mouldy homes, impacting their physical and mental health, in turn putting additional pressures on the NHS and other public services. This is demonstrated in our recent [Left in the cold](#) research report based on qualitative case evidence from across the network of Scottish Citizens Advice Bureaux, providing unparalleled insight into the lived experience of the harms caused by unsafe housing. The CCP must therefore be aligned with and support incoming regulations on minimum standards for energy efficiency, damp, and mould.

Unfortunately, efforts to date to upgrade energy efficiency and install low carbon heat have been patchy at best and damaging at worst. Nearly 800 people approached us for advice on energy efficiency in Q2 alone, across all tenures. In the private rented sector, we see inaction from landlords on disrepair or damp and mould; in 2025, 30% of the people living in the private rented sector (PRS) that our network supported were

experiencing these issues. This means that many PRS tenants are living in damp, draughty properties, with little control over how to improve the energy efficiency of their homes. There must be greater clarity for landlords about energy efficiency expectations, reasonable support to fulfil these requirements, and robust enforcement of consequences where they have not been met.

We also have extensive evidence of people, and especially social tenants, requiring advice about poor quality energy efficiency installations or low carbon heating systems which have increased their bills and not improved thermal comfort. This is especially pronounced in rural and island communities for a number of reasons: bureaux advisers in Shetland have told us that retrofitting building work is patchy and installers are hard to come by, with several closing down. They have also told us that people have had heat pumps installed that have become rusty and stopped working properly after only a few years due to the wind and salty air. They have further reported incidences of people having to use electric heaters as well as their heat pump, as the pump alone doesn't warm their homes enough. **We also know that substandard installations and botched schemes such as the Green Deal and ECO have seriously damaged people's trust and confidence to take forward energy efficiency improvements.**

Duncan's experience: As an example, Duncan* recently contacted his local CAB for advice as he had solar panels and an air source heat pump fitted under the ECO4 funding. He qualified under the disability eligibility. He is now struggling to pay his energy bills, which are costing him £30 a day and he says the house is still freezing. The only real heat is from the coal fire in the living room. He is very angry about this and wants to seek redress. (*Name changed for privacy)

The Scottish Government must undertake to rebuild the public's trust in energy efficiency and low carbon heating measures by reviewing current schemes, strengthening accreditation of installers and improving monitoring of standards. There must also be a focus on scaling up retrofitting work in rural and remote communities. It is imperative that low carbon technology is suitable for local climate conditions. As regards the development of new low carbon heating technology in particular, the provision of advice services must be resourced to support this transition, otherwise this will restrict progress. People across Scotland must be able to access free, impartial advice about their options. This all must be underpinned by a significant and substantive public awareness and information campaign.

The importance of heat networks is understated in the CCP consultation paper; the development of these is a vital step in the transition to net zero. The Scottish Government should expand initiatives such as the Low Carbon Infrastructure Transition Programme, to create opportunities for similar heat network projects to be established across Scotland.

Conclusion

In summary, in order to deliver on the ambitions of the CCP, the Scottish Government must focus on developing a strong suite of legislation and regulations to ensure people, especially those in or at risk of fuel poverty, can access energy efficiency measures and low-carbon heating systems in which they can trust. The role of advice services is essential in supporting people through the just transition and they must be resourced with secure,

sustainable funding. This is foundational to ensuring that the transition to net zero is truly a just one.

About Citizens Advice Scotland

The Citizens Advice network in Scotland is Scotland's largest independent advice provider. Advisers across all corners of the country work in Citizens Advice Bureaux (CAB) to provide free, impartial, and confidential advice. Our Extra Help Unit (EHU), based in Glasgow, helps people resolve complex and time-sensitive energy problems. Each year our network supports hundreds of thousands of people, unlocking millions of pounds worth of financial gains. By looking at a person's complete circumstances, CAS gains an unparalleled insight into the scale and complexity of what's happening in communities throughout Scotland.