

### Just Transition Energy Strategy Consultation May 2023

#### Introduction

The Scottish Women's Budget Group believes an equal and more caring, green economy is possible. 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. The organisation has focused on encouraging active gender analysis in the Scottish Budget process since 2000.

Climate change does not affect everyone equally. Throughout the world, women and girls are more vulnerable to its impacts, which amplify and interact with existing gender inequalities. This remains true in Scotland where women face greater barriers to financial security and are therefore more at risk to the shocks associated with climate change and that could be mitigated through a feminist just transition.

A feminist just transition addresses the broader socio-economic dimensions required to radically shift Scotland to net zero and tackle gender inequality. It is not something to be tacked on to existing policy but is a bold approach to transform the economy. Within this wider view of a just transition there is a need to recognise the role that care plays in both our society and economy. Care jobs are already low carbon in nature and predominately carried out by women, care jobs are green jobs.<sup>1</sup>

The unequal impact of the climate crisis and the scale of transformation to address this both have the danger of entrenching and widening existing inequalities in our society in Scotland, and globally. Throughout our response to the Just Transition Energy Strategy SWBG outlines ways to build gender analysis into the policy making and public spending processes to tackle entrenched inequalities. Ensuring an intersectional analysis as part of the policy making process linked to the economic transition is an essential step to realise the ambition of creating a fairer, more equal Scotland.

Not all questions were answered within this consultation, question numbers are therefore not in order

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

The overarching vision in the Just Transition Energy Strategy has laudable goals of a Scotland with a "flourishing, climate friendly energy system that delivers affordable, resilient and clean energy supplies". However, it misses an opportunity within the vision to highlight the importance of tackling inequality through every strand of Just Transition work conducted by the Scottish Government.

<sup>&</sup>lt;sup>1</sup> Women's Budget Group (2022) A Green and Caring Economy

The vision chapter makes an important commitment to the need for affordable energy, prioritising those in or at risk of fuel poverty. This offers an important opportunity to tackle inequality for women and marginalised groups if the strategy is delivered with specific analysis of how it will impact on people differently.

Women are more likely to be poor, have lower levels of savings and wealth and are less able to increase paid work than men due to caring responsibilities. Furthermore, evidence suggests that women from Bangladeshi, Pakistani and Black ethnic groups, disabled people, single parents, survivors of abuse, unpaid carers and women with no recourse to public funds experience higher poverty rates and are at the sharp end of the cost-of-living crisis.<sup>2</sup>

This means that measures to tackle fuel poverty and ensure affordable energy could have a positive impact for women on low-incomes. Equally, these measures could also bring positive outcomes for children living in low-income households. As children's poverty is intrinsically linked to women's poverty,<sup>3</sup> delivering a Just Transition within the energy sector could help achieve Scotland's poverty reduction targets. Ensuring that an intersectional gender budget analysis is used in the delivery of the vision from this strategy will be critical to its ability to work to tackle inequalities.

Additionally, there are several mentions of jobs and reskilling within the vision chapter. However, there is a missed opportunity to set out in the vision that, as well as transitioning those jobs from the existing high-carbon energy sector into renewables, the Just Transition Energy Strategy should also aim at opening up this traditionally male dominated sector. This would in turn help tackle gender segregation in the labour market, which would result in greater gender equality.

SWBG would therefore like to see recognition within the vision for 2030 of tackling inequality from the strategy and for some detail of what this means to be included.

#### 2. What more can be done to deliver benefits from the transition to net zero for households and businesses across Scotland?

When considering household measures it is important to recognise that women are typically less likely to be homeowners, more likely to rent and have complex intersecting experiences of homelessness. SWBG recently conducted our 2023 Women's Survey which asked specific questions around energy efficiency measures and whether women have access to these in their current housing situation. When considering larger household measures to reduce energy usage such as increased insulation, changing heating systems or installing solar panels the majority of respondents to our survey had not undertaken any of these actions. Reasons identified for not undertaking actions included delayed action from Housing Associations, private landlords unwilling to make basic improvements let alone moves for more substantial energy efficiency, low income and living in poverty requiring different daily needs to be prioritised. Recognising the differing needs across Scotland's population and working to prioritise tackling inequalities through the transition to net zero is critical to delivering greater benefits to households. SWBG would advocate the use of gender budget analysis within the policy making process to ensure the benefits of change will reach those most in need.

The principle aim of gender budgeting is to integrate intersectional gender analysis into economic policy, through this process raising awareness of different impacts of women and men of publicly funded policies and programmes and challenging the assumption that

<sup>&</sup>lt;sup>2</sup> Women's Budget Group (2022) 'The gendered impact of the cost of living crisis'

<sup>&</sup>lt;sup>3</sup> Close the Gap (2018) Women, work and poverty in Scotland briefing

budgets are 'gender blind'. Gender analysis of the policy and resource allocation process in budgets/spending plans means examining how budgetary allocations affect the economic and social opportunities of women and men, and restructuring revenue and spending decisions to eliminate unequal gendered outcomes.<sup>4</sup> This analysis would support decision-makers understanding of who benefits were likely to reach and where actions were needed to ensure equitable access to these benefits, both at household and business level.

Further energy support needs to recognise the different heating use amongst households in Scotland including, those living on low incomes, those in rural areas and the need for higher usage in rural Scotland, and higher usage needs for those with disabilities and carers.

In addition to Government support packages, we need to see urgent investment in retrofitting homes and non-domestic buildings, including financing insulation efforts and greening of home heating systems (e.g. heat pump installation), with specific support to social and private renters to reduce energy consumption.<sup>5</sup> This support should be targeted to those on low incomes and recognise different housing needs between urban and rural communities, and amongst people with disabilities, especially when these translate into higher electricity usage. Understanding and addressing the specific energy needs of different social groups will ensure that fairness is engrained in the Strategy, so that this works towards delivering a fairer, more equal Scotland.

The Climate Emergency Skills Action Plan to be published in 2023 needs to incorporate how investment will not only support those transitioning from the high carbon oil and gas sector jobs but also provide detail around how the energy sector will broaden its intake so as not to recreate a male-dominated renewables sector. This can include measures to bring women and marginalised groups into both the energy and the energy efficiency sectors.

#### 3. How can we ensure our approach to supporting community energy is inclusive and that the benefits flow to communities across Scotland?

Including gender analysis is also critical when creating community space for people to come together and develop local solutions. Support will be needed in how to ensure the voices of those less heard are part of the process. This will need to include consideration of who has time to participate in these kind of community spaces and whether those with caring responsibilities may be shut out the process.

Providing communities with guidance about how they can understand the needs of different people within their community to ensure that plans are inclusive and work to tackle inequality is an important part of this process. It is up to Scottish Government and other public bodies supporting the process of community energy delivery to support, fund and provide capacity to building gender and equalities understanding into community delivery.

# 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?

Recognition of the existing inequalities in the labour market, particularly within the energy sector is an important starting point for considering how the just transition can create local, good quality jobs that work towards an equal labour market. As highlighted in other

<sup>&</sup>lt;sup>4</sup> O'Hagan, A. (2018) Gender Budgeting in Scotland – A work in progress

<sup>&</sup>lt;sup>5</sup> https://wbg.org.uk/wp-content/uploads/2023/02/2023-01-Womens-Budget-Group-submission-to-HMT-budget-representation Published.pdf

responses building gender analysis into the planning process will be critical in what is currently a male-dominated workforce. Government effort is needed to tackle the current occupational segregation in the energy workforce. While SWBG wants to see change at pace and understands the need to transition communities that currently depend on fossil fuel energy jobs it appears that all the focus is placed on transitioning the existing workforce. This will replicate the gendered segregation that currently exists in the energy workforce. Alongside transitioning the existing workforce particular efforts and funding is needed to support those who are not currently represented in the workforce to access it and flourish within it. There is a lack of data to date on how funds such as the Green Jobs Fund may be attempting to do this. Without sex-disaggregated intersectional data policy makers will not be able to target funding. Improving data and providing targeted support alongside wider workforce transition are critical elements to building quality, local jobs that have more gender equal access.

We support the recommendation made by the Social Renewal Advisory Board report 'If not now, when?' that the Green Jobs Fund should include a portion to specifically support people from areas of socio-economic deprivation, women, lone parents, those belonging to minority ethnic communities, refugees, disabled people, carers and young people to train for and get green jobs.<sup>6</sup>

SWBG supports more detailed recommendations from Close the Gap as Scotland's expert organisation seeking to tackle women's equality at work.

Finally, the Just Transition Commission set out some cross cutting issues for Just Transition plans to incorporate. One of these cross-cutting issues was the need for investment in social infrastructure as well as physical infrastructure changes. This means investing in already low-carbon local jobs that are vital for sustaining communities, such as care. Incorporating these cross-cutting issues into the sectoral strategies is important to ensure they are not lost. For transitioning communities this will require a whole economy approach to planning just transition, incorporating the need to move energy jobs but investing in good quality, local, green jobs that are wider than the energy sector. Investment in social and child care jobs, creates local, low carbon jobs and widens employment opportunities for those who may have been excluded from the paid workforce directly within the energy sector. Funding for transitioning communities provides an opportunity to build the recommended cross-cutting theme from the Just Transition Commission and build green, caring local economies in Scotland.

#### 27. What further government action is needed to drive energy efficiency and zero emissions heat deployment across Scotland?

Women responding to SWBG's 2023 Women's survey have highlighted some key reasons their household has not taken up energy efficiency measures. This has included lack of action from landlords (both private and social housing), cost and low incomes to pay for change, old buildings which do not accommodate change or are substantially more expensive to change, some respondents cited listed building status and conservation area as a limitation to making change, while other respondents highlighted problems with damp which need to be managed first. Women responding to our survey were worried about additional expense at a time of cost of living rises and were concerned that support came in the form of loans and could lead to problematic debt. Of those who owned their property,

<sup>&</sup>lt;sup>6</sup> Scottish Government (2021) <u>It not now, when? Social Renewal Advisory Board report: January 2021</u>

<sup>&</sup>lt;sup>7</sup> Just Transition Commission (2022) Making the Future – second Just Transition Commission: initial report

some respondents highlighted complex systems for accessing grants or lack or information about support available as a barrier to change.

Respondents who lived in new build properties highlighted satisfaction in levels of energy efficiency, for some this was part of the reason for choosing this property type.

Government action needs to look at how to tackle change within the rented sector market. While plans to work with social landlords may be quite advanced those living in the private rented market highlighted feelings that options for change are very unlikely in a sector motivated by individual profit.

Social and council housing rents in many areas of Scotland are rising. A key justification of this has been to fund energy efficiency projects. National Government has a role to play to ensure that these measures are undertaken equitably. This would mean that public bodies undertaking change conduct Equality Impact Assessments as part of the process to outline how those facing structural inequalities are being supported through the energy efficiency measures. SWBG would recommend that any public, private or third sector body receiving Scottish Government funding to support energy efficiency measures should provide information on how this will impact those with protected characteristics and what measures are being taken to tackle inequalities through the budget spend.

## 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?

A gender and distributional analysis of any proposed changes to tax, fees and charges to pay for transition investment is needed to consider the differing impacts on women and men, those on low incomes, and variations across age. This analysis is key to delivering policies that work towards equality and needs to be established within decision making processes to ensure that flexible models continue to make use of necessary data and analysis.

How our revenue is generated has an important role to play in tackling inequality. Just like decisions on how best to spend public money, decisions about how best to raise public funds through tax can affect women and men differently. Additionally, regressive taxes place greater pressure on those on lower incomes, with wealthy men the most likely to benefit. Women make up a higher proportion of those on low incomes and therefore tax changes to realise a more progressive tax system will improve efforts towards gender equality. Understanding these effects and analysis is needed in decision making and prioritisation process. While Scotland does not hold the levers of power on all tax decisions there is more that could be done to realise a progressive tax regime in Scotland.

A gender budgeting approach to the tax system analyses how the tax system can be used to promote equality in society more widely. This means ensuring that the necessary data and analysis are brought into the decision-making process to consider the differing impacts of tax decisions on men and women, the differing experiences faced by women, and how those decisions can work to promote equality.

To ensure the transition to net zero is just building in this analysis of how elements should be paid for is critical to tackling existing inequalities. SWBG joined with other organisations in highlighting that those who have the greatest capacity to pay and those who are the highest emitters must pay their fair share of tax.

### 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?

While developing the net zero transport system it is crucial that the Scottish Government takes a gender budgeting approach to developing detailed plans. By making this approach intersectional it can focus on support for those least able to pay but also understanding how the transport system does or does not currently work to meet their needs.

Women are more likely than men to have low incomes, be in part-time and/or precarious work and live in poverty. These gender disparities can be compounded by race and disability. Gender is one of the most robust determinants of journey purpose and mode, yet it is markedly absent in transport planning processes. For example, women typically make more frequent, shorter journeys throughout the day due to domestic and caring responsibilities, whereas men typically make fewer but longer work-related journeys during peak hours. However, transport systems are built to optimise longer distance, work commutes during peak hours. Without an explicit consideration of issues around gender, diversity, and inclusion, transport planning and delivery risks continuing to embed inequalities within the system. For example, women typically make

When transitioning to a net zero transport system, intersectional gender considerations need to be built into the planning process to understand how public spending might be working to tackle or entrench existing inequalities and poor access to travel. This includes considering the investment levels of different modes of travel. As is well documented by the Scottish Government in the Equality and Fairer Scotland Budget Statement, women are more likely to travel by bus. Yet, recent policy announcements have focused on reducing peak time train fares – there is no publicly available Equality Impact Assessment for this proposal so it is unclear how inequalities in access to transport mode have been considered within the budget spend allocation. SWBG would recommend that similar measures are taken to reduce bus fares and improve access for those least able to pay. This could include expanding free public transport to those in receipt of benefits, including Carers Allowance. Alongside improving access to public transport, and in particular buses, improvements to routes and reliability of services were highlighted by women responding to the SWBG Women's Survey 2023.

The SWBG reviewed Local Authority Budget decisions for 2023-24 and found that several areas are making reductions to community bus and dial a bus services. This is a backward step as we move to net-zero transport systems. Adequate funding to local authorities will be a critical part of delivering a just transition.

Gender budget analysis is also necessary within active travel investment, which is to be a growing part of the net-zero transport system. At present white, middle-class men are more likely to access active travel routes across Scotland (established from various Sustrans sources/data). With investment in active travel growing as part of the process of transitioning to net zero SWBG would expect to see details in the transport strategy of how this unequal access to infrastructure will be tackled. SWBG would recommend that this includes a robust system of equality impact assessments on route funding, support to local authorities and those delivering active travel projects to fully understand the potential for tackling inequality

<sup>&</sup>lt;sup>8</sup> International Transport Forum, 2021, Transport Innovation for Sustainable Development: A Gender Perspective http://bitly.ws/ctem

<sup>&</sup>lt;sup>9</sup> Women4Climate, 2019, Gender Inclusive Climate Action in Cities <a href="http://bitly.ws/cteq">http://bitly.ws/cteq</a>

<sup>&</sup>lt;sup>10</sup> Women's Budget Group (2021) Towards Gender Inclusive and Sustainable Transport Systems

through active travel and recognition that widening access goes beyond building pathways and requires investment to support people onto bikes.

## 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?

Alongside public sector decarbonisation, support for voluntary sector decarbonisation. This would support organisations to reduce energy costs at the same time as reducing emissions. A prioritised approach could work to tackle inequalities as part of the approach, for example prioritising social care support settings, women's refuges and disabled people's services.

#### Impact assessment questions

#### 44. Could any of the proposals set out in this strategy unfairly discriminate against any person in Scotland who shares a protected characteristic?

As previous answers in this consultation have highlighted there is a serious risk that just transition planning in the energy sector could entrench, rather than tackle, existing inequalities in relation to sex, disability and race, as well as socio-economic background. The risk is that new systems will embed these existing inequalities rather than build in measures to tackle them from the outset. Equalities analysis is not something to be tacked on at the end of the planning process but is critical throughout the planning process and on into the monitoring and evaluation processes.

No equalities impact assessment is publicly available as part of this strategy, so it is unclear how much equalities issues are being factored into decision making. Equality Impact Assessments should be conducted at an early stage in projects as well as when greater detail is being worked out. However, some key stakeholder groups have been engaged including groups representing those from ethnic minority communities and a wider equalities stakeholder engagement event. Outside this wider event there does not appear to have been specific engagement with women's rights or disability rights organisations. These are two protected characteristics that the proposal could impact on either positively or negatively depending how the details of the plans are developed. For this reason, SWBG recommends that the Scottish Government takes an intersectional gender budget approach to developing the details of this strategy.

Taking an intersectional gender analysis approach to targeting spending in its budget to achieve a just transition will be critical to building equality into the changing economy. Using the tools of gender budgeting and understanding how decisions affect women and men differently because of their different experiences in family and household structures; paid employment and unpaid work; and caring and provisioning for others, to inform the decision-making process. Inequalities based on gender intersect with other forms of inequality based on class, race, disability and other factors so that some groups of women, particularly poor women, women from minority ethnic communities and disabled women face multiple disadvantages.

In order to support this analysis sex-disaggregated data and data disaggregated by other sociodemographic characteristics, such as socioeconomic status, race/ethnicity, age, disability, gender identity and sexual orientation, needs to be incorporated into policy making and the process of complete equality impact assessments.

What is gender budgeting?

The principle aim of gender budgeting is to integrate intersectional gender analysis into economic policy, through this process raising awareness of different impacts of women and men of publicly funded policies and programmes and challenging the assumption that budgets are 'gender blind'. Gender analysis of the policy and resource allocation process in the budget means examining how budgetary allocations affect the economic and social opportunities of women and men, and restructuring revenue and spending decisions to eliminate unequal gendered outcomes.<sup>11</sup>

The Equality Budget Advisory Group has provided analysis and recommendations on equality and human rights budgeting for 2021-2026 parliamentary session. These recommendations can be found: <a href="https://www.gov.scot/publications/equality-budget-advisory-group-recommendations-for-equality-and-human-rights-budgeting---2021-2026-parliamentary-session/pages/introduction/">https://www.gov.scot/publications/equality-budget-advisory-group-recommendations-for-equality-and-human-rights-budgeting---2021-2026-parliamentary-session/pages/introduction/</a> Recommendations relating to building capacity and supporting staff delivery of equalities analysis would be relevant to further development of the Just Transition Energy Strategy.

# 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?

As highlighted in the answer above taking an intersectional gender analysis approach will improve consideration of potential negative cost impacts of the net zero transition and how to mitigate these.

Some areas to consider as potential additional challenges:

- Are additional unpaid work responsibilities being put on households to respond to the net zero transition? If so, what are the expectations of the division of this unpaid work, considering the existing pattern of women undertaking significantly more unpaid work than men at present?
- What consideration has been given for early delivery of energy efficiency programmes to households with higher energy needs, particularly for those with disabilities and unpaid carers?
- Are support schemes to household transition being delivered through loans? What
  does this mean for those on low incomes or with previous negative experiences of
  debt? How will those on lowest incomes be supported without having to fall into
  debt?

### 47. Is there further action we can take to ensure the strategy best supports the development of more opportunities for young people?

Again, gender budget analysis can support consideration for the development of more opportunities for young people. This is important to ensure that the opportunities for young people work to tackle existing inequalities, especially in the labour market around energy supply and efficiency.

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<sup>&</sup>lt;sup>11</sup> O'Hagan, A. (2018) Gender Budgeting in Scotland – A work in progress

We have seen in previous programmes that a lack of equalities analysis in initial roll out of programmes has built inequalities into the system. This was well researched in relation to Modern Apprenticeships. While action has since been taken to counteract the inequalities within the early modern apprenticeship schemes this remains a work in progress with young women more likely to be undertaking lower-level qualifications and moving into lower paid sectors. It would be much better to build a fair system from the outset and the just transition offers a strong opportunity if the right analysis and engagement is built into the process.

<sup>12</sup> Campbell et al (2005) How 'Modern' is the Modern Apprenticeship