



Law Society  
of Scotland

# Consultation response

## Domestic maritime decarbonisation: the course to net zero emissions

October 2022



## Introduction

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The Law Society of Scotland is the professional body for over 12,000 Scottish solicitors.

We are a regulator that sets and enforces standards for the solicitor profession which helps people in need and supports business in Scotland, the UK and overseas. We support solicitors and drive change to ensure Scotland has a strong, successful and diverse legal profession. We represent our members and wider society when speaking out on human rights and the rule of law. We also seek to influence changes to legislation and the operation of our justice system as part of our work towards a fairer and more just society.

Our Marine Law Sub-committee welcomes the opportunity to respond to the Department for Transport's consultation on *Domestic maritime decarbonisation: the course to net zero emissions*<sup>1</sup>. We do not seek to answer the consultation questions but have the following comments to put forward for consideration.

## General comments

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We support the ambitions set out in the consultation paper to decarbonise the domestic maritime sector and note the importance of doing so in a way which reflects 'just transition' principles. However, we note that the paper only covers emissions at source and does not include upstream emissions. This means that the proposals are limited in scope and do not appear to fully reflect the actions needed to achieve decarbonisation of the maritime sector.

Figure 1 on page 7 of the consultation document sets out estimated GHG emissions from UK domestic maritime vessels by ship type. Figure 3 on page 18 shows the estimated proportion of energy demand from UK domestic maritime vessels met by alternative low or zero emission fuels between 2020 and 2050 under the central Net Zero Strategy pathway. We consider that these diagrams taken together may not be fully reflective of the short-sea sector. The emissions for ammonia and electricity detailed in figure 3 seem to be at odds with the expected balance of energy use – for example, all new generation small ferries to be used in Scotland in coming years are expected to use electricity and an energy source; Roll-on/Roll-off vessels are shown to be a significant emitter compared to other vessels based on figure 1, and therefore this does not appear to match with the low estimates for expected electricity demand and the high estimates for ammonia. We are aware of industry stakeholders that have undertaken work to estimate future energy mix and are expecting much higher electricity demand than as estimated in the consultation paper.

We note the reference at page 38 to the regulatory processes for new technologies and alternative fuels and energies. While we recognise the need for such processes to ensure the health, safety and security of those in the sector as well as the wider public and environment, we understand that regulatory and legislative barriers are a challenge to the deployment of new fuels and are an active barrier to the use of these in the maritime sector. We support greater co-ordination among regulators and consideration of possible amendments to

<sup>1</sup> <https://www.gov.uk/government/consultations/domestic-maritime-decarbonisation-the-course-to-net-zero-emissions>



existing processes to help expedite decarbonisation without sacrificing safety and security standards. We note that the reference in the paper to 'Health and Safety England' appears to be incorrect – we presume this should be 'Health and Safety Executive'.

**For further information, please contact:**

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