



# MODERN SCOT

Distinctly Scottish



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# CONTENTS

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## TRANSPORT

|                                                                                                              |   |
|--------------------------------------------------------------------------------------------------------------|---|
| Public Money, Private Shortlist: CMAL Will Not Name the Shipyards Bidding for Scotland's Next Lifeline Ferry | 1 |
|--------------------------------------------------------------------------------------------------------------|---|

## ENVIRONMENT

|                                                                                                        |   |
|--------------------------------------------------------------------------------------------------------|---|
| Scotland's 3G Pitches May Lose Up to 1,772 Tonnes of Microplastic a Year as New Sites Are Still Funded | 8 |
|--------------------------------------------------------------------------------------------------------|---|

## POLICY AND GOVERNMENT

|                                                                                                             |    |
|-------------------------------------------------------------------------------------------------------------|----|
| Your NHS Records, Tissue and DNA: When Scotland Can Share Them, and How Companies Can Profit From Their Use | 20 |
|-------------------------------------------------------------------------------------------------------------|----|

## TRANSPORT

|                                                                                      |    |
|--------------------------------------------------------------------------------------|----|
| Following a Global Climate Agenda: Scotland's £2 Buses to Push Travel Away From Cars | 33 |
|--------------------------------------------------------------------------------------|----|

## ENVIRONMENT

|                                                                     |    |
|---------------------------------------------------------------------|----|
| Scotland Knows the Pesticides It Uses, But Less About Where They Go | 41 |
|---------------------------------------------------------------------|----|

## INFRASTRUCTURE

|                                                                                                |    |
|------------------------------------------------------------------------------------------------|----|
| New Report Proposes Moving Scotland's School-Education Functions Out of 32 Council Authorities | 49 |
|------------------------------------------------------------------------------------------------|----|

## POLICY AND GOVERNMENT

|                                                                  |    |
|------------------------------------------------------------------|----|
| COSLA Tells Ministers Council Reform Must Be Agreed, Not Imposed | 55 |
|------------------------------------------------------------------|----|

## ECONOMY

|                                                                                                               |    |
|---------------------------------------------------------------------------------------------------------------|----|
| The EU Antimicrobial Restriction on Brazilian Meat Is Now in Force. Great Britain Still Allows Brazilian Beef | 59 |
|---------------------------------------------------------------------------------------------------------------|----|

## ECONOMY

|                                                                                             |    |
|---------------------------------------------------------------------------------------------|----|
| After Scotland Lost Hundreds of Bank Branches, Shared Hubs Are Building a Different Network | 63 |
|---------------------------------------------------------------------------------------------|----|

## COMMUNITY

|                                                                                                 |    |
|-------------------------------------------------------------------------------------------------|----|
| Scotland's Wastewater-Drug Monitoring Decision Returns to View After Nitazenes Reach 247 Deaths | 67 |
|-------------------------------------------------------------------------------------------------|----|

## ECONOMY

|                                                                               |    |
|-------------------------------------------------------------------------------|----|
| Great British Energy Had No Direct Employees in March. By September It Had 55 | 71 |
|-------------------------------------------------------------------------------|----|

## POLICY AND GOVERNMENT

|                                                                              |    |
|------------------------------------------------------------------------------|----|
| Scotland's Digital ID: ScotAccount Uses Experian, Cifas and Biometric Checks | 75 |
|------------------------------------------------------------------------------|----|

## HIGHLAND

|                                                                            |    |
|----------------------------------------------------------------------------|----|
| Highland Sends Two More Short-Term Let Control Areas to Scottish Ministers | 83 |
|----------------------------------------------------------------------------|----|

## ENERGY

|                                                                                           |    |
|-------------------------------------------------------------------------------------------|----|
| Scotland Has a 32.8GW Battery Pipeline as Ofgem Proposes a Financial Test for Grid Places | 86 |
|-------------------------------------------------------------------------------------------|----|

## ENERGY

|                                                                                         |    |
|-----------------------------------------------------------------------------------------|----|
| Electricity VAT Falls to Zero on 1 October, Yet Ofgem's Typical Dual-Fuel Cap Rises £60 | 92 |
|-----------------------------------------------------------------------------------------|----|

## POLICY AND GOVERNMENT

|                                                                                                       |    |
|-------------------------------------------------------------------------------------------------------|----|
| Scotland Has No Compulsory Sale Order — and England's Six-Month Empty-Home Reform Does Not Apply Here | 98 |
|-------------------------------------------------------------------------------------------------------|----|

## HERITAGE AND ARTS

|                                                                        |     |
|------------------------------------------------------------------------|-----|
| When Scotland Made Christmas a Working Day: Yule Customs That Survived | 103 |
|------------------------------------------------------------------------|-----|

## HERITAGE AND ARTS

|                                                            |     |
|------------------------------------------------------------|-----|
| The Highland Scots Who Opposed Slavery in Colonial America | 111 |
|------------------------------------------------------------|-----|

## TEA WITH GUNNS

|                                                                                   |     |
|-----------------------------------------------------------------------------------|-----|
| Artificial Intelligence Is Coming for Humanity, Just After It Finishes This Email | 119 |
|-----------------------------------------------------------------------------------|-----|

TRANSPORT | 1 October 2026

# Public Money, Private Shortlist: CMAL Will Not Name the Shipyards Bidding for Scotland's Next Lifeline Ferry

Read online: <https://modern.scot/public-money-private-shortlist-cmal-will-not-name-the-shipyards-bidding-for-scotlands-next-lifeline-ferry/>



Scotland's publicly owned ferry buyer is defending a decision not to reveal which shipyards are competing to build the replacement for the 36-year-old MV Lord of the Isles. Ferguson Marine, another company owned by the Scottish Government, is outside the competition. The tender makes community benefits non-mandatory and non-scored. Ministers say confidentiality protects competition and taxpayers. The result is that the public may not know where Scotland's next major lifeline

ferry could be built until the procurement is effectively decided.

Scotland is procuring another major lifeline ferry, but the public will not be told which shipyards are competing for the work while the tender is under way.

The position was challenged in the Scottish Parliament on 30 September, when ministers were asked about reports that Caledonian Maritime Assets Ltd would no longer publish the names or locations of shipyards bidding for the replacement of MV Lord of the Isles or for future vessel contracts.

Economy, Tourism and Transport Secretary Stephen Flynn did not reject that description of CMAL's approach. He said decisions about publication rested with CMAL and that the organisation had to balance openness and transparency against commercial sensitivity, fair competition and value for taxpayers. It deserves examination because CMAL is not a private shipowner spending private money.

It is wholly owned by the Scottish Government. Scottish Ministers are its sole shareholders. It owns vessels and infrastructure used to provide lifeline ferry services, and it is itself a public authority subject to the Freedom of Information (Scotland) Act 2002.

The ship it is replacing carries people, vehicles and goods between Mallaig and Lochboisdale. The existing Lord of the Isles entered service in May 1989. An independent assurance review obtained through freedom-of-information legislation described it as already beyond the 30-year normal serviceable life assumed for the fleet and 36 years old when the review was written.

This is therefore not an obscure commercial purchase.

It is public procurement of infrastructure on which an island community depends.

## The public authority behind the tender

CMAL formally launched the procurement on 1 April.

The contract is for the detailed design and construction of one passenger-and-vehicle ferry for the Mallaig–Lochboisdale service. It is being conducted as a restricted procedure: interested shipyards first have to pass the selection stage, after which no more than six of the highest-ranked candidates can proceed to the full tender. The published contract duration is 34 months.

CMAL will place its own project manager and site team in whichever shipyard wins, overseeing design, construction and commissioning. The procurement is covered by the Government Procurement Agreement, reflecting the international procurement framework within which the competition is being conducted.

What the public notice does not reveal is who has survived the first stage.

Those names now matter for reasons extending well beyond ordinary commercial curiosity.

Scotland is simultaneously trying to sustain a publicly owned shipbuilding business at Port Glasgow.

Ferguson Marine was brought into public ownership after the collapse of its former owner. The Scottish Government has repeatedly said it wants the yard to become commercially sustainable, retain skilled employment and build a reliable pipeline of work. In March ministers proposed directly awarding four publicly funded vessels to Ferguson — two small ferries, a replacement research vessel and a fisheries-protection vessel — subject to legal, commercial and subsidy-control requirements.

But Ferguson is not competing for Lord of the Isles.

## **Scotland owns a shipyard that is outside the competition**

The position was stated plainly at the Scottish Parliament’s Transport Committee on 9 September.

Donald MacKinnon MSP described Ferguson Marine as having been excluded from the bidding process for the Lord of the Isles replacement and asked whether the procurement remained on schedule. Flynn replied that, on the information available to him, everything remained on track. He did not dispute the description of Ferguson’s position.

The GMB union has said the problem lies in CMAL’s qualification criteria. According to the union, bidders were required to demonstrate recent delivery of at least two vessels longer than 75 metres within the previous five years. Ferguson had completed Glen Sannox, but Glen Rosa remained under construction, leaving the yard unable to satisfy that threshold. That account comes from the union rather than from the publicly accessible contract notice, which refers bidders to separate tender documentation for the detailed technical criteria.

There is a rational procurement argument for requiring recent evidence of successful ship delivery.

Scotland’s ferry programme has already experienced severe delays and cost overruns. Island communities have a direct interest in CMAL selecting a yard capable of delivering a reliable vessel on time.

There is also an equally real industrial-policy problem.

A shipyard that needs contracts to establish a record of recent delivery can struggle to satisfy procurement rules requiring that recent record before it is allowed to compete for those contracts.

The Scottish Government itself has acknowledged the circular problem from another direction. Flynn told the Transport Committee that Ferguson needs to deliver vessels on time and on budget in order to demonstrate to the wider market that it can do so and thereby attract commercial work.

Scotland therefore owns a shipyard because ministers consider retaining commercial shipbuilding capability important. It is considering direct awards to provide that yard with work. Yet the same publicly funded ferry system is conducting a separate major procurement for which that yard is outside the competition.

And the public is not being told which yards are inside it.

## **Community benefit will not decide the winner**

The published tender notice contains another significant detail.

CMAL says community benefits are included in the procurement, but it does not intend to impose mandatory community-benefit requirements because delivery and acceptance of the vessel will occur at the shipyard where it is built.

Bidders are invited to propose benefits such as apprenticeships and student outreach.

But those proposals are explicitly described as a “non-scored response”.

That means the community-benefit submission identified in the public notice does not itself earn marks in the competition.

The notice does not establish that wider economic considerations are absent from every part of the detailed tender documents; those award criteria are contained in procurement material not reproduced in the public notice. What can be stated from the published record is narrower and important: there is no mandatory community-benefit requirement in the contract notice, and the community-benefit proposal is non-scored.

The same notice lists the delivery location as “Outside Scotland”.

That field should not by itself be read as proof that CMAL has predetermined a foreign winner. It does, however, underline the international nature of the procurement and makes the identity and location of the shortlisted yards a matter of obvious public interest.

## **Scotland has already sent major ferry construction overseas**

There is nothing hypothetical about Scotland purchasing publicly funded ferries from foreign shipyards.

CMAL’s four-vessel Islay and Little Minch programme has been under construction at Cemre in Turkey. Seven smaller electric ferries are being built by Remontowa in Poland.

In March this year, CMAL awarded the contract for two Northern Isles freight-flex ferries to Guangzhou Shipyard International in China.

The formal Public Contracts Scotland award notice records a contract value of £175 million excluding VAT. It records four tenders, all from non-EU bidders, with Guangzhou Shipyard International named as the successful contractor.

CMAL says that procurement was evaluated 70 per cent on technical criteria and 30 per cent on financial criteria and that the Chinese yard achieved the highest combined score.

That award may have satisfied CMAL’s evaluation. It also moved another large block of publicly financed vessel construction outside Scotland and outside the UK.

The question now is whether Lord of the Isles will follow the same pattern.

Until CMAL identifies the shortlisted yards, the public cannot know.

## **Westminster has moved in the opposite direction on shipbuilding procurement**

The confidentiality dispute has arrived just as UK procurement policy has begun treating domestic shipbuilding capacity more explicitly as a strategic issue.

In June, the UK Government issued Procurement Policy Note 025, identifying shipbuilding as one of four sectors considered critical to national security. The guidance says shipbuilding capability and capacity should be sustained so skilled workers and facilities remain available during periods of high national demand, including crises and war. It encourages the use of procurement to shape and preserve that capability.

Paul Sweeney invoked that policy in Parliament when challenging CMAL's decision.

There is an important legal qualification. The UK note applies directly to specified UK central-government organisations; it does not automatically impose its procurement rules on CMAL simply because shipbuilding appears within it. Scotland operates its own devolved public-procurement regime.

The significance is therefore not that CMAL has necessarily breached that UK policy.

It is the policy contrast.

One government is explicitly reframing commercial shipbuilding capacity as strategic infrastructure whose survival may justify a more interventionist procurement approach. Scotland, meanwhile, owns its last major commercial Clyde shipyard, is trying to secure work for it through separate direct awards, but is proceeding with a major lifeline-ferry competition in which that yard is outside the contest and the competing yards are not being disclosed.

## **Commercial confidentiality is real, but it is not unlimited**

There is a legitimate case for protecting information during a live tender.

Scottish procurement guidance recognises that public authorities must protect information genuinely designated as confidential by bidders. Premature disclosure can damage commercial interests or interfere with competition.

That is the principle on which ministers are relying.

But Scottish freedom-of-information guidance also makes clear that "commercial confidentiality" is not an automatic blanket.

The Scottish Ministers' current Section 60 FOI code says authorities cannot simply accept confidentiality claims without scrutiny. Where the commercial-interests exemption is relied upon, the authority must be able to demonstrate real, actual and significant harm from disclosure. It also notes that information may be sensitive while a tender is live but cease to be sensitive once the contract is awarded.

CMAL itself tells the public that, as an organisation wholly owned by Scottish Ministers, it is subject to freedom-of-information law. Its publication scheme says people should be able to access information concerning the cost and standard of services, facts forming the basis of decisions, matters of public importance and reasons for decisions.

That does not give the public an automatic legal right to every bidder's identity at every stage.

It does make the balance between confidentiality and accountability a legitimate question for a publicly owned procurement body handling lifeline infrastructure.

## **The minister could have demanded more transparency**

When challenged on 30 September, Flynn placed responsibility for publication with CMAL.

He said CMAL should balance openness with commercial sensitivity and fair procurement. When asked directly to order publication of the shortlist, he did not do so. Instead, he defended the approach as protecting fair competition and securing value for island communities.

That is the Government's position.

But describing CMAL as the procuring authority does not make it institutionally remote from government.

Scottish Ministers are its sole shareholders. Transport Scotland sponsors it on their behalf. Ministers determine ferry policy and fund the wider investment programme within which these vessels are acquired.

The separation of procurement functions has legal and operational importance. It should not obscure ownership or political accountability.

## **Two publicly owned organisations, two different directions**

The contradiction is now difficult to avoid.

Scottish ministers own CMAL.

Scottish ministers own Ferguson Marine.

They say Ferguson needs a credible pipeline of work in order to become sustainable.

They are considering direct awards because of that need.

At the same time, Ferguson sits outside the competition for another publicly financed Scottish ferry.

CMAL's tender says community benefits are non-mandatory and non-scored.

The published procurement record lists delivery outside Scotland.

And the Government is defending a position under which the public will not be told during the competition which shipyards may receive the work.

None of those facts establishes corruption, criminal conduct or an unlawful procurement.

They establish a significant accountability problem.

If the winning yard ultimately offers the strongest technical performance and best overall value, CMAL will be entitled to demonstrate that when the contract is awarded.

But scrutiny after a decision is not the same thing as scrutiny while policy choices are still being made.

## The island cannot wait indefinitely

There is also a public interest on the other side which cannot be dismissed.

South Uist needs the vessel.

The existing Lord of the Isles has exceeded the normal 30-year service-life assumption used in fleet planning. The independent assurance review described the case for investment as replacement of a life-expired asset together with improvements to reliability, capacity and emissions.

Transport Scotland's Islands Connectivity Plan previously put the earliest estimated delivery of the replacement at the end of 2028, subject to funding and procurement.

Stopping the procurement merely to reopen the industrial-policy argument would carry its own cost. Delay would leave an island community relying longer on an ageing fleet.

The public interest therefore has more than one component: a reliable ferry delivered without another prolonged procurement failure; prudent use of public money; protection of Scottish industrial capability where that can be justified; and sufficient transparency for Parliament and taxpayers to understand how those competing priorities were balanced.

That is precisely why keeping the shortlist from public view matters.

## What taxpayers still cannot see

The public procurement notice tells Scotland that up to six bidders can reach the tender stage.

It tells Scotland the project will last 34 months.

It tells Scotland that CMAL will supervise construction inside the winning shipyard.

It tells Scotland that community benefits are not mandatory and will not be scored.

It even identifies the delivery location as outside Scotland.

What it does not tell Scotland is which shipyards are actually competing for the ferry.

That information is particularly consequential because Scotland is simultaneously spending public money trying to preserve a domestic shipbuilding capability which is not participating in this contest.

CMAL and ministers argue that non-disclosure protects competition.

The test of that position will come when the competition ends.

At that point, taxpayers should be able to see considerably more than the winning yard's name. The public interest will extend to who competed, why candidates qualified or failed to qualify, the final evaluation methodology, the technical and financial scores that can lawfully be released, the treatment of Scottish economic benefit, the reasons for the successful decision and the evidence on which claims of value for money are based.

Until then, Scotland is being asked to accept an unusual arrangement on trust.

A publicly owned company is purchasing a lifeline vessel with public money. Another publicly owned company that ministers say they want to save is not competing for it. The work may again go overseas.

And during the process, the identities of those seeking the contract remain behind the procurement wall.

## Sources

Meeting of the Parliament — CMAL Procurement Processes — Scottish Parliament, 30 September 2026.

Transport Committee — Programme for Government — Scottish Parliament, 9 September 2026.

Shipyard Detailed Design and Build Contract RoPax Vessel, CMAL0335 — Public Contracts Scotland, 1 April 2026.

About Us — Caledonian Maritime Assets Ltd.

Freedom of Information — Caledonian Maritime Assets Ltd.

Investing in Ferguson Marine — Scottish Government, 3 March 2026.

Ferguson Marine: Deputy First Minister's statement — Scottish Government, March 2026.

Contract Award Notice: Northern Isles Freight Flex Ro-Pax Vessels — Public Contracts Scotland, 8 June 2026.

Contract Signed for Northern Isles Freight Flex Vessels — Caledonian Maritime Assets Ltd, 17 March 2026.

Mallaig–Lochboisdale New Vessel Gateway Review — Scottish Government / Independent Assurance Review, released 2026.

Islands Connectivity Plan: Vessels and Ports Plan 2025–2045 — Transport Scotland.

PPN 025: Protecting the UK's National Security Through Public Procurement — UK Cabinet Office, June 2026.

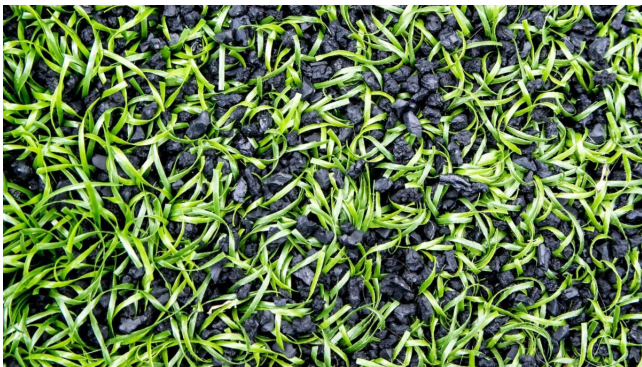
FOI/EIR Section 60 Code of Practice — Scottish Government, 2026.

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ENVIRONMENT | 27 September 2026

# Scotland's 3G Pitches May Lose Up to 1,772 Tonnes of Microplastic a Year as New Sites Are Still Funded

Read online: <https://modern.scot/scotlands-3g-pitches-may-lose-up-to-1772-tonnes-of-microplastic-a-year-as-new-sites-are-still-funded/>



Artificial football turf in Scotland may be losing between 443 and 1,772 tonnes of microplastic into the environment every year.

The estimate comes from work cited by Environmental Standards Scotland. It is not a measured national total. The regulator says Scottish field evidence remains limited and that many estimates of loss from artificial turf have not been verified empirically.

The material being lost is nevertheless known.

Many third-generation artificial pitches use loose rubber granules between synthetic grass fibres. The granules are commonly manufactured from shredded end-of-life vehicle tyres. They keep the plastic blades upright, alter ball behaviour and provide cushioning underfoot.

They also leave the pitch.

Environmental Standards Scotland records estimates that as much as half of artificial-turf infill may ultimately be lost to the wider environment. It also cites estimates suggesting that between five and ten per cent of the synthetic grass fibres themselves may be lost through wear and tear.

The same pitches have become an important part of Scotland's sporting infrastructure.

The Scottish FA reported approximately 300 full-size 3G pitches by 2018, almost three times the number recorded seven years earlier. Its current £50 million Pitching In programme aims to upgrade as many as 50 existing 3G pitches and construct up to 40 new ones by 2030.

In September 2026, sportscotland announced another £5 million for sports facilities, doubling the amount available through its fund over two years to £10 million. Several of the projects receiving support include new 3G pitches.

Not every artificial pitch uses tyre-derived rubber, and the funding announcements do not establish that every new Scottish facility will use it.

There is, however, no Scottish prohibition on the continued use of rubber crumb.

The European Union has already established one. From 17 October 2031, granular polymeric infill for synthetic sports surfaces will no longer be permitted to be placed on the EU market under the restriction on intentionally added microplastics.

Scotland is outside that system.

Great Britain now operates under UK REACH rather than EU REACH. Had Scotland remained subject to EU REACH, the 2031 restriction would apply here. Under the current Great Britain system, no equivalent phase-out date has yet been adopted.

## Where the rubber goes

A modern 3G football pitch can contain tens of tonnes of loose infill, and some full-size systems contain more than 100 tonnes.

The material does not remain permanently between the synthetic grass fibres.

Granules can be carried from the playing surface on boots, socks, clothing and maintenance machinery. They can accumulate around entrances and pitch edges, move into adjoining soil, enter drains during rainfall, be displaced during cleaning or snow removal, and escape when infill is stored, replenished or removed.

Operators periodically add new infill because material is lost from the playing surface during its working life.

Scottish environmental research has examined these pathways for years. A Scottish Government study published in 2020 identified artificial grass pitches as part of Scotland's marine-plastic value chain and described microplastic loss during use, maintenance and end-of-life handling.

Environmental Standards Scotland later reported that artificial turf infill can move through soils and sewer systems and into receiving surface waters.

The national estimate of 443 to 1,772 tonnes a year remains a modelled range rather than a measured total. Environmental Standards Scotland has said that very little Scottish evidence exists to establish precisely how much artificial-turf material reaches the marine environment.

Scotland therefore has estimates of annual loss but no national measurement programme recording the mass leaving individual pitches.

## The plastic does not stop with the black granules

Changing the infill does not remove all microplastic generation from artificial turf.

The grass itself is synthetic.

Repeated contact with footwear, maintenance machinery, sunlight and weather abrades the fibres. Environmental Standards Scotland cites estimates that approximately five to ten per cent of those fibres may be lost over the life of a surface.

A pitch using cork, corn cob or another non-plastic infill therefore avoids one large source of deliberately added microplastic while retaining a synthetic carpet capable of shedding plastic fibres.

Artificial turf consequently presents two separate material-loss problems: loose infill and the gradual wear of the synthetic surface itself.

## What tyre crumb contains

Rubber crumb made from vehicle tyres is chemically more complicated than an inert piece of plastic.

Tyres are manufactured to withstand friction, heat, oxygen, ozone, sunlight and mechanical stress. Their formulation includes antioxidants, vulcanisation compounds, fillers, oils, metals and other additives.

Scientific studies of recycled tyre rubber used on sports fields and playgrounds have identified polycyclic aromatic hydrocarbons, metals, benzothiazoles, vulcanisation chemicals and other tyre-derived substances.

A 2024 study published in Science of the Total Environment analysed recycled tyre rubber taken from playing surfaces. It found emerging tyre-related compounds across the rubber surfaces examined, including the antioxidant 6PPD.

In new synthetic-field material, 6PPD reached concentrations of up to 0.2 per cent by weight.

The study also detected 6PPD-quinone, a transformation product formed when 6PPD reacts with oxidants such as ozone. Alternative infill materials examined in the same research contained substantially fewer of the target tyre-derived compounds.

6PPD-quinone has attracted extensive scientific attention because some salmonid species are exceptionally sensitive to it.

The presence of the chemical in tyre crumb does not establish that Scottish football pitches are causing fish deaths. Scotland does not currently operate a national monitoring programme measuring 6PPD-quinone in drainage from artificial sports pitches.

Research published in 2026 has, however, demonstrated that the compound can leave artificial turf fields in stormwater.

## **Tyre chemicals in pitch drainage**

Researchers at the University of British Columbia collected stormwater directly from drainage systems beneath artificial turf fields and analysed tyre-derived contaminants leaving the surfaces during rainfall.

The study found that crumb-rubber infill released 6PPD-quinone, zinc and copper at higher concentrations than alternative infill materials.

The maximum 6PPD-quinone concentration measured in stormwater draining one artificial field was 130.2 nanograms per litre. The researchers reported that this was more than three times the published median lethal concentration for juvenile coho salmon.

The study was conducted in Canada, not Scotland, and species sensitivity differs between fish. It does not establish equivalent concentrations in Scottish waters.

It does demonstrate that an artificial pitch can act as a continuing point source of tyre-derived chemicals through its drainage system.

The researchers found that release could continue from older material. They estimated that only a small fraction of the total 6PPD within a pitch would be removed through annual stormwater leaching, leaving a large reservoir available for continuing release during the working life of the surface.

They also identified drainage treatment as a potential intervention because artificial pitches are discrete sites with engineered water systems.

## **What children and players are exposed to**

The evidence concerning human health is less settled than the evidence concerning environmental release.

There is no reliable evidence showing that children playing on Scottish 3G pitches are developing cancer or

another specific disease because of tyre-derived crumb.

The limited epidemiological research available has not demonstrated an increased incidence of leukaemia or lymphoma associated with playing on synthetic turf.

A 2025 review of rubber crumb and health outcomes identified only two epidemiological studies directly examining major disease outcomes. Neither found a statistically significant association with leukaemia, non-Hodgkin lymphoma or Hodgkin lymphoma.

The same review found that the epidemiological evidence base remains very small relative to the widespread use of artificial turf and called for longitudinal studies and stronger exposure measurements.

The material itself contains substances to which exposure can occur.

The US Environmental Protection Agency and the Centers for Disease Control and Prevention have carried out one of the largest investigations of recycled tyre crumb used on playing fields.

Their work identified chemicals and metals within the material and examined exposure through inhalation, ingestion and skin contact. The agencies describe the work as exposure characterisation rather than a complete health-risk assessment.

The research therefore establishes routes of human contact without establishing that ordinary use of compliant fields produces a particular disease.

## Particles in the air

Rubber crumb and synthetic turf are also capable of producing airborne particles.

A 2023 study measured crumb-rubber particles in ambient air around artificial turf fields at concentrations ranging from 2.8 to 51.4 micrograms per cubic metre. The researchers subsequently identified particles carrying environmentally persistent free radicals in saliva samples from participants using the surfaces.

The study reported that the abundance of airborne particles tended to increase with the operating age of the playing fields.

A 2026 review in Environmental Geochemistry and Health examined airborne microplastic emissions from synthetic sports surfaces in school environments.

It identified children as a population requiring particular attention because of their physiology and levels of physical activity. The review describes potential exposure to airborne microplastics together with substances including polycyclic aromatic hydrocarbons, metals and endocrine-active compounds.

It also records substantial limitations in the evidence available for child-specific exposure and long-term health outcomes.

Scotland does not routinely monitor airborne microplastic concentrations around school and community artificial pitches.

## Artificial surfaces can also become considerably hotter

Temperature produces another measurable difference between synthetic and natural playing surfaces.

A 2024 systematic review examined 23 studies comparing synthetic sports surfaces with natural grass.

Synthetic surfaces were consistently hotter.

Surface temperatures were between 9.4°C and 33.7°C higher than natural grass in the studies reviewed, while air immediately above synthetic surfaces was generally between 0.5°C and 1.2°C warmer.

The researchers found insufficient evidence to determine whether those differences consistently create a materially greater heat-stress risk for athletes.

Scotland's own 2026 ClimateXChange research on grassroots sport identifies heat stress and dehydration as increasing climate-related concerns while also recording artificial turf as one response to waterlogged natural pitches.

The same Scottish study identifies microplastic pollution, waste generation, reduced biodiversity and soil impacts among the environmental disadvantages associated with artificial surfaces.

## **Europe has set a 2031 date**

The European Union adopted a restriction on intentionally added microplastics in September 2023.

The measure covers granular infill used on synthetic sports surfaces.

Sales of qualifying polymeric infill will cease from 17 October 2031.

The eight-year transition period allows existing installations to continue operating while pitches approach replacement age and sports bodies move towards other infill systems.

The restriction does not require every existing artificial pitch to be removed in 2031.

It prevents the relevant microplastic infill from continuing to be placed on the market after the transition period.

Scotland is not covered because Great Britain left the EU chemicals regime and now operates UK REACH.

The Scottish Government, UK Government and Welsh Government participate in the Great Britain chemicals system, with the Health and Safety Executive acting as the UK REACH agency.

The UK REACH work programme for 2025–26 states that no new restriction workstreams are being initiated during that period.

There is currently no Great Britain date equivalent to the EU's October 2031 restriction on artificial-pitch microplastic infill.

## **The UK evidence Scotland said it was waiting for has now been published**

The issue was raised directly in the Scottish Parliament in March 2024.

Then First Minister Humza Yousaf said the Scottish Government would consider research commissioned by the Department for Environment, Food and Rural Affairs into the wider impacts of microplastics. He said the results would help shape future regulation.

He also referred to the European Union's decision to phase out rubber crumb in 2031 and said sportscotland was exploring alternative artificial-pitch systems and infill products.

The Defra-commissioned research was published in 2025.

It identified synthetic sports surfaces as the largest source of intentionally added microplastic emissions among the UK applications examined.

A peer-reviewed analysis published in 2026 estimated future releases and modelled different regulatory responses. Synthetic sports surfaces remained the largest overall emissions source among the intentionally added microplastic sectors studied.

The modelling found that broad restrictions produced the largest overall reductions in emissions and environmental exposure. Targeted containment around sports surfaces produced smaller total reductions but substantially reduced losses to particular environmental compartments.

The UK research examined intentionally added microplastics. It did not establish that sports pitches are the largest source of all microplastic pollution in Britain. Secondary sources such as tyre wear from road traffic fall outside that comparison.

## **New Scottish 3G pitches are still being planned and funded**

Scotland's artificial-pitch estate is still expanding.

The Scottish FA's Pitching In programme aims to raise £50 million by 2030 for football facilities. Its targets include upgrading as many as 50 existing 3G pitches and increasing the national football footprint by up to 40 new 3G pitches.

The programme combines football funding with government money, philanthropy and other investment.

Sportscotland separately announced another £5 million for sports facilities in September 2026, taking the available fund to £10 million over two years. The awards include projects involving new 3G surfaces.

The announcements do not specify tyre-derived rubber infill for every new pitch.

Scottish public procurement still permits artificial systems using microplastic infill where the relevant specifications and regulations are met.

Some current contracts also involve replenishing existing rubber-crumb surfaces.

Scotland therefore has an established estate requiring maintenance at the same time as public and football-sector programmes are financing additional artificial capacity.

## **Different timetables for different pollutants**

Scotland's Climate Change Plan for 2026–2040 contains more than 150 actions aimed at reducing greenhouse-gas emissions.

The plan includes a policy outcome to phase out the need for new petrol and diesel cars and vans by 2030 and aims for all road vehicles to be zero-emission by 2040.

Vehicle policy and artificial-turf pollution concern different pollutants, environmental pathways and regulatory systems.

Carbon dioxide accumulates globally and drives climate change. Rubber crumb and synthetic fibres create local and regional plastic pollution and can carry other chemical contaminants.

The regulatory timetables are nevertheless different.

Scotland has established dated transitions for road-transport emissions.

It has not established a Scottish phase-out date for loose polymeric infill on artificial sports pitches.

The EU has.

## **Natural turf remains one available option**

Natural grass cannot provide the same intensity of use as an artificial sports surface.

Sportscotland technical guidance indicates that a well-constructed and maintained natural-turf pitch may typically sustain around six to eight hours of use each week.

Artificial surfaces can support many times that level of activity. Scottish climate research cites figures of up to around 80 hours a week.

The difference explains much of the demand for 3G facilities, particularly at schools, football hubs and community sites with large numbers of teams sharing limited space.

Natural turf nevertheless remains an available engineering and procurement option where usage levels, land and drainage permit it.

Natural grass allows infiltration through living soil and does not shed polyethylene grass fibres or require loose polymeric infill.

It has its own environmental costs. Maintenance may involve mowing machinery, fertilisers, irrigation, reseeding, drainage work and, in some cases, pesticides.

Scotland's 2026 ClimateXChange study concludes that artificial surfaces are not necessarily the most appropriate adaptation in every location and records improved natural-turf management as one option for dealing with increasingly wet conditions.

Decisions can therefore involve natural grass, multiple grass pitches, hybrid systems, artificial surfaces with alternative infill and conventional 3G systems.

## **Scotland already has artificial pitches without tyre crumb**

Removing tyre-derived rubber does not require removing artificial football altogether.

Shetland Islands Council commissioned a full-size 3G pitch at Clickimin using biodegradable infill made from sweetcorn cob instead of conventional rubber crumb.

The project cost around £1.46 million and involved funding from Shetland Islands Council, sportscotland, the Scottish FA, Scottish Rugby and local sporting organisations.

The surface was designed for football and rugby and was subsequently tested against the relevant playing standards.

Cork is also used as an infill material on artificial sports surfaces, including at the University of St Andrews.

Other systems use olive-derived material, thermoplastic alternatives or no loose infill.

Alternative materials have different performance, maintenance, durability, water and whole-life cost characteristics. Replacing crumb rubber with another polymeric infill would also not remove the problem of

intentionally added plastic.

Organic infill avoids the deliberate placement of tyre-derived microplastic, while the synthetic carpet remains.

## Existing rubber pitches can be contained

Replacing Scotland's artificial-pitch estate immediately would create a large waste stream and impose substantial capital costs.

Containment systems are already available for existing facilities.

European technical guidance includes solid perimeter barriers, entrance grates, boot-cleaning systems, controlled maintenance equipment, drainage filters, silt traps, designated snow-storage areas and procedures for recovering displaced infill.

Changing-room collection systems and filters can also reduce the quantity carried away in footwear and clothing.

Norway introduced national controls for pitches using loose plastic infill in 2021. The regulations require physical barriers, systems capable of capturing granules in drainage and surface water, measures to prevent users and machinery carrying material away, controlled handling of snow and arrangements for collected infill.

Norwegian authorities estimated that full implementation could reduce releases substantially, although subsequent inspections found that compliance at some facilities remained incomplete.

The 2025 UK modelling also found that containment of synthetic sports surfaces could materially reduce intentionally added microplastic emissions and environmental exposure.

## Public procurement can operate before a national ban

Scottish public authorities do not need a UK REACH prohibition before environmental impacts can be included in purchasing decisions.

The Procurement Reform (Scotland) Act 2014 places a Sustainable Procurement Duty on contracting authorities carrying out regulated procurement.

Authorities must consider how procurement can improve economic, social and environmental wellbeing.

Scottish Government procurement guidance also provides for life-cycle assessment, including raw materials, manufacturing, use, waste and final disposal.

A public funding specification for a sports pitch could therefore include requirements relating to infill material, loss containment, drainage treatment, annual top-up, fibre shedding, maintenance and end-of-life disposal.

No national Scottish procurement rule currently prohibits public money from purchasing artificial sports surfaces that use loose polymeric infill.

## Scotland can map its pitches, but not yet their pollution pathways

Scotland does have national pitch and sports-facility data.

Sportscotland provides a national Sports Facilities dataset through Spatial Hub Scotland. The dataset includes pitches and records attributes including pitch size, sport and type. It can be downloaded in CSV, GeoJSON, shapefile and web-service formats and is intended to provide a national picture of sports facilities across Scotland.

[Search and download Sportscotland's national Sports Facilities dataset](#)

The dataset is supplied by Sportscotland and published through the Improvement Service's Spatial Hub. It was last updated in July 2024 on the version currently published. The site cautions that some information comes from third parties and cannot be guaranteed to be completely accurate, although it describes the data as the most up-to-date information held.

There is also a public-facing searchable map built from the Sportscotland dataset. ScotSport allows users to search Scottish sporting facilities by council area and town, view locations on a map and filter the underlying records by facility type and address.

[Search Scotland's sports facilities on the ScotSport map](#)

Another searchable service, TurfScout, also includes Scottish football pitches using Sportscotland and Spatial Hub Scotland data. It allows searches by town or postcode and includes filters for surface, pitch format, floodlights and other characteristics where those details are available.

[Search Scottish football pitches on TurfScout](#)

These services mean it would be inaccurate to say Scotland has no national information showing where pitches are located.

What is not contained in the published national dataset is the full environmental record needed to calculate microplastic loss from every artificial surface.

A national pollution inventory would require additional information for each synthetic pitch: whether it is 2G, 3G or another construction; the exact infill material; the quantity originally installed; annual quantities of replacement infill; whether perimeter barriers and boot-cleaning systems are fitted; whether drains contain microplastic traps; where surface water ultimately discharges; the age of the carpet; expected replacement date; and how the surface and residual infill will be treated when the pitch is removed.

Those details are held, where they exist, across councils, schools, leisure trusts, football clubs, universities, contractors and other individual operators rather than being assembled into one published Scottish environmental register.

The distinction becomes important when assessing risk. Two pitches recorded simply as artificial football surfaces may have entirely different environmental pathways. One may use biodegradable infill and drain into a contained wastewater system. Another may contain tyre-derived rubber and discharge surface water towards a nearby burn.

Scotland can therefore locate many of its pitches already. What it cannot currently do from one national public dataset is show which of them contain loose tyre-derived microplastic, how much each loses, and where that material can travel after leaving the playing surface.

## **The national loss estimate has not been tested pitch by pitch**

Environmental Standards Scotland has already identified the weakness in the evidence.

The 443-to-1,772-tonne estimate is not based on directly measuring every Scottish facility.

Scottish empirical evidence is limited.

Direct monitoring could measure granules and synthetic fibres in pitch drainage, surrounding soils, storm drains, sediments and receiving waters. Chemical monitoring could include 6PPD, 6PPD-quinone, zinc and other tyre-derived substances.

Air sampling could measure particles around heavily used school and community pitches.

Measurements from new and older pitches could also establish whether age, surface construction, maintenance and containment alter emissions.

No national Scottish programme currently publishes those measurements across the pitch estate.

## **The pitch remains a waste problem after play ends**

Artificial surfaces have finite working lives.

Scottish climate research uses approximately ten years as a typical replacement interval, although individual pitches can last longer.

Replacement produces a mixture of synthetic carpet, backing material, shock pads, sand and remaining infill.

Scotland's 2020 artificial-grass research identified end-of-life management as another potential source of microplastic loss, including concerns around old turf being stored outdoors.

Residual infill can continue leaving a surface after the pitch has stopped being used for sport if rolls are stored, transported or processed without adequate containment.

Public procurement contracts can specify removal, transport, separation, recycling, reuse and final disposal. Scotland does not currently operate a single public national record following every artificial surface from installation to final treatment.

## **The position in Scotland in 2026**

Environmental Standards Scotland records artificial-turf infill as a source of microplastic pollution and cites an estimated annual Scottish loss of between 443 and 1,772 tonnes.

The Scottish Government has possessed research identifying leakage and end-of-life problems since 2020.

The EU adopted its microplastics restriction in 2023 and will end sales of qualifying granular infill from October 2031.

The Scottish Government told Parliament in 2024 that forthcoming Defra research would help shape regulation.

That UK research was published in 2025 and identified synthetic sports surfaces as the largest source of intentionally added microplastic emissions among the sectors examined.

A peer-reviewed analysis published in 2026 reached the same conclusion and modelled reductions available through restriction and containment.

The current UK REACH work programme contains no new restriction workstream covering the material.

The Scottish FA plans up to 40 additional 3G pitches by 2030 and upgrades to as many as 50 existing surfaces.

Sportscotland continues to fund artificial sports infrastructure.

Scotland has artificial pitches using alternative biodegradable infill, including the full-size surface at Clickimin in Shetland.

Natural turf remains in use and can be improved through drainage and management where site capacity allows it.

Containment systems are available for existing rubber-filled surfaces.

There is no Scottish phase-out date for loose microplastic infill, no complete published national register of pitch infill and drainage systems, and no national field-monitoring programme measuring the quantity of synthetic material leaving each site.

## Sources

Environmental Standards Scotland, Marine Litter — An Assessment of Sources, Controls and Progress in Scottish Seas, 2024. Environmental Standards Scotland

Scottish Government, Mapping Economic, Behavioural and Social Factors within the Marine Plastic Value Chain in Scotland: Artificial Grass Pitch, 2020. Scottish Government report

Economics for the Environment Consultancy and UK Centre for Ecology & Hydrology, Options to Reduce Intentionally Added Microplastics Emissions, commissioned by Defra, 2025. eFTEC research

Integrated Environmental Assessment and Management, Beyond Source Restrictions: Combined Mitigation Strategies Substantially Reduce Emissions and Exposure of Intentionally Added Microplastics in the United Kingdom, June 2026. Oxford Academic

European Chemicals Agency, Granules and Mulches on Sports Pitches and Playgrounds, current guidance on the EU restriction on intentionally added microplastics. European Chemicals Agency

Scottish Parliament, Artificial Pitches (Infill), First Minister's Questions, 28 March 2024. Scottish Parliament Official Report

UK Government, Scottish Government and Welsh Government, Rationale for Prioritising Substances in the UK REACH Work Programme: 2025 to 2026, 31 July 2025. UK REACH work programme

Scottish FA, Pitching In — Frequently Asked Questions, current programme information. Scottish FA

Sportscotland, Scottish Sport Facilities to Benefit from £5m of Additional Funding, 11 September 2026. Sportscotland

Shetland Islands Council, New 3G Synthetic Pitch Construction to Get Underway, current project information. Shetland Islands Council

ClimateXChange, A Scoping Study of the Impact of Climate Change on Grassroots Sport in Scotland, 12 June 2026. ClimateXChange

Sportscotland, Natural Turf Datasheet, technical guidance. Sportscotland technical guidance

Scottish Government, Sustainable Procurement Duty, current public-sector procurement guidance. Scottish

Government procurement guidance

Scottish Government, Scotland's Climate Change Plan 2026–2040, 24 March 2026. Scottish Government Climate Change Plan

U.S. Environmental Protection Agency and CDC/ATSDR, Synthetic Turf Field Recycled Tire Crumb Rubber Research — Exposure Characterization, April 2024. US EPA

Karatela, S. et al., Rubber Crumb Infill in Synthetic Turf and Health Outcomes: A Review of the Literature on Polycyclic Aromatic Hydrocarbons and Metalloids, *Epidemiologia*, 2025. PubMed

Fu, N. et al., Airborne Microplastic Emissions from Synthetic Sports Surfaces and Associated Health Risks to Children, *Environmental Geochemistry and Health*, February 2026. PubMed

Singh, G., Peterson, B., Jay, O. and Stevens, C.J., The Effect of Synthetic Grass Sports Surfaces on the Thermal Environment: A Systematic Review, *International Journal of Biometeorology*, July 2024. PubMed

Recycled Tire Rubber Materials in the Spotlight: Determination of Hazardous and Lethal Substances, *Science of the Total Environment*, 15 June 2024. ScienceDirect

Moloney, K.J., Rodgers, T.F.M. and Scholes, R.C., Artificial Turf Fields Act as Recurring Point Sources of Metals and Emerging Tire-Derived Contaminants in Stormwater, *Environmental Science: Processes & Impacts*, 12 March 2026. Royal Society of Chemistry

Emerging Health Risks of Crumb Rubber: Inhalation of Environmentally Persistent Free Radicals via Saliva During Artificial Turf Activities, 2023. PubMed

POLICY AND GOVERNMENT | 27 September 2026

# Your NHS Records, Tissue and DNA: When Scotland Can Share Them, and How Companies Can Profit From Their Use

Read online: <https://modern.scot/your-nhs-records-tissue-and-dna-when-scotland-can-share-the-m-and-how-companies-can-profit-from-their-use/>



Scotland is building a health research system in which information produced during ordinary NHS care, such as hospital records, prescriptions, laboratory results and, increasingly, genomic information, can be linked and analysed for research. Private companies are being given clearer routes into that system, and in 2026 the Scottish Government began subsidising some of the costs for Scottish life-sciences businesses seeking to use public-sector data.

For most people, however, there is a more basic question underneath the language of research infrastructure, innovation and public benefit.

Can information about a person in Scotland be used for medical research when that person has never agreed to take part in the research?

Under defined circumstances, the answer is yes.

That does not mean researchers can freely obtain somebody's named medical file, or that pharmaceutical companies are being handed identifiable copies of Scottish citizens' DNA. Scotland has extensive legal, ethical and technical controls around health research, including Research Ethics Committees, NHS data controllers, Caldicott Guardians, the Public Benefit and Privacy Panel and secure environments known as Safe Havens.

But individual consent is not required for every form of secondary research using NHS information. Under more restricted circumstances, research can also use surplus diagnostic tissue from living patients without fresh individual consent. Even DNA analysis has a statutory research exception where strict conditions are met.

At the same time, Scotland possesses an extraordinary biological archive accumulated over generations: newborn heel-prick blood samples retained from babies born since 1965. Around three million cards are estimated to exist. Most of the older collection was retained before families were routinely told that the blood would be stored.

The separate pieces have existed for years. What is changing is the infrastructure connecting them.

Scotland's first Human Genomic Medicine Strategy proposes national systems capable of storing, analysing and linking genomic information across NHS Scotland. The strategy envisages genomic information becoming part of national datasets, capable of linkage with wider health records and accessible for approved research through Research Data Scotland and Scotland's Safe Haven network.

Research and innovation are not peripheral to the plan. They are being designed into it.

## The NHS record that can become research data

Every encounter with NHS Scotland creates information.

A hospital admission may produce diagnosis and procedure codes. A blood test generates laboratory results. Prescriptions create prescribing records. Cancer diagnoses, maternity information, imaging, emergency attendances and deaths can become part of national or regional datasets.

These records were created primarily because somebody needed healthcare. They were not normally created because the patient had volunteered for a research project.

Scotland has nevertheless had a formal system for conducting research using such information for more than a decade.

The Scottish Government's original 2015 Safe Haven charter was unusually explicit about its purpose. Its title referred to the handling of "unconsented data" from NHS patient records, and it described circumstances in which electronic health records could be processed, linked and analysed for research when obtaining individual patient consent was not practicable.

The system is designed so that researchers do not simply receive identifiable NHS records. Approved datasets are prepared inside controlled environments. Identifiers can be removed or replaced, access is restricted, projects are independently scrutinised and outputs are checked before they leave.

A revised Safe Haven charter published in 2025 retained the central model: personal health and social-care information can be accessed and processed within Trusted Research Environments under legal, ethical and security controls.

This is not an obscure theoretical power. It is already used.

A large Scottish liver-disease research project called SteatoSITE obtained clinical information through three regional Safe Havens covering 12 of Scotland's 14 territorial health boards. The published study describes the information explicitly as "unconsented clinical data".

The records included demographic information, diagnoses, procedures, routine blood results, prescribing information, cancer registrations and death records.

The researchers did not simply request names and hospital files. The project had approval through NHS Scotland's Public Benefit and Privacy Panel and other governance routes, while linkage was carried out independently of the main research team.

The people represented in the dataset were not individually contacted and asked whether they wanted their medical histories included in SteatoSITE.

Research without individual consent is not the same thing as research without permission.

Permission can instead come through the legal and institutional system governing the data.

## Why consent is not always required

The Scottish Government's own Health and Social Care Data Strategy makes the position clear. It states that consent for the use of health and care information "will not always be required".

The reason is that consent is not the only lawful basis under which personal information can be processed.

Health information receives particularly strong protection under data-protection law, but scientific research can still proceed under other legal conditions when the necessary safeguards and public-interest requirements are met.

This produces an important difference between two questions that are easily confused.

The first is whether somebody has consented to participate actively in a research study.

The second is whether consent is the legal basis allowing an organisation to process information about that person.

Those are not always the same.

A person asked to attend a research clinic, provide a new blood sample or participate in an experimental treatment will ordinarily encounter a direct consent process.

A person whose existing hospital history becomes one record among hundreds of thousands in an approved population study may never be contacted.

Scotland's research infrastructure has been built partly because obtaining fresh consent from every person represented in decades of historical NHS data would make many population-level studies impossible.

The ethical substitute is intended to be governance: data minimisation, de-identification, independent scrutiny, secure access and a demonstrable research purpose.

Whether citizens regard that as equivalent to being asked is a different question.

## **Tissue removed during ordinary NHS care**

The position becomes more unusual when the subject moves from digital information to material taken from the human body.

Hospitals hold enormous pathology archives. Tissue removed during biopsies, operations and other procedures can be retained because it is necessary for diagnosis and clinical records.

Some of that material eventually becomes surplus to diagnostic requirements.

NHS Research Scotland operates a national Biorepository Network covering human biological materials used in research. Its public information says that, alongside tissue provided by consenting research participants, the network can support researchers seeking access to "unconsented diagnostic surplus" held in NHS pathology and blood-science archives.

Commercial as well as non-commercial researchers can use the network.

Scotland's law differs from the rest of the UK in an important respect.

The Human Tissue (Scotland) Act 2006 principally regulates tissue from deceased people. It does not establish the same statutory research framework for tissue from living people as the Human Tissue Act 2004 does in England, Wales and Northern Ireland.

Current Health Research Authority guidance states that research using tissue from living people in Scotland is governed instead through common law, NHS Research Scotland's accreditation arrangements and other legislation.

For identifiable tissue from a living person, informed consent is legally required. Consent is also required where material has been anonymised but the project has not received Research Ethics Committee approval.

The consequence is significant: anonymised tissue from a living person can, in an appropriately approved research project, be used without obtaining fresh individual consent.

That is how material taken originally for clinical reasons can acquire a second life as research material.

The SteatoSITE project demonstrates the mechanism. It used archived liver tissue obtained through NHS Scotland's biorepository infrastructure alongside linked NHS information.

The study participants had not all separately volunteered for that research project.

## **DNA has another set of rules**

DNA is treated differently again.

Section 45 of the Human Tissue Act 2004 creates a UK-wide criminal offence connected with analysing DNA from bodily material without "qualifying consent". Unlike most of that Act's research provisions, Section 45 applies in Scotland.

It sounds absolute. It is not.

Schedule 4 creates excepted purposes.

The Human Tissue Authority's current research guidance says DNA analysis can be undertaken without consent for research concerning disorders or the functioning of the human body when three conditions are satisfied: the material came from a living person; the researcher does not possess and is not likely to obtain information identifying that person; and the specific research project has approval from a recognised Research Ethics Committee.

The Authority gives the example of DNA being extracted from tissue biopsies belonging to living people. If the researcher cannot identify the patients and the project has recognised ethical approval, the absence of individual consent does not create the Section 45 offence.

The Human Tissue Authority nevertheless recommends obtaining consent where it is practical.

This is a narrow legal route, not a general permission to analyse anybody's DNA.

But it means that the apparently straightforward statement that "nobody in Scotland can have their DNA researched without consent" is not correct.

Under certain tightly controlled circumstances, they can.

## **Three million blood spots**

Scotland possesses another resource unlike almost anything else in its health system.

Since 1965, newborn babies have routinely undergone heel-prick blood testing for serious medical conditions. Drops of blood are placed on cards, tested and retained.

The archive is estimated to contain around three million cards.

For people born in Scotland across much of the second half of the twentieth century, a few drops of blood

taken days after birth may therefore still exist.

The consent history is striking.

A Scottish Government review published in 2014 found that from 1965 until 2003, inclusion in the collection operated on "presumed" consent and parents were not told that the cards would be retained.

The report concluded that the majority of the collection was consequently being held without informed consent from the people concerned or, when they were children, their parents.

Modern practice is different.

NHS Inform now tells parents that leftover newborn blood samples must be stored for at least 12 months. Unless parents object, samples may be kept longer and used, with identifying details removed, for research, education and training.

Parents can tell their midwife that they do not want the card stored after the minimum period or used for research.

If NHS Scotland wants to use a sample in a way that is not anonymous, it says consent will be sought.

The historical archive presents a more difficult question because the overwhelming majority of older adults represented within it never made such a choice.

## Researchers have already proved what the archive can do

Scotland's newborn cards are not simply old pieces of paper.

Researchers have established that usable DNA can be recovered from them decades after collection.

A Scottish feasibility study published in 2022 examined whether the archive could support population research. The archive was described as approximately 900 boxes containing roughly three million cards.

Researchers found that sufficient information existed on most of the older cards to make linkage with NHS records technically possible.

They also showed that DNA could be recovered from blood spots stored for decades. In tests across cards dating from 1965 onwards, DNA of sufficient quality for sequencing was successfully recovered from most of those sampled.

The study went considerably further.

Researchers demonstrated that archived newborn DNA could reveal biological signals associated with exposures around birth, including epigenetic signatures corresponding with maternal smoking.

The possibility is remarkable: a sample collected shortly after someone's birth could potentially be linked to decades of subsequent NHS history, allowing researchers to study relationships between very early biological conditions and diseases appearing much later in life.

The researchers described the archive as having the potential to create a population-level retrospective birth cohort extending back to 1965.

But there is an important limit.

The broader historical archive has been subject to a moratorium on general research access. The feasibility work that involved identifiable linkage used Generation Scotland volunteers who had consented to research.

Modern Scot found no subsequent Scottish Government publication announcing that the historical three-million-card archive has been opened to unrestricted general research.

The difference must not be blurred.

Scotland possesses the resource.

Researchers have demonstrated what it can do.

That does not mean millions of historical blood spots are currently being freely sequenced.

## **Some people have explicitly volunteered**

There is another side to Scotland's genomic research system that is straightforwardly consent-based.

The Scottish Health Research Register and Biobank, known as SHARE, allows adults to volunteer for research. Its ethics renewal in 2025 recorded a biobank containing material from around 243,000 consented surplus blood samples, including extracted genetic material.

Participants can authorise surplus blood remaining after routine NHS tests to be retained rather than discarded.

That material can then support approved research ranging from individual genetic variants to whole-genome analysis.

Generation Scotland operates on a similar volunteer basis.

Its biorepository currently records DNA from more than 35,000 participants. The cohort contains genotype, methylation, proteomic and other biological information, together with extensive health-record linkage.

Researchers can apply for access, including commercial companies. Commercial applications require contracts and undergo financial and reputational checks.

Participants therefore knowingly entered Generation Scotland.

They should not be grouped with patients whose routine NHS records enter secondary research without project-specific consent.

Scotland currently operates both models at once.

## **The commercial route is becoming clearer**

The newest development is private-sector access.

In March 2026, Research Data Scotland published a new Operational Framework intended to make it easier and more consistent for companies to seek access to Scotland's public-sector data for research.

The framework is expressly concerned with industry access to de-identified public-sector personal data.

Its starting condition is public benefit. Companies are expected to explain what benefit their proposed use will produce, what commercial interests are involved and how those interests are balanced against value to

the public.

They are also expected to pay the costs associated with preparing and providing safe access to data.

The framework does not envisage handing companies a spreadsheet containing citizens' medical records.

Individual-level research data is prepared inside a secure environment. Researchers work inside that environment, and the framework says row-level data cannot be removed.

Only approved outputs leave.

The economic purpose is nevertheless explicit.

The Scottish Government's wider Unlocking the Value of Data programme was established because public bodies were receiving private-sector requests for access to personal data and lacked a consistent approach for deciding what should be allowed.

Its independent expert group concluded that private-sector use could produce public benefit but said economic value generated from Scottish public data should also be shared with the people of Scotland.

It proposed red lines against uses such as insurance, credit rating and marketing, and against projects whose purpose is overwhelmingly commercial rather than public.

The 2026 framework currently relies mainly on cost recovery while leaving the possibility of more developed benefit-sharing arrangements as commercial value emerges.

## **Government is now helping companies pay for access**

In July 2026, Research Data Scotland opened another door.

Scottish life-sciences SMEs can apply for Private Sector Accelerator Awards providing up to £60,000 per project in waived data-preparation and analysis costs.

The money does not buy a company a copy of a citizen database. It pays organisations involved in preparing, curating, managing and linking the datasets required for an approved project.

A maximum of three projects is being funded under the scheme.

The stated purpose is to enable Scottish companies to turn public-sector health-data assets into new products and services.

That puts the issue beyond abstract discussions about whether health data might one day have economic value.

Scotland is actively constructing an economic development programme around controlled access to it.

## **Genomic medicine changes the scale**

The most important development may still be ahead.

Scotland's first Human Genomic Medicine Strategy, published in 2024 and running to 2029, describes the country's existing genomic systems as fragmented.

There is currently no single national genomic medicine data return.

The strategy proposes changing that.

It calls for secure, scalable systems for storing and analysing large genomic datasets, including a national genomic variant repository. Genomic information is intended to be linked through Scotland's Community Health Index and made available across health-board boundaries.

The longer-term plan is for standardised genomic information to become part of a national data return under Public Health Scotland.

That information could then be connected with other national datasets and registries.

Research Data Scotland and the Scottish Safe Haven Network are explicitly identified as potential gateways through which genomic information could be used for research, development and innovation.

The strategy repeatedly refers to collaboration among NHS Scotland, universities and industry.

It states that research and innovation should be "built in and facilitated by design".

It also proposes developing consent models within genomic testing pathways that support research and innovation.

That last point will deserve close public scrutiny.

Genomic information is unlike an ordinary hospital code.

It can reveal inherited characteristics, disease susceptibility and biological relationships. It also inherently contains information about people who never supplied the sample: parents, siblings and children share portions of the same genetic inheritance.

The Scottish strategy itself recognises genomic information as identifiable information requiring particular care.

The decisions being made now about consent, linkage and future research access will therefore govern a resource substantially more sensitive than the administrative health datasets around which Scotland's Safe Havens were originally built.

## **Scotland has no equivalent of England's national opt-out**

People in England can make a national data opt-out choice covering certain secondary uses of confidential patient information for research and planning.

That system does not apply in Scotland.

NHS England's own guidance explicitly states that its national opt-out covers England and does not extend to information generated or processed in Scotland.

Scotland has had narrower mechanisms. The former SPIRE primary-care system allowed patients to flag an objection to certain identifiable GP extracts. SPIRE itself was decommissioned in 2023, although Public Health Scotland says the patient-exclusion code remains available in GP systems.

The replacement Primary Care Intelligence Service is currently focused on aggregate data, where individuals cannot be identified and therefore cannot individually be removed from an aggregate count.

But Scotland does not currently operate a single England-style national switch allowing somebody to say that

all of their NHS information should be excluded from secondary research use.

People retain data-protection and confidentiality rights and can raise objections with NHS organisations.

Those rights are important, but they are not absolute.

NHS Scotland itself tells patients that personal information can be used for scientific research and other public-interest purposes under legal bases other than consent.

## The potential dangers

The potential dangers in Scotland's emerging genomic and health-data system do not begin with somebody deliberately misusing a database. They arise from the nature of the information itself and from what becomes possible when records that were once separate can be connected.

A hospital admission on its own reveals something about a person. A prescription history reveals more. Laboratory results, imaging, cancer registrations, maternity records and decades of diagnoses reveal still more. Add genomic information and biological samples, then connect those records through Scotland's Community Health Index, and the resulting resource can describe a person with a degree of detail that would have been impossible when many of the individual records were originally created.

That is precisely what gives linked health data its scientific value. It is also what increases the consequences if the information is used for purposes people did not expect, if access controls fail, or if seemingly de-identified information can be connected back to individuals.

Genomic information presents a particular problem because anonymity becomes much harder to guarantee. Scotland's own Genomic Medicine Strategy treats genomic information as identifiable information and acknowledges that its value comes partly from linking it with other genomic and clinical datasets. A sufficiently detailed genetic profile is not comparable with an anonymous spreadsheet row. It can itself distinguish one person from another.

DNA is also permanent. A compromised password can be replaced. A genome cannot.

And genomic information does not concern only the person whose sample was tested. Biological relatives share portions of the same inheritance. A finding about one person's genome may reveal information about parents, siblings or children who never provided a sample and never entered the research project. The expansion of genomic medicine therefore creates privacy questions extending beyond the individual patient on whom a test was performed.

Scotland's strategy recognises another difficulty: it may not be possible to know at the time of testing everything that genomic information will eventually reveal. Scientific understanding changes. A sequence generated for one clinical purpose today could contain information that acquires entirely different significance years later. The Scottish Government itself acknowledges that the future implications of genomic information can be difficult to predict, complicating the idea of fully informed consent.

That problem becomes larger when information is retained for long periods. Consent given for one class of research may precede technologies that did not exist when the person agreed. Artificial intelligence can identify relationships across very large datasets that researchers working manually could never reasonably discover. New analytical techniques can therefore increase the informational value of old records without anything new being collected from the patient.

The historical newborn blood-spot archive illustrates the problem particularly clearly. Millions of Scottish

samples have survived from a period when parents were not routinely told that the cards would be retained. Scientific advances have since demonstrated that useful DNA can be recovered from cards stored for decades and potentially linked to later NHS information. The research moratorium surrounding the wider historical archive currently limits what can be done, but the scientific capability now exists in a form that could not have been explained to parents whose babies were screened in the 1960s or 1970s.

There is also the risk of what is sometimes called function creep: information collected for one legitimate purpose gradually becoming useful for others.

A genomic test might begin as part of diagnosis. Its result may subsequently contribute to a national genomic repository. The resulting information may support health-service planning, research, drug development or artificial-intelligence analysis. Each individual step may have a lawful justification and its own safeguards. The cumulative effect can nevertheless be very different from the purpose for which the citizen originally encountered the NHS.

Scotland's genomic strategy itself acknowledges that the boundary between clinical care and research is becoming less clear, particularly where research increasingly forms part of routine genomic medicine. It is therefore developing consent models intended not only to support clinical testing but also to facilitate research, development and innovation.

## **Commercial involvement introduces another set of questions.**

Companies may discover medicines, diagnostics, algorithms or other intellectual property by analysing publicly supported Scottish health resources. Scotland's emerging private-sector framework requires public benefit and controlled access, while government advisers have argued that economic value generated from public data should be shared with the public sector and the people of Scotland.

But there is not yet one simple national formula under which a citizen can see how much commercial value was generated from information ultimately derived from people like them, how much the company retained and what returned to Scotland.

This produces a potential imbalance. The individual may contribute the biological information without receiving a direct financial interest in whatever is subsequently created from it. NHS Scotland, universities and other public institutions may have spent decades generating, maintaining and linking the underlying records. A private organisation may then develop commercially valuable intellectual property using an approved research environment. Cost-recovery charges for access do not necessarily correspond to the eventual value of what is discovered.

The Scottish Government's own work on private-sector data access has recognised this issue and considered benefit-sharing mechanisms, including questions around intellectual property and financial return. That policy work exists because access to health information can create economic value far beyond the administrative cost of preparing the dataset.

## **There are risks even where no commercial organisation is involved.**

Large linked datasets increase the consequences of a security failure. Scotland's proposed genomic infrastructure is intended to make information available across organisational boundaries while supporting national analysis and research. That requires more systems, more authorised users, more technical connections and more decisions about access. Secure research environments are designed to reduce those risks, but no digital architecture can make the possibility of error, inappropriate access or cyberattack

disappear altogether.

The sensitivity of genomic information makes the potential consequences unusually long-lived. A medical-record breach may reveal a past diagnosis. A genomic-data breach could expose information relevant to health risks throughout someone's lifetime and, potentially, information relevant to relatives as well.

The increasing use of artificial intelligence introduces a different risk: conclusions may be produced from combinations of information that no human researcher explicitly sought.

Algorithms can discover correlations across genetics, diagnoses, prescriptions, geography and other characteristics. Those correlations may prove medically useful. They can also reproduce biases in the population from which the data was drawn.

Scotland's genomic strategy itself warns about health-data inequalities. Populations that are poorly represented in genomic datasets may receive less accurate predictions or fewer benefits from precision medicine. Conversely, communities that are heavily represented can become disproportionately visible to research systems.

There is also the possibility of erroneous inference. Medical records are not perfect descriptions of human beings. Coding mistakes occur. Diagnoses change. Prescriptions do not prove that medicines were taken. A laboratory result can be abnormal for temporary reasons. When millions of such entries are linked together and analysed computationally, errors can become part of the evidence from which conclusions are drawn.

Genomic predictions can present a related problem. Genetic susceptibility is not the same as certainty. A variant associated statistically with increased risk does not mean that an individual will develop the disease. As genomic information becomes more widely available across healthcare, maintaining the difference between probability and diagnosis becomes important.

Genetic discrimination is another recognised concern. Scotland's Genomic Medicine Strategy specifically identifies it as one of the possible unintended consequences associated with genomic information.

Current Scottish data-access proposals place restrictions around uses such as insurance, credit rating and marketing, and there is no evidence that Scottish genomic databases are presently being opened for those purposes. The concern is instead about the future value of information that could potentially reveal predisposition to illness, longevity or inherited conditions. The existence of safeguards today does not remove the need to decide where permanent boundaries should sit as the technology develops.

Public trust may ultimately be one of the system's most valuable protections, and one of the easiest to lose.

Research Data Scotland, NHS Scotland and the Scottish Government repeatedly emphasise public benefit, secure access and transparency. Those protections depend upon citizens believing that the institutions holding their information will use it in ways broadly consistent with what people reasonably expect.

That makes transparency more than a communications exercise.

A citizen who discovers after the event that their information could legally have been used in research without individual permission may react differently from a citizen who understood that possibility beforehand, even if exactly the same lawful safeguards operated in both cases.

The same is true of commercial research. Telling people that companies cannot simply download their NHS records is important. So is telling them that approved company researchers may nevertheless be permitted to analyse de-identified information derived from those records inside secure environments.

Scotland's system contains significant safeguards: independent ethics review, privacy assessment, Caldicott oversight, data controllers, Trusted Research Environments, disclosure checking, contractual controls and special legal protections surrounding health and genetic information.

Those controls substantially reduce risk.

They cannot resolve the underlying policy question of how much secondary use of a person's biological and medical history should be permitted without that person making an individual decision each time.

That question becomes more difficult as Scotland moves from relatively conventional health statistics towards national genomic infrastructure capable of connecting DNA, clinical histories and increasingly powerful analytical systems.

The greater the scientific value created by linking those resources, the greater the consequences of getting the boundaries wrong.

## Sources

Scottish Government, Genomic Medicine Strategy 2024 to 2029, 19 April 2024. Scottish Government genomic strategy

Scottish Government, Health and Social Care: Data Strategy, 22 February 2023. Scottish health and social care data strategy

Scottish Government, Charter for Safe Havens in Scotland: Handling Unconsented Data from NHS Patient Records to Support Research and Statistics, 16 November 2015. 2015 Safe Havens charter

Scottish Government, Safe Havens: Charter, 27 March 2025. 2025 Safe Havens charter

Research Data Scotland, Private Sector Access to Public Sector Data: Operational Framework for Research Data Access, 23 March 2026. Private-sector data access framework

Research Data Scotland, Private Sector Accelerator Awards, 2026. Private Sector Accelerator Awards

Scottish Government, Unlocking the Value of Data — Independent Expert Group: Final Report, 31 August 2023. Unlocking the Value of Data final report

NHS Research Scotland, The Biorepository Network, current guidance. NHS Research Scotland Biorepository Network

Health Research Authority, Compliance with National Legislation Regarding Human Tissue, updated 28 April 2026. HRA human tissue guidance

Human Tissue Authority, Code E: Research — Consent and DNA Analysis, current guidance. Human Tissue Authority research code

Human Tissue Act 2004, Section 45 and Schedule 4. Human Tissue Act 2004

Fallowfield et al., An Integrated Gene-to-Outcome Multimodal Database for Metabolic Dysfunction-Associated Steatotic Liver Disease, Nature Medicine, 2023. SteatoSITE study

Scottish Government, Guthrie Cards in Scotland: Ethical, Legal and Social Issues, 13 January 2014. Scottish Government Guthrie card review

Cunningham-Burley et al., Feasibility and Ethics of Using Data from the Scottish Newborn Blood Spot Archive for Research, Communications Medicine, 6 October 2022. Scottish newborn blood-spot feasibility study

NHS Inform, Blood Spot Tests in Scotland, updated 29 July 2026. NHS Inform newborn blood-spot guidance

Health Research Authority, SHARE: Scottish Health Research Register and Biobank — 2025 Renewal, favourable opinion 26 February 2025. SHARE ethics renewal

Generation Scotland, About Samples, 3 July 2025; and Access Policy, 2025. Generation Scotland samples  
Generation Scotland access policy

NHS England, National Data Opt-Out: Geographical Coverage, current guidance. National Data Opt-Out guidance

Public Health Scotland, Primary Care Intelligence Service — Information About PCIS, current guidance. Public Health Scotland PCIS information

NHS Inform, How the NHS Handles Your Personal Health Information, current guidance. NHS Scotland health-information guidance

Scottish Government, Genomic Medicine Strategy 2024 to 2029 — Ethical and Legal Frameworks, 19 April 2024. Scottish Government genomic medicine strategy

Scottish Government, Genomic Medicine Strategy 2024 to 2029 — Data and Digital Infrastructure, 19 April 2024. Scottish Government genomic data infrastructure

Scottish Government, Genomic Medicine Strategy 2024 to 2029 — Genomic Data Returns and Building a Robust Evidence Base, 19 April 2024. Scottish Government genomic data returns

Scottish Government, Genomic Medicine Strategy 2024 to 2029 — Research, Development and Innovation, 19 April 2024. Scottish Government genomic research and innovation

Scottish Government, Guthrie Cards in Scotland: Ethical, Legal and Social Issues, 13 January 2014. Scottish Government Guthrie card review

Information Commissioner's Office, What is Special Category Data?, current guidance. ICO guidance on genetic and health information

Research Data Scotland, Private Sector Access to Public Sector Data: Operational Framework for Research Data Access, March 2026. Private-sector data access framework

TRANSPORT | 1 October 2026

# Following a Global Climate Agenda: Scotland's £2 Buses to Push Travel Away From Cars

Read online: <https://modern.scot/following-a-global-climate-agenda-scotlands-2-buses-to-push-travel-away-from-cars/>



Scotland's £2 bus cap is being presented as help with the cost of living, but the Government's own documents place cheaper public transport inside a much larger programme intended to influence how people travel. That policy chain reaches beyond Scotland to the Paris climate framework and international sustainable-development goals, then runs through Scottish climate law to a transport strategy that explicitly seeks to incentivise alternatives and

disincentivise private-car use. In Strathclyde alone, bus-operator reimbursements are forecast at £53 million to £61 million during 2026–27.

The Scottish Government is prepared to spend as much as £61 million this financial year reimbursing bus operators for the £2 fare cap in Strathclyde as part of a transport policy explicitly intended to move more journeys towards public transport and reduce reliance on private cars.

That £61 million is not an estimate for the whole of Scotland. It is the upper end of the forecast for Strathclyde alone, where the scheme did not begin until 7 September.

Ministers nevertheless remain committed to introducing legislation for a permanent £2 bus fare cap across Scotland before the end of this Parliament. The full annual cost of operating that nationwide scheme has not yet been published.

The fare cap has an immediate and obvious purpose: it makes eligible bus journeys cheaper for passengers. But affordability is not the whole policy.

The Scottish Government's own climate and transport documents make clear that public money is also being used to influence travel behaviour. Scotland's Climate Change Plan says government intends to address what it calls an "overreliance on cars" by "incentivising behaviour change towards sustainable travel modes and disincentivising private car use".

The £2 ticket therefore sits inside a wider policy that is intended to alter the relative attractiveness of different forms of transport.

## The £2 fare is not the cost of the journey

The simplest way to understand the policy is to separate what the passenger pays from what the journey costs to provide.

A passenger on an eligible participating service pays no more than £2 for a qualifying single journey. The bus operator does not simply absorb the remainder of its normal fare.

Government reimburses participating operators for most of the difference.

In the Highlands and Islands pilot, reimbursement rates range from 90 to 98 per cent of the difference between the normal eligible single fare and the £2 paid by the passenger. Transport Scotland has said the rate for individual operators takes account of factors including existing ticket arrangements and the potential for additional passengers to be generated by the lower fare.

In Strathclyde, the standard reimbursement is 90 per cent of the difference between £2 and the operator's normal single fare, subject to validation and provisions covering exceptional circumstances.

If an ordinary single fare were £10, for example, the passenger would pay £2. At a 90 per cent reimbursement rate, government would pay £7.20 of the remaining £8 difference. The operator would therefore receive £9.20 rather than £10.

The economic model depends partly on lower fares generating additional passengers and additional journeys.

That is important because passenger growth is not merely an accidental consequence of the subsidy. Increasing public-transport use is one of the policy objectives.

## **Almost £9.5 million claimed in the Highlands and Islands**

The Highlands and Islands pilot now provides an indication of how quickly the public cost can accumulate.

By 8 September, participating operators had submitted reimbursement claims totalling £9,477,806.74 for 1,509,749 journeys made under the £2 scheme.

Those are claims submitted by operators, rather than necessarily the final amount ultimately paid after validation. Taken together, however, the figures equate to approximately £6.28 in reimbursement claimed for every capped journey recorded.

That amount is in addition to the maximum £2 paid by the passenger.

Transport Scotland separately says passengers using the Highlands and Islands scheme have been saving more than £6 per journey on average.

The original Highlands and Islands pilot was supported by £10 million. Transport Scotland warned when it began that funding was limited and that the duration of the programme could change according to passenger demand.

By early September, operator claims received were already approaching the size of that original £10 million allocation.

The policy was nevertheless not confined to the pilot area. It was extended into Strathclyde.

## **Up to £61 million in Strathclyde**

The Scottish Government now estimates that reimbursements to operators participating in the Strathclyde £2 fare scheme will cost between £53 million and £61 million during 2026–27.

The scale becomes clearer when placed beside Scotland's existing bus budget.

The 2026–27 Scottish Budget provides £528.3 million for concessionary fares and bus services.

Within that total, £472.8 million is allocated to concessionary fares, £50.5 million to support for bus services and £5 million to the smartcard programme.

A £61 million Strathclyde fare-cap reimbursement bill would therefore be equivalent to about 11.5 per cent of the size of Scotland's entire £528.3 million concessionary-fares-and-bus-services budget.

It would also be larger than the £50.5 million budget line identified as Support for Bus Services.

Those comparisons do not mean the £61 million is necessarily being paid entirely from those particular budget lines. They show the scale of the commitment compared with the money already allocated to Scotland's bus system.

The wider Transport budget is much larger because it must also pay for railways, ferries, trunk roads, aviation, active travel and other infrastructure.

But expenditure still carries an opportunity cost. Public money used to reimburse lower passenger fares cannot simultaneously be spent on another service unless the overall budget or government revenue increases.

Despite the size of the Strathclyde estimate, the Scottish Government has not yet published the equivalent annual figure for operating a permanent £2 fare throughout Scotland.

## **The Government explicitly wants behaviour to change**

The significance of the expenditure cannot be understood simply by looking at household savings.

The Government wants lower fares to affect transport choices.

Transport Scotland describes the Highlands and Islands programme as providing evidence on passenger demand and modal shift. The expansion into Strathclyde is intended to provide further evidence from Scotland's largest urban transport market before a nationwide system is designed.

"Modal shift" means people moving journeys from one form of transport to another.

The wider Scottish climate policy is more explicit about the objective.

Scotland's Climate Change Plan states: "To address our overreliance on cars, we will create the enabling environment for reducing car use, incentivising behaviour change towards sustainable travel modes and disincentivising private car use, where these align with a just transition."

That is not an interpretation being placed on the policy from outside government. It is the Scottish Government's stated transport outcome.

The plan says achieving reductions in car use requires behaviour change and identifies switching journeys to walking, wheeling, cycling and public transport as one of the behaviours it wants to encourage.

The £2 fare cap sits directly on the incentive side of that approach.

Public money lowers the price presented to the passenger. Government then compensates operators for most of the fare that the passenger no longer pays.

The purpose is not only to make journeys cheaper for people who already use buses. It is also to make the bus sufficiently attractive that some people change how they travel.

## Cheaper buses are only one side of the policy

The other side of Scotland's transport policy is the stated intention to reduce the attractiveness or prevalence of private-car use where ministers consider alternatives practical.

The Climate Change Plan does not rely solely on replacing petrol and diesel vehicles with electric cars.

It also seeks an overall reduction in car use.

The Government says its target is to reduce emissions from cars by at least 16 per cent between 2023 and the first carbon-budget period ending in 2030. Its policy combines increased electric-vehicle uptake with a reduction in annual car mileage compared with the level expected without further intervention.

Government documents discuss both incentives and disincentives.

Investment in buses, railways, walking and cycling sits on the incentive side. Potential parking measures and local road-user charging powers appear among the mechanisms considered for managing demand for private-car travel.

The Scottish Government and COSLA say reducing car dependency will require an “enabling environment” in which alternatives become practical enough for people to change their behaviour.

The result is a policy operating from both directions: substantial public spending is used to make alternatives such as buses cheaper and more attractive, while the wider transport programme explicitly seeks to reduce private-car use.

## The policy framework did not begin entirely within Scotland

The transport programme also sits inside a climate-policy framework whose origins extend beyond Scotland.

The Paris Agreement was negotiated internationally under the United Nations climate system in 2015. The United Kingdom ratified it in 2016. Scotland is not independently a treaty party because international treaties are a reserved matter for the UK.

The Scottish Government nevertheless chose to align Scotland's domestic climate policy closely with the international framework.

In its own indicative contribution to the Paris Agreement, the Scottish Government stated that Scotland's emissions target had been set “in direct response to the aims of the Paris Agreement”. It described Scotland as seeking to raise global climate ambition and published its own indicative contribution to the international process.

Scotland's policy framework also refers to the United Nations Sustainable Development Goals. Those global goals include an objective of improving access to safe, affordable and sustainable transport and expanding public transport.

Neither the Paris Agreement nor the UN Sustainable Development Goals instructed Scotland to introduce a £2 bus fare.

They did not determine how much Scottish motorists should drive, what parking should cost, whether Scottish councils should introduce road charging or which forms of transport should receive public subsidy.

Those choices were subsequently made through Scottish politics, legislation and government policy.

But the wider direction did not originate solely in Scotland.

The traceable sequence runs from an international climate framework, through Scottish emissions commitments, into Scottish transport policy and finally into measures intended to change everyday travel behaviour.

## **From international objectives to domestic transport policy**

That distinction is important.

It would be inaccurate to say that an international organisation ordered the Scottish Government to spend up to £61 million subsidising Strathclyde bus fares. There is no such requirement.

It would also be incomplete to present the £2 bus cap as an isolated Scottish cost-of-living initiative without explaining the larger policy structure into which it has been placed.

The Scottish Government itself links Scotland's climate targets to the Paris framework. Its Climate Change Plan then links those domestic targets to reducing car use, encouraging modal shift and changing travel behaviour.

The £2 bus fare is one of the mechanisms now being used within that domestic programme.

The international framework establishes the broad emissions objective. Scottish governments and the Scottish Parliament decide how Scotland pursues it.

In transport, one of those choices has been to spend public money lowering the immediate price of bus travel while pursuing a wider strategy explicitly intended to reduce private-car dependency.

## **Scots did not directly vote on the Paris Agreement**

There was no referendum in Scotland asking voters whether the country should adopt the Paris Agreement or the United Nations 2030 Agenda.

The United Kingdom ratified the Paris Agreement through the treaty and parliamentary process rather than through a public vote.

But the resulting Scottish climate policy did pass through Scotland's elected institutions.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, which established Scotland's 2045 net-zero target and strengthened its statutory emissions framework following Paris, was passed by the Scottish Parliament.

MSPs subsequently approved further climate legislation in 2024 replacing annual emissions targets with a system of carbon budgets.

The democratic position is therefore more complicated than saying either that Scots voted directly for the international framework or that its domestic consequences were simply imposed on Scotland without decisions being taken here.

The international goals were not directly put to Scottish voters. Scottish politicians subsequently chose the domestic legal targets and policy measures intended to contribute towards them.

## **A global objective reaches the price of a local bus journey**

The policy chain can now be followed from international climate commitments to something as ordinary as the fare charged when someone boards a bus.

International agreements established a global framework for reducing emissions.

Scotland chose ambitious domestic emissions targets within that framework.

Scottish climate law requires government to develop policies intended to achieve those reductions.

Transport is one of Scotland's largest sources of greenhouse-gas emissions, so travel choices form part of that programme.

The Government consequently wants more journeys to be made using public and active transport and fewer journeys to rely on private cars.

The £2 bus fare cap is one method of influencing that choice.

The passenger sees a £2 ticket.

Behind it is a potentially much larger public payment made so that the commercial fare does not have to be paid by the passenger.

In Strathclyde, the Government believes those reimbursements could reach £61 million in the current financial year.

## **The subsidy is not restricted to Scottish residents**

The fare cap is also not a benefit reserved for Scottish residents or Scottish taxpayers.

Transport Scotland states that there is no residency requirement.

A visitor using an eligible participating service receives the same capped fare as someone who lives in Scotland.

That differs from Scotland's concessionary travel schemes, where eligibility is generally linked to residence and qualifying circumstances.

The £2 cap is instead an intervention in the price of eligible bus travel itself.

If an eligible journey ordinarily costs substantially more than £2, the passenger receives the capped price regardless of whether they live in Glasgow, elsewhere in Scotland or outside Scotland altogether.

## **What happens if the policy succeeds?**

Government identifies several potential benefits from changing travel behaviour, including lower household transport costs, lower emissions, reduced congestion, improved air quality and better access to employment and services for people without cars.

But successful behavioural change also creates a longer-term responsibility.

If households are encouraged to organise employment, education, healthcare, shopping and other journeys around public transport rather than private cars, the reliability and long-term affordability of those

networks become increasingly important.

Bus services must remain frequent enough to support the travel patterns government is encouraging.

Operators must continue to regard participation as commercially viable.

Government must remain capable of financing the subsidy on which the low fare depends.

And if private-car provision is simultaneously reduced or made less attractive through other policies, reversing a change in travel habits may become more difficult.

Those questions become more important as Scotland moves from a regional pilot towards a permanent nationwide scheme.

## **Scotland knows the intended fare but not yet the national bill**

The Scottish Government can point to substantial savings for passengers.

It can point to more than one million journeys already made under the Highlands and Islands fare cap.

It can argue that cheaper public transport improves access to work, education and services while contributing to its climate objectives.

The emerging financial figures show the other side of that choice.

By 8 September, operators in the Highlands and Islands had submitted almost £9.48 million in reimbursement claims.

In Strathclyde alone, reimbursement is forecast to cost between £53 million and £61 million during 2026–27.

Scotland already budgets £528.3 million for concessionary fares and bus services.

Government policy explicitly seeks to influence travel behaviour, increase the use of public transport and reduce private-car use.

And ministers intend to legislate for a permanent £2 cap across the country.

What has not yet been published is the figure required to judge the complete financial commitment: the annual cost of maintaining that fare throughout Scotland once the system is fully operational.

The wider climate objectives reach Scotland from an international framework developed outwith the country. Scotland's elected institutions subsequently adopted their own emissions targets and chose the domestic policies used to pursue them.

The £2 bus fare is now one of those choices.

As the policy moves towards nationwide implementation, the question is no longer only whether £2 is an attractive fare.

It is how much public money Scotland is prepared to spend each year to influence how its population travels — and what other transport choices will change around it.

## **Sources**

£2 Bus Fare Cap — Transport Scotland, current scheme guidance and national expansion information.  
<https://www.transport.gov.scot/public-transport/buses/2-bus-fare-cap/>

Questions S7W-03204 and S7W-03205 — Scottish Parliament, answered 28 September 2026.  
<https://www.parliament.scot/chamber-and-committees/questions-and-answers>

Transport Scotland — Bus fare cap pilot evaluation and reimbursement data: FOI release — Scottish Government, 11 August 2026. <https://www.gov.scot/publications/foi-202600517785/>

Scotland's Climate Change Plan 2026–2040: Sectoral Annexes — Scottish Government, 2026.  
<https://www.gov.scot/publications/scotlands-climate-change-plan-2026-2040-annexes/pages/14/>

Scotland's Climate Change Plan 2026–2040: Fairer Scotland Duty Assessment — Scottish Government, 2026.  
<https://www.gov.scot/publications/scotlands-climate-change-plan-2026-2040-fsda/pages/5/>

Scottish Budget 2026 to 2027: Chapter 8 — Transport — Scottish Government, 6 March 2026.  
<https://www.gov.scot/publications/scottish-budget-2026-2027/pages/10/>

Scottish Budget 2026 to 2027: Climate Change Taxonomy — Scottish Government, 2026.  
<https://www.gov.scot/publications/scottish-budget-2026-2027-climate-change-taxonomy/pages/2/>

Scotland's contribution to the Paris Agreement: indicative Nationally Determined Contribution — Scottish Government, 23 July 2021.  
<https://www.gov.scot/publications/scotlands-contribution-paris-agreement-indicative-ndc/>

Transforming our world: the 2030 Agenda for Sustainable Development — United Nations, 2015.  
<https://sdgs.un.org/2030agenda>

UK ratifies the Paris Agreement — UK Government, 18 November 2016.  
<https://www.gov.uk/government/news/uk-ratifies-the-paris-agreement>

Climate Change (Emissions Reduction Targets) (Scotland) Bill — Scottish Parliament, passed 25 September 2019.  
<https://www.parliament.scot/bills-and-laws/bills/s5/climate-change-emissions-reduction-target-scotland-bill>

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ENVIRONMENT | 27 September 2026

# Scotland Knows the Pesticides It Uses, But Less About Where They Go

Read online: <https://modern.scot/scotland-knows-the-pesticides-it-uses-but-less-about-where-they-go/>



Almost every hectare of Scotland's arable farmland received a pesticide treatment in 2024.

The country's arable crops covered about 502,400 hectares. Once repeat treatments through the growing season were counted, from herbicides, fungicides, insecticides, growth regulators, seed treatments and others, pesticide applications amounted to just over five million treated hectares. Around 1,300 tonnes were applied.

Scotland can therefore estimate with considerable precision which substances farmers use, on which crops, in what quantities and how often. Ware potatoes receiving pesticide treatment averaged 13.5 applications. Seed potatoes averaged 10.7. Herbicides or desiccants reached 97 per cent of arable land; fungicides also reached 97 per cent.

The precision begins to diminish once the chemical has left the sprayer.

Scotland does not have an equivalent national census showing how much pesticide residue remains in agricultural soil. Its principal national air-quality network does not routinely measure pesticides. The latest comprehensive national survey showing what councils spray onto streets, paths, parks and other public ground records use in 2019.

Water is different.

There, Scotland has repeatedly found evidence of pesticides making the journey beyond the place where they were intended to work.

That journey — from field, pavement, pet or garden into soil, drain, burn, river and eventually a treatment works — reveals a much larger pesticide system than the familiar image of a tractor moving through a crop. It also exposes an unusual imbalance in Scotland's environmental knowledge. The country knows a great deal about what is applied. It knows considerably less about what remains afterwards.

## Five million treated hectares

The five-million-hectare figure does not mean Scotland somehow sprayed an area ten times larger than its arable land. It records repeated treatments.

A cereal field might receive a herbicide early in the season, followed by fungicides and a growth regulator. Potatoes may require repeated protection against diseases such as blight. One physical hectare can therefore appear many times in the treated-area statistics.

The Scottish Government's 2024 survey estimated that 98 per cent of the country's arable area received at

least one pesticide treatment. The average treated arable field received four spray applications, excluding seed treatment, although use varied sharply by crop.

Spring barley dominates Scottish arable farming, accounting for more than half the area surveyed. Wheat represented another fifth.

Potatoes demonstrate how intensive crop protection can become. Ware potatoes receiving pesticide treatment averaged 13.5 applications and seed potatoes 10.7. Those figures describe pesticide operations rather than thirteen different highly toxic chemicals, and individual treatments can involve substances with very different risk profiles.

“Pesticide” itself covers a wide range of products: herbicides, fungicides, insecticides, molluscicides, nematocides, growth regulators, seed treatments and some biological and physical controls. A tonne of one substance cannot automatically be compared with a tonne of another. Toxicity, persistence, mobility through soil, effects on aquatic life and danger to non-target insects vary considerably.

Scotland’s pesticide story therefore cannot be understood from tonnage alone.

But neither can the scale be ignored.

## **The spraying does not stop at the farm gate**

Scottish councils are substantial pesticide users in their own right.

The latest nationwide survey of council weed control is now old enough to create an information problem of its own. It records activity in 2019 and was published in 2022.

Twenty-seven councils, representing most of Scotland’s population, reported applying 15.2 tonnes of herbicide active substance. Almost 99 per cent by weight was glyphosate.

The chemicals were being used for familiar municipal work: controlling weeds pushing through pavements, vegetation around street furniture, invasive plants, roadside growth, parks and other public spaces.

Where councils specified the type of surface being treated, 55 per cent of herbicide applications were made to hard surfaces.

That changes the pathway a chemical can take.

On cultivated land, water can infiltrate soil. On concrete, paving and tarmac it may instead travel towards gutters, gullies and drainage systems.

Councils themselves were already trying to reduce chemical dependence. Every authority responding to the 2019 survey reported measures intended to minimise herbicide use, while environmental concerns were the leading reason given for adopting non-chemical methods. Three councils had prohibited or restricted glyphosate on some surfaces and another was reviewing its use.

Yet Scotland cannot currently answer a simple national question: how much herbicide are all 32 councils applying now?

Agricultural pesticide surveys continue to be refreshed.

The comparable national council weed-control figure remains anchored in 2019.

## The pesticide network inside homes, farms and food stores

Councils also deploy rodenticides. A Scottish Government survey found that 27 local authorities used approximately 12.2 tonnes of rodenticide bait during 2023. The figure initially appears large, but almost all that weight was food material used to attract rats and mice. The active rodenticide contained in the bait amounted to less than one kilogram.

About 8.8 tonnes of bait was used in domestic settings. Councils also treated industrial and commercial premises and, in some areas, agricultural holdings on behalf of farmers. More than 99 per cent of the rodenticide products used by weight were based on second-generation anticoagulants, with bromadiolone the principal active substance.

These poisons create a different environmental pathway from crop sprays because the animal that consumes them can move. A poisoned rat or mouse may leave a building before it dies and subsequently be eaten by a fox, owl, buzzard or another scavenger. Anticoagulant residues can persist particularly in liver tissue, allowing the chemical to move through a food chain even though the predator never encountered the original bait.

Scottish wildlife surveillance has repeatedly detected anticoagulant rodenticides in non-target species. The problem is sufficiently established that rodenticide stewardship requires bait to be controlled, carcasses to be recovered where possible and exposure beyond the intended pest species to be minimised. Scottish Government reporting has also recorded the withdrawal of authorisation for second-generation anticoagulant rodenticides for some open-area uses after 2024.

The connection with food production is equally close.

In 2024 Scottish arable farms used an estimated 46 tonnes of rodenticide products, around 25 tonnes of them bromadiolone products. Ninety-two per cent of rodenticide bait by weight was grain-based, and farms using rodenticides were significantly more likely to have grain stores.

Bromadiolone is not authorised for application to food crops. Grain manufactured as poisoned bait is not grain intended for milling or human consumption, and rodenticides must be kept away from food and animal feed.

Those precautions exist because accidental transfer is possible.

Government guidance for livestock and poultry premises specifically warns against contamination of feedstuffs, animals and products such as eggs. Experimental research has also demonstrated that bromadiolone can pass into egg yolk when laying hens consume poisoned bait.

Scotland's pesticide-poisoning records contain a more direct example of what can happen when those controls are deliberately ignored. In 2011 investigators examined an incident in which bread had been adulterated with blue bromadiolone-treated grain and left where a dog encountered it. The animal survived. It was recorded as deliberate misuse rather than normal pest control, but the case demonstrates how easily a rodenticide carried in edible grain bait can be moved into something that resembles ordinary food.

Domestic animals introduce another pesticide route altogether.

Many flea and tick treatments used on cats and dogs contain potent insecticidal substances. Among them are fipronil and imidacloprid, chemicals designed to remain effective on an animal's skin or coat after treatment. Their usefulness against parasites also means residues can persist long enough to leave the animal through washing, bathing, contact with household surfaces or wastewater.

SEPA's 2024 monitoring programme looked specifically for these compounds in Scottish waters.

Fipronil was detected at least once at 16 per cent of the surface-water locations sampled. Imidacloprid appeared at four per cent. The highest concentration of fipronil was measured in the Quhomery Burn, a tributary of the River Ugie in Aberdeenshire, while the highest imidacloprid concentration was recorded in the River Annan in Dumfries and Galloway.

Neither substance was detected in the 24 groundwater samples included in the programme.

Those detections do not establish that every residue originated with household pets. They do demonstrate that pesticidal chemicals associated with veterinary treatment are reaching Scottish rivers.

The route is fundamentally different from a tractor spraying a field. A cat treated inside a home, a dog washed after receiving flea medication, a poisoned rat leaving a building and a bait station beside a grain store all sit within the same larger chemical system.

Scotland's pesticide use therefore does not end at the farm gate. It reaches cereal stores, livestock buildings, pavements, parks, kitchens, pets, drains and rivers — and in some cases continues moving after the original treatment has already done its job.

## The river supplying Peterhead

The River Ugie flows through an intensively farmed part of Aberdeenshire before contributing raw water to the Forehill treatment works serving Peterhead and surrounding communities.

By 2011 the Drinking Water Quality Regulator considered the pesticide risk serious enough to require formal action from Scottish Water.

The regulator identified chlortoluron, isoproturon, 2,4-D, linuron, MCPA, MCPP, metazachlor and metaldehyde among the substances capable of threatening compliance with the drinking-water standard.

Individual pesticides in drinking water are subject to a prescribed concentration of 0.1 micrograms per litre.

Nine pesticide exceedances were recorded nationally during 2011, most associated with the Forehill supply. The regulator attributed the contamination to pesticides entering the Ugie from intensive agricultural activity in the catchment.

Scottish Water initially worked with farmers and others to reduce losses from land.

Eventually, treatment had to change as well.

A granular activated-carbon stage was introduced at Forehill in 2014 specifically to improve pesticide removal. A regulatory inspection the following year described it as successful.

Later Scottish research still found metaldehyde above the 0.1 microgram-per-litre threshold in raw water from both the Ugie and the Deveron.

The significance lies in the word raw.

The presence of pesticides in a river supplying drinking water does not mean consumers were routinely being supplied unsafe water. Treatment sits between catchment and tap.

Scotland's public drinking-water performance remains exceptionally high. In 2025, 137,947 regulatory tests were undertaken at consumers' taps and 99.88 per cent met the required standards.

The Ugie story demonstrates something different.

A pesticide can be legally applied to land, leave its intended location, enter a river, reach a drinking-water intake and require additional infrastructure to remove it before the water reaches a home.

The cost of pesticide use therefore does not necessarily remain with the person applying it.

Some of that cost can travel downstream.

## What happens in soil

Water is only one route.

Once a pesticide reaches a field, several things can happen. Some substances break down comparatively quickly, while others bind to clay or organic matter and remain in the soil for longer. More mobile compounds can dissolve in water and move down through the soil profile, while substances attached to soil particles can leave a field with eroded sediment.

The outcome depends on the chemistry of the pesticide, soil type, rainfall, temperature and the interval between application and subsequent weather.

Scotland has considerable information about soil condition, but its own national soil programme acknowledges that important monitoring gaps remain.

The State of Scotland's Soil work identified a lack of systematic monitoring capable of describing all the pressures affecting Scottish soils and their consequences. Subsequent programmes have sought to develop a national monitoring framework, but no simple nationwide pesticide-residue dataset exists comparable with the government's detailed surveys of pesticide application.

That creates an unusual asymmetry.

Scotland can estimate that approximately 1,300 tonnes of pesticide were applied to arable crops in a particular year. It cannot produce an equally comprehensive number for the pesticide residues remaining across Scotland's agricultural soils afterwards.

Those figures would never be expected to match. Many substances degrade, and residues depend on timing, soil type, rainfall, microbial activity and chemistry.

But the difference between measuring application and measuring environmental presence is fundamental.

Scotland is much better at the first.

## The air is an even larger blind spot

Pesticides can also leave their intended targets through the air.

Fine spray droplets can travel with wind. Dust can move beyond the application area. Some substances can volatilise after treatment. Wind speed, nozzle height, droplet size, temperature and atmospheric conditions can all influence the distance travelled.

Operators are required to minimise off-target movement, and product authorisations can specify conditions governing application, buffer zones and spraying methods.

Yet Scotland's principal national air-quality monitoring network measures pollutants such as nitrogen dioxide, particulate matter, ozone, sulphur dioxide and carbon monoxide. Pesticides are not part of the routine pollutant suite presented through that network.

That does not establish widespread pesticide contamination of Scottish air. It means the national system used to tell the public what is in Scotland's air is not designed to answer that question.

There is therefore no comparable nationwide public dataset showing concentrations of agricultural and amenity pesticides in the air across rural Scotland.

The absence of measurements cannot be treated as evidence that residues are present at harmful levels.

Neither can it demonstrate that they are absent.

## **Legal does not mean immobile**

Approval is another point at which public understanding can become muddled.

A pesticide authorised for use in Great Britain has passed a regulatory process assessing whether specified uses meet legal requirements.

It does not follow that the substance is harmless under every condition.

Authorisation can govern the crop, concentration, number of treatments, timing, equipment, operator protection, environmental precautions and distances from sensitive areas. Using an authorised product outside those conditions is unlawful.

But the fact that a farmer or council worker complied with an authorisation does not create an invisible wall around the treated ground.

Chemicals remain subject to rain, wind, drainage, soil chemistry and biology.

That is why drinking-water monitoring, environmental-risk assessments, restrictions on application and buffer zones exist in the first place.

Glyphosate illustrates the difference between approval and permanence particularly clearly.

It remains approved in Great Britain, but its approval has been extended only until 15 December 2026 while the Health and Safety Executive carries out a full renewal assessment using updated scientific, technical and regulatory evidence.

The process considers human toxicology, operator exposure, consumer exposure, environmental fate and effects on non-target organisms.

Its current legal status therefore does not guarantee its future status.

Regulation changes as evidence changes.

## **Scotland has committed to reducing pesticide pressure**

The governments of Scotland, England, Wales and Northern Ireland published a new Pesticides National Action Plan in March 2025.

Its headline target is not a simple ten per cent reduction in tonnes sprayed.

Instead, the governments adopted a Pesticide Load Indicator incorporating 20 measures intended to describe environmental pressure, including toxicity to different organisms and persistence in the environment.

Each indicator is intended to fall by at least ten per cent by 2030 from a 2018 baseline.

The approach recognises a basic flaw in measuring pesticide policy solely by weight.

Removing a large volume of a relatively low-risk substance could produce an impressive tonnage reduction while doing less environmental good than reducing a much smaller quantity of a highly persistent or ecologically damaging substance.

Scotland is also attempting to expand Integrated Pest Management, in which crop rotation, monitoring, resistant varieties, mechanical approaches and biological controls are used to reduce dependence on chemical intervention.

That transition is already visible in parts of Scottish horticulture.

But the national target also exposes another imbalance.

Government can calculate changing pesticide pressure most confidently where it already possesses strong usage statistics.

The further the system moves away from commercial agriculture, the less comprehensive the national picture becomes.

## Sources

Scottish Government, Pesticide Usage in Scotland: Arable Crops and Potato Stores 2024, 29 October 2025.  
<https://www.gov.scot/publications/pesticide-usage-scotland-arable-crops-potato-stores-2024/>

Scottish Government, Pesticide Usage in Scotland: Local Authority Integrated Weed Control Survey 2019, 16 March 2022.  
<https://www.gov.scot/publications/pesticide-usage-scotland-local-authority-integrated-weed-control-survey-2019/>

Scottish Government, Pesticide Usage in Scotland: Rodenticide Use by Local Authorities 2023, 12 March 2025.  
<https://www.gov.scot/publications/pesticide-usage-scotland-rodenticide-use-local-authorities-2023/>

Scottish Government, Pesticide Usage in Scotland: Rodenticides on Arable Farms 2024, 2025.  
<https://www.gov.scot/publications/pesticide-usage-scotland-rodenticides-arable-farms-2024/>

Scottish Government, Pesticide Poisoning of Animals in Scotland 2011, Wildlife Incident Investigation Scheme, 2011.

UK Government, Code of Practice: Prevention and Control of Rodent Infestations on Poultry Farms, current guidance.  
<https://www.gov.uk/government/publications/code-of-practice-prevention-and-control-of-rodent-infestations-on-poultry-farms>

European Food Safety Authority, Review of the Existing Maximum Residue Levels for Bromadiolone, 2020.  
<https://pubmed.ncbi.nlm.nih.gov/32625497/>

Scientific study, Bromadiolone Residues in Eggs Following Exposure of Laying Hens, 2010.  
<https://pubmed.ncbi.nlm.nih.gov/20875232/>

Scottish Environment Protection Agency, Water Quality Monitoring 2024: Pet Treatments, current publication. <https://beta.sepa.scot/topics/chemicals/water-quality-monitoring-2024-pet-treatments/>

Drinking Water Quality Regulator for Scotland, Forehill Supply Zone — Undertaking under the Water (Scotland) Act 1980, May 2011.

<https://dwqr.scot/media/xqdjgmti/forehill-supply-zone-peterhead-may-2011.pdf>

Drinking Water Quality Regulator for Scotland, Annual Report 2011.

<https://dwqr.scot/media/uj4kzbio/dwqr-annual-report-2011.pdf>

Drinking Water Quality Regulator for Scotland, Technical Inspection of Forehill Water Treatment Works, March 2015. <https://dwqr.scot/media/l4yfc2t/forehill-wtw-aberdeenshire-march-2015.pdf>

Scottish Government / Drinking Water Quality Regulator, Drinking Water in Scotland 2025, 27 August 2026.

<https://www.gov.scot/news/drinking-water-in-scotland-2025/>

Plant Health Centre, Assessing the Impact of Metaldehyde Withdrawal in Scotland, 2018.

[https://www.planthealthcentre.scot/sites/www.planthealthcentre.scot/files/2019-02/phc2018\\_02\\_project\\_report\\_-\\_metaldehyde\\_with](https://www.planthealthcentre.scot/sites/www.planthealthcentre.scot/files/2019-02/phc2018_02_project_report_-_metaldehyde_with)

Scotland's Soils, Soil Monitoring, current guidance.

<https://soils.environment.gov.scot/soils-in-scotland/soil-monitoring/>

Scottish Air Quality, Pollutant Coverage of the Air Quality Scotland Network, current data.

<https://www.scottishairquality.scot/data/sos/pollutants>

Health and Safety Executive, Active Substance Renewal: Glyphosate, current as September 2026.

<https://www.hse.gov.uk/pesticides/active-substances/glyphosate-renewal.htm>

UK Government, Scottish Government, Welsh Government and Northern Ireland Executive, UK Pesticides National Action Plan 2025, 21 March 2025.

<https://www.gov.uk/government/publications/uk-pesticides-national-action-plan-2025>

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INFRASTRUCTURE | 28 September 2026

# New Report Proposes Moving Scotland's School-Education Functions Out of 32 Council Authorities

Read online: <https://modern.scot/new-report-proposes-moving-scotlands-school-education-functions-out-of-32-council-authorities/>



Scotland's 32 councils could cease to operate as individual education authorities under a new reform proposal published by the Scottish Government today, with responsibility for school education transferred to larger Local Schools Authorities and much of the money for schools sent directly to those bodies by national government.

The recommendations have been made by John Wilson, the former Broughton High School headteacher

appointed as the Scottish Government's Independent Professional Adviser on school reform. They have not been adopted by ministers. Education Secretary Màiri McAllan has instead opened a three-month dialogue with local authorities before the Government decides how it will respond.

The 135-page report, *Shaping the Future: Strengthening Scotland's Education System Through Empowered Schools*, ranges across funding, school improvement, teacher recruitment, national education bodies and the powers exercised by headteachers. Its most substantial structural recommendation is that the statutory responsibility now exercised separately by 32 education authorities should be consolidated into a smaller system of Local Schools Authorities, requiring changes to legislation.

## From 32 Council Education Authorities to Larger School Authorities

Scotland's present system is rooted principally in the Education (Scotland) Act 1980. Local authorities are the education authorities and have the legal duty to secure adequate and efficient school education in their areas. Education Scotland describes the 32 authorities as responsible for statutory requirements, national education policies, education spending and continuous improvement, while councils also manage school estates and organise support around their own local structures.

Wilson proposes separating that education-authority structure from the existing one-council, one-education-authority arrangement. The new Local Schools Authorities would be formed from existing local-government structures and would absorb the school-education functions currently undertaken by individual councils. The report envisages each authority beginning with a baseline of between 80,000 and 100,000 primary and secondary school-age learners, although geography, population density and physical size would be allowed to alter that figure. No boundaries or final number of authorities are proposed.

The stated case for consolidation is that larger organisations could provide stronger specialist support, reduce repeated administrative functions, gain economies of scale and deal more consistently with national education bodies. The report points to existing cross-council collaboration as evidence that shared working can produce practical benefits. The Northern Alliance, covering eight local authorities, is cited for developing a common learning, teaching and assessment framework, while the Tayside partnership is credited with

widening senior-phase choices through collaboration and a virtual campus.

Larger authorities would also change the proximity of education governance. Decisions currently made within one council area would increasingly be made across council boundaries. The report attempts to preserve elected involvement by assuming that Scotland's 32 councils themselves would remain and creating Education Executive Boards for the new school authorities. Councillors from the participating councils would sit on those boards in proportion to the populations they represent, alongside interaction with senior education officials and education-sector representatives.

That model retains a place for local democratic representation, but the relationship would be different. A councillor sitting on an individual council education committee currently operates within the authority that carries the statutory education duty. Under Wilson's proposal, the statutory duty would sit with the larger Local Schools Authority and councillors would exercise influence through a shared cross-boundary board.

During development of the report, members of the Scottish Government and local-government Education and Childcare Assurance Board raised this broader issue. Minutes from February record concerns about the review's concentration on primary and secondary schools, the absence at that stage of specific consideration of early learning and childcare and additional support needs, and whether the work sufficiently reflected the wider local-government system in which education sits alongside other public services. Members nevertheless welcomed Wilson's engagement and the value of examining the system from a school leader's perspective.

## School Funding Would Take a Different Route

The governance proposal is tied directly to a change in how education money moves from the Scottish Government to schools.

At present, most of the money councils use for education arrives within the wider local-government settlement rather than as a separately protected school budget. Councils determine how much of their resources will be allocated to education after meeting statutory obligations and considering local priorities. Specific programmes, including parts of the Scottish Attainment Challenge, are among the exceptions that are protected for particular purposes.

The scale of the expenditure involved is substantial. Wilson's report records projected direct Scottish Government funding to local authorities of approximately £15.2 billion in 2025-26. Education Services accounted for planned spending of a little over £8 billion, after just under £8 billion in 2024-25, and represented approximately half of councils' general-fund net revenue expenditure.

Wilson recommends defining what constitutes school-education spending nationally and ring-fencing that money. If Local Schools Authorities were created, General Revenue Grant and Specific Revenue Grant funding intended for school education would be paid directly by the Scottish Government to the new authorities. Their senior officers would then carry financial responsibility for those budgets, while schools would operate within strengthened Devolved School Management arrangements.

The argument in favour of the proposal is partly one of traceability. The report found substantial variation in how councils define, record and distribute education expenditure. Wilson records that it proved difficult during the review to establish precisely what was included within education spending from one authority to another, making comparisons between funding and outcomes difficult. The proposed system would retain existing pupil and geographical factors initially when calculating allocations, while national and local partners would subsequently refine the formula.

Ring-fencing would also protect money assigned for school education from being redirected to other council pressures. For headteachers who have been told nationally that additional education money is being provided while simultaneously facing reductions or restrictions locally, that could produce greater certainty over the resources available to their schools.

The opposing argument arises from the same local-government funding system. Councils are responsible for services whose effects overlap: social work, transport, libraries, community facilities, poverty programmes and other provision can all affect children before they enter a classroom. COSLA told Wilson's review that ring-fencing can reduce the ability of elected councils to respond to their own local circumstances and can result in greater pressure on services whose funding is not protected.

Wilson accepts that concern within the report. The present system allows councillors and senior officials to redirect resources as needs change. A protected education budget would increase certainty for schools but reduce that freedom elsewhere in the council budget. The proposal therefore combines stronger protection for education expenditure with a narrower range of choices for councils managing several interdependent public services.

## **The Report Finds School Autonomy Varies Considerably**

The proposed reorganisation is not intended simply to replace one group of administrators with another. Wilson links consolidation to greater authority for individual schools.

Scotland already has national Devolved School Management guidance under which a large proportion of school expenditure is intended to be delegated. The report says between 90 and 95 per cent of school funding should, in theory, pass through those arrangements. The principles include subsidiarity, transparency and giving headteachers substantial flexibility to respond to their own school communities.

Wilson found markedly different experiences between authorities. Some headteachers told the review that they had considerable freedom to move money between budget headings. Others said they could not determine their own staffing structures, were prevented from carrying money forward for longer-term plans or received usable budget information very late in the financial year.

The report therefore proposes national implementation of the Devolved School Management guidelines in full, with HM Inspectors assessing implementation from 2027-28. It also proposes that Local Schools Authorities provide schools with finance administration, legal services, health-and-safety support, HR and recruitment systems, core IT and school-estate services.

Giving headteachers more control over staffing and resources could allow schools to respond differently to deprivation, additional support needs or local curriculum demand. It also transfers more responsibility to school leaders. Headteachers consulted for the review themselves raised concern about additional administrative burdens accompanying greater budget control, while Wilson argues that expanded autonomy would have to be matched by dedicated professional support from the larger authority.

The report records another part of the relationship between schools and councils that is less visible in financial accounts. Wilson says some school leaders told him they were discouraged from discussing education policy directly with elected councillors. In one case reported to him, a school leader who involved parents in examining the implications of council policy was accused of "weaponising parents". The report presents this as evidence supplied during the review, not as a finding about general practice across Scotland.

## Schools Would Also Be Grouped More Formally

Below the Local Schools Authorities, Wilson proposes a second level of collaboration.

Schools would be organised into formal neighbourhood groups containing a notional minimum of 5,000 learners, adjusted where necessary for rural areas and densely populated cities. Existing clusters would be developed into more formal 3-to-18 learning communities, intended to coordinate curriculum, teaching and professional development between primary and secondary education. A school-group leader would rotate among participating schools and be accountable to the Local Schools Authority board.

The model draws upon collaboration already occurring between schools and councils rather than starting from a completely new concept. Regional Improvement Collaboratives were created during the previous school-empowerment programme, and some partnerships continued even as the original structures evolved. Wilson records both sides of that experience: some participants questioned whether the collaboratives amounted to an additional layer of administration, while others developed shared teaching approaches and expanded course provision.

Any new structure would therefore have to reconcile two objectives contained in the report itself: increasing collaborative capacity while reducing the complexity that educators say already surrounds them.

## A Proposal That Follows an Earlier Attempt to Empower Schools

The direction has roots in reforms begun almost a decade ago.

The Scottish Government's 2016 governance review began from the proposition that more decisions should be taken at school level. A proposed Education Bill was subsequently replaced by a 2018 Joint Agreement between national and local government, including the Headteachers' Charter and revised Devolved School Management guidance. John Swinney told Parliament in 2019 that sufficient progress had been made through partnership to continue without legislation.

Wilson's report takes the view that implementation of that settlement has been uneven. It says the degree of school-level subsidiarity envisaged in 2018 has not become consistent across the country and recommends putting elements of the system into a new statutory structure.

The evidence-gathering behind the new report extended beyond headteachers. The formal call for views went to 35 local-government organisations, including COSLA, the Association of Directors of Education in Scotland and SOLACE, with a reported 98 per cent response rate; all eight trade-union and professional-body organisations invited responded. Wilson also met teacher unions, school-leader organisations, local-government finance directors, council officials, national education bodies and existing regional partnerships.

## Changing Structures Would Not by Itself Supply Missing Teachers

One of the practical constraints identified in the report sits outside the proposed authority boundaries.

Wilson describes teacher recruitment and workforce planning as an obstacle to improvement. For secondary postgraduate teacher training in 2024-25, only Drama, History and Physical Education filled the places available among 20 subjects cited by the report. Uptake of available places was recorded at 31 per cent for Computing, 31 per cent for Technology Education, 54 per cent for Biology, 34 per cent for Chemistry and 22 per cent for Physics.

Those figures do not mean every unfilled training place equates directly to an unfilled teaching post, but Wilson uses them to illustrate the difficulty of matching future teacher supply to what schools need. The report proposes nationally coordinated workforce planning based on pupil projections, subject demand, geographical shortages, staff turnover and flexible-working patterns, with consideration of incentives in subjects or areas where recruitment is persistently difficult.

Scotland had 53,475 teachers and 695,923 pupils in its publicly funded schools at the 2025 census. The overall pupil-teacher ratio was 13.2, although national totals do not reveal subject-specific or geographical vacancies.

The report therefore treats workforce reform as a condition required alongside governance change rather than something that would automatically follow from creating larger education authorities.

## **A New National Executive Director of Education**

Wilson also proposes a new coordinating function above the school-authority level.

An Executive Director of Education would work alongside the heads of Scotland's national education organisations and a panel of advisers. The person would be described as politically informed but not politically affiliated to the Government, with responsibility for coordinating national strategy, identifying overlap between national organisations and assessing whether schools and local authorities have the capacity to implement policy within the timetable being proposed.

The proposal comes while the national landscape itself is being reorganised. Qualifications Scotland has replaced the Scottish Qualifications Authority, HM Inspectorate of Education has been established separately, Education Scotland is being refocused and the Centre for Teaching Excellence has been created. Wilson says respondents described national responsibilities as cluttered and sometimes unclear.

A coordinating director could provide a single point through which those programmes are aligned. It would also create an additional senior position within a system already containing ministers, civil servants, agency chief executives, inspectors, national boards and, under these proposals, Local Schools Authorities. The report leaves the Cabinet Secretary politically accountable for the education system and describes the director principally as a coordinating rather than ministerial office.

## **The Government Now Has Three Months of Council Discussions**

McAllan has described the report as a contribution to discussions with local government rather than a settled blueprint. The Scottish Government says the dialogue will last three months and that it will respond to Wilson's recommendations after that process.

That process will have to move from the report's proposed architecture to the practical design of any system ministers decide to pursue. Wilson establishes a suggested scale for Local Schools Authorities and the functions they would perform, but does not allocate Scotland's councils to particular authorities or publish proposed boundaries. Implementation of the central governance recommendation would require legislation.

The discussions will also take place while schools are already adapting to a revised curriculum, new national education organisations, changes to inspection, additional-support reform and continuing teacher-workforce pressures. Earlier this month McAllan told Parliament that the revised curriculum is intended to be implemented in all schools from August 2028, while describing public-service reform and school empowerment as another strand of the Government's education programme.

## Sources

Shaping the Future: Strengthening Scotland's Education System Through Empowered Schools — Scottish Government, 28 September 2026.

<https://www.gov.scot/publications/shaping-future-strengthening-scotlands-education-system-through-empowered-schools/>

Empowering schools — Scottish Government, 28 September 2026.

<https://www.gov.scot/news/empowering-schools/>

Education and Childcare Assurance Board minutes: February 2026 — Scottish Government, published 24 June 2026; meeting held 3 February 2026.

<https://www.gov.scot/publications/education-and-childcare-assurance-board-minutes-february-2026/>

Pupil and teacher characteristics 2025 — Scottish Government, first published 9 December 2025; updated 24 March 2026. <https://www.gov.scot/publications/pupil-and-teacher-characteristics-2025/>

Local authority roles and duties — Education Scotland, last updated 31 October 2025.

<https://education.gov.scot/about-education-scotland/local-authority-role-and-duties/>

Education (Scotland) Act 1980 — UK Legislation. <https://www.legislation.gov.uk/ukpga/1980/44>

Empowering Schools: education reform progress update — Scottish Government, 25 June 2019.

<https://www.gov.scot/publications/empowering-schools-education-reform-progress-update/>

Scotland's education reform: ministerial statement — Scottish Government, 25 June 2019.

<https://www.gov.scot/publications/ministerial-statement-update-scotlands-education-reforms/>

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POLICY AND GOVERNMENT | 30 September 2026

# COSLA Tells Ministers Council Reform Must Be Agreed, Not Imposed

Read online: <https://modern.scot/cosla-tells-ministers-council-reform-must-be-agreed-not-imposed/>



Scotland's council body has formally responded to proposals for six to ten regional authorities and 120 to 160 community authorities, asking ministers to commit that structural changes will proceed only through agreement with existing local government.

Scotland's council leaders have asked the Scottish Government to commit that major changes to local government will be implemented only through agreement with existing local authorities, setting an

early condition around negotiations over the proposed redrawing of the country's council system.

COSLA adopted the position after council leaders met on 25 September, four days after ministers published an opening proposal built around between six and ten regional authorities and between 120 and 160 smaller community authorities. The organisation says it will participate fully in the reform discussions but has called for evidence, meaningful engagement and agreement between Scottish and local government before significant structural change is made.

Modern Scot examined the Government's opening model and its historical context on 21 September in John Swinney Signed Scotland's Local-Integration Reform in 2011. Now He Is Redrawing the System. The COSLA response adds the first collective position from the country's 32 existing councils to that developing story.

It also makes an important distinction clearer. The Scottish Government has proposed a direction for reform. It has not settled the map, the final distribution of powers, the funding system or the future location of social-care responsibilities. COSLA has agreed to take part in that process. It has not agreed to the model that ministers have placed on the table.

## The Government's opening structure

The September proposal is described by the Scottish Government as an opening proposition rather than a final design.

It envisages replacing the present local-government arrangements with six to ten larger regional authorities and 120 to 160 community authorities. Bespoke arrangements could be considered for Scotland's island communities. Councillors would continue to be elected at the present ward level and could sit on both the community authority and the corresponding regional authority, while a common regional administrative and corporate structure would support the two levels.

The possible division of responsibilities is beginning to take shape. Regional authorities could assume enhanced responsibility for economic development and business support, housing, strategic planning, employability and elements of transport, while also carrying major existing council functions including waste, cleansing, resilience, regulatory services and education.

Community authorities could take responsibility for more localised decisions including householder planning applications, community planning, licensing, historic-environment matters, greenspace, town-centre regeneration and some leisure, sport and cultural provision. Ministers have also proposed a statutory obligation requiring regional authorities to devolve appropriate functions to the community level.

That creates a system that is simultaneously larger and smaller than the present one: strategic services would move above the scale of most current councils, while other functions would move below them.

The Government has not yet drawn the six to ten regional boundaries. It has not fixed the 120 to 160 community areas. Nor has it produced a completed schedule showing where every statutory function presently exercised by Scotland's councils would sit.

Those omissions are not administrative details. They determine where decisions are made, which elected body is accountable for them and what staff, assets and budgets must move with the responsibility.

## **COSLA asks for agreement before implementation**

COSLA's response does not reject reform in principle. Council leaders said the system should evolve where evidence shows that change would improve public services, and they said communities and council employees should be meaningfully involved in the work.

The organisation's clearest request concerns the authority under which change would proceed.

COSLA said significant changes to local government must be agreed between Scottish and local government and called on ministers to commit that any changes would be implemented only through agreement with existing local authorities.

That is an institutional and political position rather than, by itself, a legal veto. The Scottish Parliament can legislate within devolved competence, and COSLA's statement does not give each council an independent statutory power to block legislation.

It does, however, establish a clear question for the negotiations now beginning: whether ministers will accept local-government agreement as a condition of the reform programme rather than treating consultation with councils as one part of a process ultimately determined by central government and Parliament.

The distinction is particularly important because the proposed changes reach beyond boundaries. A merger or replacement of authorities also raises questions about ownership of land and buildings, inherited debt, pension liabilities, contracts, staff transfer, council-tax administration, business rates, statutory planning functions, education responsibilities and the future of bodies whose membership or finances depend on the present council map.

None of those issues can be resolved simply by drawing six to ten regions on a map.

## **Funding cannot be separated from functions**

The Scottish Government's proposal acknowledges that the eventual financial settlement depends on decisions that have not yet been made.

Ministers say the responsibilities that should sit at national, regional and community level must be determined before the corresponding funding arrangements can be designed. That includes decisions about how money is distributed and what revenue-raising powers should be available to future local and regional authorities.

This sequencing is significant. A community authority with substantial statutory duties but little control over revenue would be a different institution from one able to raise and retain meaningful income. A regional authority carrying education, waste, housing and transport responsibilities would require a financial base very different from a body established principally for strategic coordination.

The same problem applies to assets and liabilities. Existing councils own schools, depots, offices, housing, land, vehicles and infrastructure. They also hold debt, employ staff and participate in pension arrangements. If the 32-authority structure is replaced, legislation and transition agreements will have to establish where those responsibilities go.

The Government's current paper does not provide those answers. It sets the direction in which ministers want the discussion to proceed.

## **Social care remains outside any settled map**

The future of social care and social work adds another unresolved layer.

The Government says all options should be considered in the context of both the proposed local-government structure and its separate changes to the NHS. Ministers have committed to discussing the position with councils, trade unions, healthcare organisations and providers.

That means local-government reform cannot be read independently from the wider public-sector programme now under way. Scotland is simultaneously examining health-board structures, national public bodies, shared digital infrastructure, data exchange and the relationship between national, regional and community decision-making.

A function that leaves an existing council could therefore move in several possible directions: to a larger regional authority, to a smaller community authority, to a national body, or into a structure shared with another part of the public sector.

The Government's stated objective is to improve services and move decisions to the level at which they can be delivered most effectively. COSLA's response is focused on who gets to decide what that level should be.

## **A timetable now runs to the end of the year**

The Government wants to reach a shared direction on reform before the end of 2026. It has said early decisions could be capable of informing the first Budget of this parliamentary term.

That leaves only a short period in which ministers and councils must move from broad structures to questions that are considerably more difficult: geography, powers, money, staffing and the legal route to transition.

The timing also places the discussion ahead of the next Scottish local elections, a point COSLA itself has highlighted. Councillors elected to the existing 32 authorities could enter office while negotiations are continuing over the future shape of those authorities.

What has changed since the Government published its proposal on 21 September is therefore not the map. There still is no final map.

It is the negotiating position around it.

Ministers have said their proposal is an opening proposition and that they want common ground. Scotland's

council leaders have now stated the basis on which they want that common ground to be built: evidence, participation and agreement with the local authorities that would be replaced or reorganised.

The next stage will show whether that request becomes part of the Government's process or remains one side's position within it.

## Sources

- Scottish Government — Public sector reform: proposal, 21 September 2026. Read the proposal.
  - COSLA — COSLA respond to Scottish Government plans to reform Local Government, 25 September 2026. Read the COSLA response.
  - Scottish Government — Programme for Government 2026 to 2031, 1 September 2026. Public-service reform commitments.
  - Modern Scot — John Swinney Signed Scotland's Local-Integration Reform in 2011. Now He Is Redrawing the System, 21 September 2026. Read the earlier Modern Scot investigation.
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ECONOMY | 30 September 2026

# The EU Antimicrobial Restriction on Brazilian Meat Is Now in Force. Great Britain Still Allows Brazilian Beef

Read online: <https://modern.scot/the-eu-antimicrobial-restriction-on-brazilian-meat-is-now-in-force-great-britain-still-allows-brazilian-beef/>



The regulatory divergence forecast by Scotland's meat industry in August has now happened. Brazil lost European Union authorisation for several categories of animal products on 3 September, while Great Britain continues to maintain an import route for beef from approved Brazilian states.

The European Union's new antimicrobial import rules have taken effect, removing Brazil from the authorised list for several categories of animal products while

Great Britain continues to permit Brazilian beef under its own import regime.

The change took effect on 3 September and turns a regulatory difference that was still prospective in August into one now operating in law.

Modern Scot reported on the approaching split on 17 August in Britain Will Keep Brazilian Meat Market Open as EU Restrictions Begin, after Scottish farming and meat organisations urged the UK Government to mirror the European approach unless Brazil could demonstrate equivalent controls. At that point the central question was what would happen when the EU deadline arrived. The deadline has now passed.

The development does not establish that Brazilian meat entering Great Britain is unsafe. Nor does the European action amount to a finding that every Brazilian animal product contains prohibited antibiotics. The issue is one of the production guarantees and traceability required for access to the EU market.

## Why Brazil came off the European list

The European rules extend parts of the EU's antimicrobial policy to animals and animal products imported from outside the bloc.

For covered products, exporting countries must provide official guarantees that animals have not been produced using antimicrobials to promote growth or increase yield and that certain antimicrobial medicines reserved for treating serious infections in humans have not been used contrary to the European requirements.

The system operates through a country-and-commodity list. A country can be authorised for one type of product and not another, depending on the guarantees accepted by the European Commission.

In June, the Commission amended that list after concluding that it had not received sufficient information demonstrating that Brazil would meet the new requirements by the September deadline for a series of products. The amendment removed Brazil's authorisation in the relevant categories for bovine, equine and poultry products, aquaculture, honey and casings from 3 September.

That is a regulatory assurance decision. The EU is requiring evidence covering how animals were raised and medicines were used, not simply testing finished meat at the border for residues.

That distinction is important because residue testing and production assurance answer different questions. A laboratory can test a sample for particular substances. A production-chain guarantee is intended to establish that prohibited practices were not used in the first place and that the exporting country can trace and certify compliance.

## **Great Britain continues to operate its own import arrangements**

Great Britain — England, Scotland and Wales — has not copied the EU's 3 September listing decision.

UK Government veterinary guidance updated on 25 September continues to identify Brazilian states approved for beef exports to Great Britain: Minas Gerais, Espírito Santo, Goiás, Mato Grosso, Rio Grande do Sul, Mato Grosso do Sul, Paraná and São Paulo.

That particular guidance concerns certification connected with animal-health requirements, including foot-and-mouth disease. It is not a British declaration that Brazil has demonstrated equivalence with the new EU antimicrobial rules.

Its relevance is narrower: the Great Britain import route for eligible Brazilian beef remains open after the date on which the European Union removed Brazil from the relevant antimicrobial-compliance list.

This is the divergence Scotland's meat sector warned about during the summer.

The Scottish Red Meat Resilience Group had argued that British producers were already subject to restrictions on using antibiotics as growth promoters and that imported meat should be required to demonstrate comparable production standards. The group also raised the possibility that products unable to enter the EU could be redirected towards Great Britain.

That second proposition remains a question rather than an established outcome.

The rules now make diversion possible in principle because the two markets are applying different requirements. Whether substantial diversion has actually occurred can be answered only with trade data covering the period after 3 September.

## **Poultry and honey may move faster than beef**

The European position is not necessarily permanent for every Brazilian product.

European Commission officials said in September that an EU audit in Brazil had examined poultry and honey. Once the audit report is complete, a positive outcome could allow the Commission to propose returning those commodities to the authorised list, subject to the required member-state procedure.

Beef presents a different problem.

The Commission has said its rules require guarantees covering the lifetime of cattle and that the information then available from Brazil did not provide those assurances. At a press briefing on 7 September, Commission officials distinguished the beef issue from the poultry and honey audit and indicated that it was not expected to be resolved within the following few months.

The list can be amended when the Commission is satisfied that a country has provided the necessary evidence.

The present restriction should therefore be understood as the current regulatory position rather than an indefinite ban fixed permanently in law.

It also means different Brazilian export sectors could regain European access at different times.

## The next question is what actually entered Britain

Before 3 September, the Scottish industry's concern could only be tested against scenarios.

Now it can be tested against consignments.

The most important next evidence will be the volume and value of Brazilian beef and poultry entering Great Britain after the European restriction took effect, compared with the same period in previous years and with Brazilian exports to the EU.

Border inspection and sampling data will add another layer. The UK maintains controls for imported animal products, including documentary checks, identity checks and risk-based physical or laboratory testing. Those controls should not be described as identical to the EU production-assurance requirement simply because both concern imported food.

The difference is exactly what makes the post-September data important.

If Brazilian exports to Great Britain remain broadly within their previous pattern, the feared trade diversion may prove limited. If they rise sharply while the corresponding European market is restricted, the Scottish meat sector's warning will have measurable evidence behind it.

Price also matters. Any change in import volumes would have to be considered alongside exchange rates, Brazilian cattle prices, domestic British supply, consumer demand and other trade movements before attributing it solely to the EU rule.

That caution does not remove the regulatory fact now in place.

From 3 September, the EU required Brazil to satisfy a set of antimicrobial production guarantees for the affected products and removed authorisation where it concluded those guarantees had not been provided. Great Britain did not mirror that action and continues to maintain a route for eligible Brazilian beef.

The August story was about an approaching divergence. The September story is that the divergence has arrived.

The next one will be about what moved through it.

## Sources

- European Commission — EU antimicrobial rules for imports of animals and animal products, current guidance. European Commission guidance.
- European Union — Commission Implementing Regulation (EU) 2026/1189, 4 June 2026, applicable from 3 September 2026. Read the regulation.
- European Commission — Midday press briefing on the Brazilian poultry, honey and beef position, 7 September 2026. Commission briefing.
- UK Government — Amendment to supplementary guarantee H in the fresh meat of ungulates list to facilitate correct certification of Brazilian beef, updated 25 September 2026. Read the veterinary guidance.

- Modern Scot — Britain Will Keep Brazilian Meat Market Open as EU Restrictions Begin, 17 August 2026. Read the earlier Modern Scot report.
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ECONOMY | 30 September 2026

# After Scotland Lost Hundreds of Bank Branches, Shared Hubs Are Building a Different Network

Read online: <https://modern.scot/after-scotland-lost-hundreds-of-bank-branches-shared-hubs-a-re-building-a-different-network/>



The rapid disappearance of conventional branches is now being followed by an expanding system of shared banking hubs. They restore cash services and scheduled face-to-face access, but they do not recreate the bank branch that disappeared.

Scotland's retreat from traditional high-street banking is producing a second physical network in its place: shared premises where customers of competing banks use the same counter and wait for their own institution's representative to visit on a particular day of the week.

The banking-hub system has moved far beyond the two-community experiment that began in 2021. Cash

Access UK now says 237 hubs are operating across the United Kingdom, alongside more than 140 separate deposit services, with the broader network handling nearly one million customer visits or transactions a month. LINK, which assesses the effect of branch closures and gaps in access to cash, said by 28 September that 283 banking hubs had been recommended.

Modern Scot reconstructed the scale of the preceding branch closures in August in *A Country Without Tellers: How Scotland Lost Its Banks*. That investigation found a country in which hundreds of conventional branches had disappeared and in which shared hubs were emerging as the principal physical response when access to cash became inadequate.

The hub network is now large enough to examine separately from the closures that created the need for it.

## A banking hub is not another bank branch

A banking hub is a shared facility established through Cash Access UK rather than a branch belonging to one bank. Its ordinary counter service is operated by the Post Office and is generally available from Monday to Friday between 9am and 5pm.

Customers of participating banks and building societies can use that counter for routine transactions such as cash deposits and withdrawals, paying in cheques, checking balances, paying utility bills and obtaining change for registered businesses.

More complicated banking is provided through a different system. Individual banks send community bankers to the hub on scheduled days, allowing customers to speak privately with somebody from their own institution about matters that cannot be dealt with at the shared counter.

The result is a physical banking service with two layers: everyday cash functions available throughout the

working week and bank-specific advice available only when the relevant institution is present.

That becomes clear when individual Scottish timetables are compared.

At Bathgate, Santander attends on Monday, Royal Bank of Scotland on Tuesday, Lloyds, Halifax and Bank of Scotland on Wednesday, TSB on Thursday and Barclays on Friday. At Banff, Bank of Scotland attends on Tuesday, Royal Bank of Scotland on Wednesday and TSB on Friday, with no community banker listed on Monday or Thursday.

Helensburgh's temporary hub lists Royal Bank of Scotland on Monday, Santander on Tuesday and Lloyds, Halifax and Bank of Scotland on Wednesday. The shared counter remains available on Thursday and Friday, but no individual community banker is listed for those days.

Other Scottish communities now operating hubs include Alexandria, Bo'ness, Brechin, Forres, Linlithgow, Auchterarder and Dunbar, while temporary premises are being used in some places as permanent sites are developed.

A customer can therefore regain a place in town where money can be deposited and withdrawn without regaining a conventional branch of his or her own bank.

## Scotland was part of the original experiment

Cambuslang was one of the first two communities in the UK to test the hub model, opening alongside Rochford in England at the end of April 2021. The pilot was created to examine whether a shared building could preserve access to physical banking after individual branches had gone.

Five years later, what began as an experiment has become infrastructure.

Cash Access UK said in April 2026 that 234 hubs had already been delivered across the UK and 276 recommended, with 101 new hubs opening during 2025 alone. It recorded an average of 167 transactions a day at hubs and said the network of hubs and other cash services was approaching one million customer transactions each month.

The expansion matters because the policy objective has changed from preserving every bank's individual branch estate to preserving reasonable access to cash after those branches close.

Since September 2024, the Financial Conduct Authority's access-to-cash regime has required designated banks and building societies to assess and address significant gaps in local cash provision. LINK carries out assessments when participating banks announce closures or when communities request a review.

If LINK concludes that additional provision is needed, the answer can be a banking hub, an ATM, a deposit service or another cash solution. It does not have to be a replacement conventional branch.

The regulatory framework therefore accepts the continued commercial closure of individual branches while seeking to protect access to essential cash services around the consequences.

## What has been restored and what has not

For businesses that handle cash, a hub can restore one of the most practical functions lost with a branch.

A shop, pub, café, hotel, market trader or community organisation cannot deposit physical takings through an app. Removing the final local bank can turn a routine end-of-day task into a journey, sometimes over

considerable distances in rural Scotland. A shared counter can bring that function back into the town.

For personal customers who do not use online banking, the hub also restores somewhere to withdraw money, pay in cash or cheques and carry out basic account activity with human assistance.

What it does not automatically restore is continuous access to the staff of an individual bank.

A traditional branch combined the counter, the bank's own employees and its wider advisory functions in one permanent institution. In a hub, the physical infrastructure remains but the individual banks rotate through it. A customer whose bank attends on Wednesday may have to return on Wednesday for a matter that requires that bank's representative.

That is neither evidence that the hubs have failed nor that they are equivalent to the system they replace. It is a different service design.

It also helps explain why raw counts can mislead. One new banking hub cannot simply be counted as one branch restored. A hub can serve customers of several banks at once and therefore replace some functions of multiple closed branches, while still offering less continuous bank-specific presence than any of those branches once provided.

## **The next measure is geography, not simply openings**

Modern Scot's August investigation found that Which? counted 751 closures from a Scottish baseline of 1,041 branches since 2015, while Modern Scot's own historical reconstruction had individually identified 714 closures at the time of publication. The work showed how rapidly the conventional network had contracted and how difficult some earlier closures were to reconstruct even a decade later.

The expanding hub system creates a new dataset that can now be measured against that lost geography.

The useful questions are no longer simply how many hubs have opened in Scotland, but which communities have received them, how long they waited after their final branch closed, how far customers would otherwise have had to travel and whether permanent premises were secured quickly after a temporary service began.

Those measurements matter particularly in rural and island Scotland. A ten-mile gap in an urban area and a ten-mile gap involving infrequent public transport, winter roads or a ferry are not equivalent forms of access.

The scheduled community-banker timetables add another measure: how often customers of each institution can obtain face-to-face bank-specific help without travelling elsewhere.

That is the second chapter of Scotland's bank-closure story.

The first was the disappearance of individual institutions from hundreds of high streets. The replacement is not a return to the old arrangement, but a shared network designed around common cash infrastructure and rotating access to the banks themselves.

For communities that had reached the point of having no bank at all, that can be a substantial restoration of service.

For Scotland as a whole, it marks something larger: the physical bank has not vanished completely. It is being rebuilt in a form in which the building is shared, the counter is common and the individual bank may be present only one day a week.

## Previous Article:

- Modern Scot — A Country Without Tellers: How Scotland Lost Its Banks, 13 August 2026. Read the earlier Modern Scot investigation.
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COMMUNITY | 30 September 2026

# Scotland's Wastewater-Drug Monitoring Decision Returns to View After Nitazenes Reach 247 Deaths

Read online: <https://modern.scot/scotlands-wastewater-drug-monitoring-decision-returns-to-view-after-nitazenes-reach-247-deaths/>



Scotland recorded 1,133 drug-use deaths in 2025, with nitazenes implicated in 247 and cocaine in 589. The figures do not show that wastewater surveillance would have prevented individual deaths, but they provide new context for the decision not to spend £20,675 restoring five Scottish monitoring sites.

Nitazenes were implicated in 247 drug-use deaths registered in Scotland during 2025, more than three times the previous year's total, as the country's

overall number of drug-use deaths rose to 1,133.

The new National Records of Scotland figures add a further layer to a decision reported by Modern Scot in August, when internal government records showed that Scotland had declined an opportunity to restore five wastewater sites used to monitor illicit-drug consumption for a further sampling cycle at a cost of £20,675.

In Scotland Declined £20,675 to Restore Five Drug-Wastewater Monitoring Sites, Modern Scot established that the Home Office had removed all eight Scottish sites from its Wastewater Analysis for Narcotics Detection programme after withdrawing funding. When money later became available for another sampling round, the Scottish Government was offered five sites back if it met the £20,675 cost. Officials described the amount as relatively small and affordable but recommended against paying it. Drugs and Alcohol Policy Minister Maree Todd accepted that recommendation.

The final 2025 mortality figures were not available when that decision was made. They now show a drug market in which synthetic opioids, cocaine and combinations of substances continue to alter the pattern of harm.

## The national figures changed sharply in 2025

National Records of Scotland recorded 1,133 drug-use deaths in 2025, an increase of 116, or 11 per cent, from 1,017 in 2024. The age-standardised mortality rate was 21.4 deaths per 100,000 people, compared with 19.1 the previous year.

The annual movement in the age-standardised rate should be treated carefully. National Records of Scotland said the confidence intervals around the figures overlap, meaning the year-to-year rate increase was not statistically significant on that measure.

The composition of the deaths nevertheless changed in ways that are important to drug surveillance.

An opiate or opioid was implicated in 881 deaths, equivalent to 78 per cent of the total. Cocaine was implicated in 589 deaths, or 52 per cent, the highest number recorded since the current series began in 2008.

That was 110 more cocaine-implicated deaths than in 2024.

Nitazenes were implicated in 247 deaths, representing 22 per cent of all drug-use deaths. Etonitazene alone was implicated in 215.

That increase cannot be read as a simple measure of how much nitazene use rose during the year. National Records of Scotland has warned that testing expanded during 2025. Etonitazene was added to routine post-mortem testing across Scotland in May, meaning some of the increase reflects a greater ability to detect the substance as well as changes in the illicit drug supply.

The wider pattern is one of extensive polydrug use. More than one drug was implicated in 78 per cent of drug-use deaths.

The average age of those who died was 46. The mortality rate for males remained around three times the rate for females, and people living in Scotland's most deprived areas continued to experience a dramatically higher death rate than those in the least deprived areas.

## **What wastewater surveillance could — and could not — have shown**

Wastewater surveillance operates at population level. It analyses untreated sewage for drugs and their metabolites and can identify changes in the chemical signal produced by communities served by a treatment works.

It does not identify individual users. It cannot tell public-health teams who took a substance, the dose consumed by a particular person or whether an individual is in immediate danger. Nor can the 2025 death statistics be used retrospectively to show that keeping the five Scottish sites would have prevented any specific death.

The policy question is narrower.

Wastewater monitoring can add another source of intelligence to systems that already use toxicology, drug seizures, emergency-department information, treatment data, alerts from frontline services and direct drug testing. Because the samples are collected from populations rather than from people who voluntarily present to a service, wastewater can reveal broad changes in consumption without depending on individual contact with health or justice agencies.

The Home Office WAND programme had operated since 2021. Scotland originally had eight monitoring locations within the UK programme before the funding change removed them.

When the five-site restoration was offered, Scottish Government officials acknowledged that another cycle would provide further information about drug-consumption patterns and the future potential of wastewater surveillance. They nevertheless concluded that the additional value did not justify taking over the funding.

A Scottish Government Freedom of Information response published in August said it was not then undertaking, supporting, funding or considering wastewater monitoring relating to illicit drugs or psychoactive substances and was unaware of another current Scottish programme doing so.

## **Scotland is expanding a different kind of drug intelligence**

The absence of wastewater monitoring does not mean Scotland has abandoned drug surveillance.

Public Health Scotland's Rapid Action Drug Alerts and Response system brings together information from

toxicology, emergency departments, police and other sources. Scotland is also moving into direct drug checking.

The first local drug-checking service is due to open in Glasgow on 5 October. The Scottish Government says more than £1.7 million has been invested in the development of drug-checking services, with Aberdeen and Dundee also licensed and Edinburgh preparing an application.

The Glasgow service will allow eligible people to submit a small sample of an illicit drug for analysis, with the results feeding both individual harm-reduction advice and wider intelligence about the substances circulating in Scotland. Samples are to be tested through a national laboratory at the University of Dundee.

Its reach is constrained by the Home Office licence under which the service operates. The Scottish Government says the licence limits access to adults aged over 18 who are dependent on one or more illicit drugs.

Drug checking and wastewater surveillance therefore answer different questions. One analyses a particular sample brought into a service and can tell the person using it what has been found. The other looks for chemical evidence across a large population regardless of whether individual users have made contact with a service.

Neither replaces post-mortem toxicology or the other systems used to understand Scotland's drug deaths.

## **The £20,675 decision was made before the full mortality picture**

The importance of the new figures is not that they overturn the Government's earlier assessment automatically. They do not.

The decision not to fund the five WAND sites was taken against the evidence available at the time. The Government concluded that Scotland's existing surveillance arrangements meant the wastewater programme would not add sufficient value.

What has changed is the evidence against which that conclusion can now be reviewed.

Scotland now knows that 1,133 people died from drug use in 2025; that cocaine was implicated in more than half of those deaths; that nitazenes were detected in more than one in five; and that combinations of drugs were implicated in more than three-quarters.

Those figures do not demonstrate that wastewater monitoring would have provided an earlier warning about every substance involved. The detection of emerging synthetic drugs depends on laboratory methods, the compounds being tested for and the sampling design. Nor do they show what intervention would have followed had a change been observed.

They do show that the market the surveillance system is trying to understand is not static.

Scotland is now expanding direct drug checking while continuing to rely on RADAR and other intelligence systems. The five wastewater sites offered for £20,675 were not restored.

The question created by the 2025 figures is therefore a practical one for the next stage of policy: whether the mix of surveillance Scotland has chosen remains sufficient for a drug supply in which rapidly changing synthetic opioids, record cocaine involvement and polydrug use are appearing in the same mortality statistics.

## Sources

- National Records of Scotland — Drug-related deaths in Scotland, 2025, 23 September 2026. Read the national statistics.
  - Scottish Government — Information relating to wastewater monitoring for illicit drugs in Scotland: FOI release, 13 August 2026. Read the FOI release and disclosed records.
  - Scottish Government — Drug checking service, 23 September 2026. Read the announcement.
  - Modern Scot — Scotland Declined £20,675 to Restore Five Drug-Wastewater Monitoring Sites, 20 August 2026. Read the earlier Modern Scot investigation.
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ECONOMY | 30 September 2026

# Great British Energy Had No Direct Employees in March. By September It Had 55

Read online: <https://modern.scot/great-british-energy-had-no-direct-employees-in-march-by-september-it-had-55/>



The public company's first annual accounts and later parliamentary answers show the transition taking place behind its Aberdeen headquarters: a workforce initially assembled entirely from civil servants, secondees and contractors is beginning to become a directly employed organisation.

Great British Energy had 121 people in its workforce at the end of March 2026 but did not directly employ any of them, according to its first annual report and accounts. By early September, a later UK Government

answer put the workforce at 132 and said 55 were permanent employees of the company.

The two snapshots, separated by little more than five months, provide the clearest account yet of how the publicly owned energy company is moving from its start-up structure into a permanent organisation headquartered in Aberdeen.

Modern Scot reported on 21 August, in *More Than A Third Of Great British Energy Staff Live Outside Scotland Despite Aberdeen Headquarters*, on the geographical distribution of the workforce and the number of people then living outside Scotland. The newly published annual accounts answer a different question: what kind of workforce Great British Energy had built by the end of its first reporting period, before much of its permanent recruitment had taken place.

The dates are important. The March accounts should not be treated as contradicting the later August and September workforce figures. They show the organisation at an earlier stage, when staff had largely been supplied by government departments, other organisations and contractors.

## The March workforce was entirely borrowed, seconded or contracted

At 31 March, Great British Energy recorded a total workforce headcount of 121.

Of those, 24 were employed by the Department for Energy Security and Net Zero on Great British Energy's behalf. Another 73 were on loan from DESNZ or other parts of the Civil Service. Six were secondees and 18 were contractors.

The company stated explicitly that it had no directly employed staff at that date.

That position affected even the disclosures normally expected in an annual report. Great British Energy said it had not yet approved its own pay and reward framework during the period and therefore did not have employees working under Great British Energy terms and conditions for the purposes of its fair-pay reporting. It said it expected those disclosures to begin in its 2026–27 annual report.

The accounts recorded £7.9 million in staff costs. They also show £3.8 million in professional-services expenditure, described as consultancy services, during the reporting period.

At 31 March, 18 off-payroll engagements earning more than £245 a day were in place, all of them for less than a year. Across the reporting period, the company recorded 27 temporary off-payroll workers; 26 were assessed as falling within the off-payroll working rules and one outside them.

None of those figures is unusual evidence by itself of misconduct or excessive staffing. New public bodies are often created using staff loaned from departments, secondees and specialist contractors while permanent recruitment, governance and systems are established. What the accounts provide is an audited baseline for the scale of that dependence in Great British Energy's first year.

## **By September, 55 people were directly employed**

A written parliamentary answer published on 8 September shows how quickly the composition changed.

The UK Government said Great British Energy then had 132 staff: 55 permanent employees, 31 contractors and 46 secondees.

That means direct employment had moved from zero at the end of March to 55 by the time of the September answer, while the overall workforce had increased by 11.

The later figures also provide more detail about the seconded workforce. Of the 46 secondees, two were based in Aberdeen, ten elsewhere in Scotland and 34 elsewhere in the United Kingdom. The Government said the majority came from DESNZ, with others supplied by the Scottish Government, Ofgem, the Government Legal Service, the Department for Education, ORE Catapult, Baringa, CO2 Sense and Xodus.

That distribution should not be confused with the location of the entire Great British Energy workforce. It applies specifically to the 46 secondees covered by the parliamentary answer.

Nor does the Government maintain a central record of employees' home addresses. In a separate answer, it said Great British Energy had no fixed organisation-wide requirement for a particular number of office days and that working arrangements were agreed individually, with hybrid working used where appropriate.

Those details explain part of the difficulty in measuring what an Aberdeen headquarters means in employment terms. The company can be headquartered in Aberdeen while maintaining employees, secondees and contractors elsewhere in Scotland and the wider UK. The more useful measurements are therefore the number of jobs principally based in Aberdeen, the number of directly employed staff attached to the headquarters and how those figures change as temporary arrangements are replaced.

## **The permanent headquarters opened after the accounts closed**

The March accounts also pre-date the formal opening of Great British Energy's permanent headquarters at Marischal Square.

The accounts show that a 12-year lease for the Aberdeen headquarters began in February 2026. They record a right-of-use asset and corresponding lease liability of approximately £2.6 million.

Great British Energy formally marked the opening of the headquarters on 22 September. At the same time, it announced £750,000 for a north-east Scotland partnership intended to support energy skills, training and employability, and said it would aim for 5 per cent of its own workforce to be in entry-level and early-career pathways.

The sequence matters. At the end of March, the company had secured its headquarters lease but had no directly employed staff. By September, the headquarters had opened and the company said it had 55 permanent employees.

The accounts therefore capture the organisation before the transition that many people in Aberdeen will ultimately use to judge the headquarters: whether a public company created with a stated connection to the city builds a substantial permanent workforce there rather than simply locating its registered centre in Aberdeen.

## **A £14.1 million first-period loss reflects the set-up phase**

Great British Energy reported a £14.1 million loss for its first accounting period, with operating expenses of approximately £14.2 million. The figure should be read in the context of a company being established rather than as the trading loss of a mature energy producer.

Great British Energy was incorporated in October 2024 and received its statutory footing when the Great British Energy Act received Royal Assent in May 2025. Costs incurred before Royal Assent remained with DESNZ rather than being included in the company's financial statements.

The first accounts therefore cover the creation of governance, finance, staffing and operational systems as well as the beginning of the company's investment activity.

For Aberdeen, the staffing figures are the more revealing part of the document because they establish how much of the early company existed through arrangements with other institutions.

The Government had already said earlier in 2026 that the majority of permanent Great British Energy roles were expected to be based in Aberdeen and that the company expected to create hundreds of jobs there over its first five years. The March accounts show how far there still was to travel at the end of the first reporting period.

## **The next accounts will be the first test of the permanent organisation**

The 2026–27 annual report should look fundamentally different from the first.

It should contain the company's first full-year disclosures for directly employed staff, its pay framework, a larger permanent workforce and a longer period in which the Marischal Square headquarters has been operating.

It will also allow a cleaner comparison between the people who work directly for Great British Energy and those supplied by departments, consultancies and other organisations.

For now, the available records show a transition rather than a settled workforce.

At 31 March, Great British Energy had 121 people and none was directly employed by the company. By September, the workforce had risen to 132 and 55 were permanent employees. Between those two dates, the Aberdeen headquarters moved from a lease in the accounts to an operating office.

Modern Scot's earlier reporting established that a substantial part of the wider workforce remained outside Scotland. The next question is now more precise: as Great British Energy converts a start-up organisation into a permanent company, how many of the jobs that replace the borrowed, seconded and contracted workforce will actually be rooted in Aberdeen and the north-east?

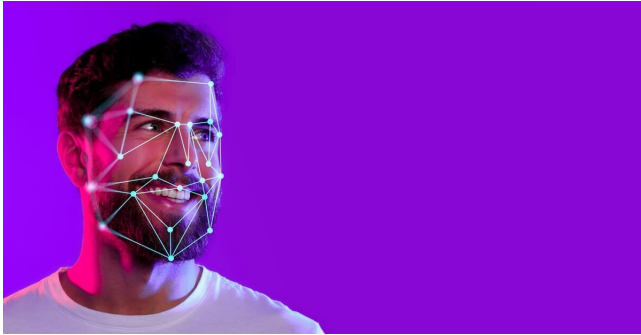
## Sources

- Great British Energy — Annual Report and Accounts 2025 to 2026, published 14 September 2026. UK Government publication page.
  - UK Parliament — Written question 24781, answered 8 September 2026, on Great British Energy staffing and secondees. Read the parliamentary answer.
  - UK Parliament — Written question 21021, answered 8 September 2026, on staff location and working arrangements. Read the parliamentary answer.
  - Great British Energy — Great British Energy opens its doors in Aberdeen as it promises a lasting legacy for generations of energy workers, 22 September 2026. Read the announcement.
  - Modern Scot — More Than A Third Of Great British Energy Staff Live Outside Scotland Despite Aberdeen Headquarters, 21 August 2026. Modern Scot Aberdeen City archive.
-

POLICY AND GOVERNMENT | 30 September 2026

# Scotland's Digital ID: ScotAccount Uses Experian, Cifas and Biometric Checks

Read online: <https://modern.scot/scotlands-digital-id-scotaccount-uses-experian-cifas-and-biometric-checks/>



The Scottish Government opposes a mandatory UK digital identity scheme. At the same time, Scotland already operates its own reusable digital identity service. For people asked to verify who they are, a passport can be only one part of a wider chain involving Experian credit-record checks, Cifas fraud screening, biometric facial comparison, cloud infrastructure and a unique identifier designed to work across public

services.

Scotland does not need to wait for a future UK digital identity programme to discover what a government digital ID looks like. One is now operating.

ScotAccount's own terms describe it as the name for the "individual digital identity services provided by the Scottish Government". The Scottish Government says the system allows people to sign in to multiple public services, verify their identity and, if they choose, save verified information such as their name, date of birth and address so that it can be reused when another participating service needs it.

Modern Scot previously examined the system in ScotAccount Brings Digital Identity Into Scotland's Property Ownership System, when the same identity layer began appearing inside another part of Scotland's public infrastructure. The Government's newer documents, privacy notices, contracts and freedom-of-information responses now allow a clearer examination of what sits behind that account.

The question is not whether ScotAccount is a digital ID. The Scottish Government's own documentation answers that question. The issue is what happens when a citizen uses that identity to enter a public service, who participates in establishing that identity, what information is checked beyond an official document, how long parts of the resulting data trail remain, and how the system is intended to expand across government.

## A passport is not necessarily the end of the identity check

ScotAccount allows identity verification using an official document such as a passport, but the document is not necessarily the only source against which the person is checked.

The current ScotAccount privacy notice says that all users who are required to verify their identity are also subject to separate activity-history and fraud checks.

For an official-document route, ScotAccount uses Experian and Experian's subcontractor Mitek. The process can involve a photograph of the identity document and a photograph of the user. Mitek is used for document checks and for biometric "likeness" and "liveness" checks intended to establish that the document is genuine, that a real person is present and that the person matches the photograph on the document.

ScotAccount may also send a person's name, date of birth and passport number to HM Passport Office so that the passport can be checked against government records. HM Passport Office returns the result of that check.

Those are recognisable identity-verification steps. A passport is being checked against the authority that issued it and the person presenting it is being compared with the photograph it carries.

But ScotAccount then performs an additional check through Experian.

The privacy notice calls this an "activity history check". Experian conducts a soft search of the person's credit record to determine whether the identity has existed over time. ScotAccount says Experian uses information from sources including the electoral register and financial institutions and checks whether the information supplied by the person matches those sources.

The Scottish Government says it does not receive the underlying credit information. Experian returns a pass or fail result. The search does not affect the person's credit score.

That boundary is important. ScotAccount is not receiving a citizen's bank transactions, and using ScotAccount does not mean a bank account is being connected to the Scottish Government.

It does mean that, for a person required to verify their identity, the verification process can extend beyond a state-issued passport and into records held by a commercial credit-reference agency, including records derived from financial institutions.

## **When identity is proved through questions, financial history moves closer to the centre**

ScotAccount also offers a route for people who do not have suitable photographic identification or cannot use the photographic process.

That route uses knowledge-based verification. A person can be asked questions drawn from information about their bank accounts, mortgages, loans, credit cards or other personal history. ScotAccount sends the person's name, date of birth and address to Experian, which generates the questions from information it already holds. The answers are returned to Experian for checking.

Again, the Scottish Government says it does not see the person's underlying financial records, transactions, questions or answers. It receives a pass or fail outcome.

Experian occupies a different legal position during this part of the process. For document verification it can act as a processor operating under Scottish Government instructions. For the knowledge-based verification and activity-history checks, the current privacy notice describes Experian as an independent data controller. It can retain some information for fraud and error prevention and to meet its own legal and regulatory requirements.

The public-facing transaction may look like one government identity check while, behind it, different organisations are processing different parts of the evidence under different legal roles.

## **Cifas adds a separate fraud database**

Experian is not the only external organisation involved.

ScotAccount also checks identifying information against Cifas, the UK fraud-prevention service. According to

the Scottish Government's privacy notice, the purpose is to determine whether an identity is at higher-than-usual risk of fraud, has been stolen or misused, or appears to be synthetic.

Cifas sends ScotAccount a result stating whether fraud is known or suspected in connection with the identity and can provide details of associated fraudulent activity.

This is separate from checking whether a passport is genuine. It is a second question: not simply whether the document is valid, but whether the identity appears in information used for fraud prevention.

ScotAccount's legal basis for managing accounts, verifying identity and conducting fraud monitoring is not consent. The Scottish Government says the processing is necessary for a task carried out in the public interest under Article 6(1)(e) of UK GDPR. It relies on substantial-public-interest provisions for biometric processing connected with identity checking and fraud prevention.

Consent enters at a different stage. Users can choose whether to save their successfully verified information in ScotAccount so that it can be reused later. The Government says refusing to save those verified attributes does not prevent the person using ScotAccount or the online service they are accessing.

It can be easy to miss. A user can choose whether to retain a reusable bundle of verified information. The underlying account, identity and fraud processing needed to run the verification service itself is performed under the Government's public-task basis.

## One identity, increasingly many services

ScotAccount is designed to be reusable.

When an account is created, the user is assigned a randomised unique account identifier. The identifier is shared with services when the person signs in. Where a participating service requires verified identity, ScotAccount can also provide the verification result and verified information including the person's name, date of birth and address after the user confirms the information to be shared.

The Government's service documentation describes the purpose plainly: public bodies should not need to build their own separate identity-checking systems, and citizens should not have to prove the same identity repeatedly. By June 2026, the Scottish Government said ScotAccount had more than 768,000 registered accounts.

The system has already been used for services including Disclosure Scotland applications, the Crown Office and Procurator Fiscal Service Witness Gateway, insolvency and debt services, tobacco and vaping registration, funeral-sector registration and the Register of Assignations and Statutory Pledges.

The Government is deliberately widening that reach.

Its 2026–31 Programme for Government commits to digital services built around a “tell us once” approach, shared data definitions and datasets, a ScotGov App intended to give citizens access to multiple services without separate websites and logins, and accelerated development of Data Exchange so that data held by one organisation can be made available to another while, the Government says, protecting privacy and security.

ScotAccount sits among the common components being assembled for that model alongside Digital Mailbox, ScotPayments and ePass.

This does not mean Scotland currently has a single database in which every piece of information held by every public body has been merged. The published evidence does not establish that.

It does establish something more specific: Scotland has built a persistent, reusable digital identity layer intended to operate across an expanding number of public services, while the Government is simultaneously developing the infrastructure for greater sharing and reuse of public-sector data.

## **What can be shared when fraud is suspected**

The ordinary sharing described by ScotAccount is relatively narrow. A service can receive the account identifier and, where requested and confirmed by the user, contact information and verified identity attributes.

The privacy notice contains a broader provision for crime and fraud.

For those purposes, ScotAccount says information can sometimes be shared with the agencies and departments running services accessed through ScotAccount, other UK public-sector organisations including the Home Office, law-enforcement bodies including Police Scotland and the National Crime Agency, Experian and relevant monitoring providers.

## **The categories listed include IP addresses and geolocation, the ScotAccount number, device information, identity-document details, names and dates of birth, addresses, phone numbers and email addresses.**

That does not mean all of those data are routinely sent to all of those bodies whenever someone signs in. The privacy notice describes sharing for identifying crime and protecting against fraud.

But it demonstrates that the identity layer is not limited to a one-time comparison between a person and a passport. It produces account, device, verification and security information which sits within a wider counter-fraud framework.

## **A seven-year audit trail**

Different parts of ScotAccount are retained for different periods.

The Scottish Government says biometric data used during identity verification are kept until verification is complete, normally only for minutes but potentially for up to one week. It says the questions and answers used for knowledge-based verification are not retained by ScotAccount.

Ordinary system logs recording actions taken in ScotAccount are kept for 12 months. Security-monitoring data are kept for six months.

Separately, ScotAccount maintains a secure audit trail of its audit logs for seven years for fraud-monitoring purposes.

A user can delete information they have chosen to save and can delete the ScotAccount itself. The privacy notice also makes clear that data held by other organisations involved in the verification process can be governed by those organisations' own legal responsibilities and retention requirements.

The system therefore cannot be understood simply by looking at the contents visible inside a citizen's ScotAccount. Part of the processing exists in records maintained by separate organisations involved in establishing and protecting the identity.

## The Experian contract is worth £2.68 million

The commercial identity-checking role is not incidental.

In March 2025 the Scottish Government published a contract award for the renewal of Experian digital-identity services with a value of £2,680,647 excluding VAT. The contract notice describes the procurement as part of the Digital Identity Scotland programme.

Experian Limited, the contracted UK entity, is based in Nottingham. The wider Experian group is incorporated in Jersey and headquartered in Dublin, with a substantial international business.

The relevant reporting point is therefore not that ScotAccount hands a citizen's banking account to an American company. The documents do not support that statement.

The stronger documented fact is that Scotland's government digital identity system depends in part on a commercial credit-reference organisation to test the history and credibility of an identity, including by carrying out a soft search of records assembled from sources that include financial institutions.

## Its cloud host is subject to United States jurisdiction

A separate international-jurisdiction issue exists in the infrastructure underneath ScotAccount.

In a freedom-of-information response published in July, the Scottish Government confirmed that ScotAccount is hosted on Amazon Web Services in UK regions and that ScotAccount data are processed and stored within the UK.

The Government also expressly confirmed that AWS is subject to United States jurisdiction.

The same FOI request asked whether ScotAccount's Data Protection Impact Assessment specifically examined the risk of extraterritorial data access under the US CLOUD Act or the UK-US Data Access Agreement. The Scottish Government said it did not.

## Scotland opposes a mandatory UK digital ID, while pushing Scots into its own

The contrast becomes sharper when ScotAccount is placed beside the UK Government's developing digital-identity policy.

In an FOI response published in August, the Scottish Government said it had been clear in its opposition to a mandatory UK digital identity scheme, citing concerns about inclusion, proportionality, privacy and non-discrimination.

That position is not inconsistent with operating any form of digital identity. A government can oppose a mandatory national scheme while supporting a voluntary or service-specific digital identity system.

The technical similarities already visible.

GOV.UK One Login is also designed to let people prove their identity once and reuse that verified identity across government services. It too uses Experian. Its identity process can include financial-history questions about bank accounts, mortgages, loans and credit arrangements, as well as fraud checking, document verification and facial comparison.

The systems are not identical. Their governance, scope, legal arrangements and degree of compulsion differ.

Scotland continues to say that offline routes should remain available to people who cannot or do not wish to use digital services.

ScotAccount is a digital identity service by the Scottish Government's own definition.

## **ScotAccount and GOV.UK One Login are already being discussed together**

The two systems are not presently connected through the proposed UK national digital-ID infrastructure. The Scottish Government says there are currently no plans to make that connection.

However, it has also confirmed continuing work with the UK Government on possible “interoperability and federation of credentials” between ScotAccount and the existing GOV.UK One Login system.

In a further FOI response, the Scottish Government explained that interoperability could mean one digital identity system recognising or accepting credentials issued by another, while federation could allow a person to authenticate across systems without creating separate accounts.

Six meetings specifically concerning ScotAccount and GOV.UK One Login interoperability or credential federation took place between August 2023 and June 2025. The Government says they remained exploratory and produced no formal agreement, detailed design or agreed data flows.

As of the April 2026 FOI request, no Data Protection Impact Assessment, data-sharing agreement, privacy notice or formal interoperability document had been produced for connecting the two systems, because the work had not progressed that far.

That is an important boundary. There is no evidence that ScotAccount data are currently being merged into GOV.UK One Login.

There is evidence that the two governments have been exploring whether credentials issued in one system could eventually be recognised by the other.

## **The question is no longer whether Scotland has digital identity**

The debate over digital identity can easily become trapped between two inaccurate descriptions.

One presents ScotAccount as little more than a convenient username and password. The Scottish Government's own documentation does not support that description.

The other assumes that every database has already been secretly merged, that government receives citizens' bank transactions or that foreign authorities have already accessed Scottish identity records. The available evidence does not support those claims either.

The documented system is substantial enough without either exaggeration.

A citizen can create a persistent Scottish Government account. Where identity verification is required, a passport or other document can be checked, the person's face can be biometrically compared with the document, Experian can search the person's credit record for evidence that the identity has existed over time, Cifas can be consulted for fraud indicators, and a unique identifier can then follow the verified account into participating public services. Parts of the resulting audit record are retained for years. The service is hosted on infrastructure operated by a company subject to US jurisdiction. The Government is simultaneously expanding “tell us once”, shared-data and common-service infrastructure.

None of those elements is hidden. They are spread across privacy notices, technical guidance, procurement records, policy papers and freedom-of-information responses.

Taken together, they describe something much larger than a login page.

They describe Scotland's digital identity infrastructure.

## The unanswered public-service question

The Scottish Government's case for the system is that reusable identity reduces duplication, prevents fraud, allows public bodies to avoid building multiple verification systems and makes services quicker for citizens. Its published principles emphasise data minimisation, user control and continued offline access.

The countervailing governance question arises from the same architecture.

When a citizen already possesses a government-issued passport, why is it necessary in some online verification journeys to supplement that official identity with an activity-history search through a commercial credit-reference agency and a separate check against a fraud-prevention database?

The answer may be that a genuine passport establishes the validity of a document but does not, by itself, eliminate impersonation, stolen identities, synthetic identities or other forms of fraud. That is the rationale built into the Government's current system.

But as ScotAccount moves from individual services towards a common route into public administration, the proportionality of each additional check becomes more important, not less. So does the distinction between data required to establish identity, data used to assess fraud risk, data saved for convenience and data made reusable across government.

The Programme for Government now proposes a ScotGov App, "tell us once" services and a Data Exchange intended to make information held by one organisation available to others. ScotAccount already provides the persistent identity capable of connecting a person to those services.

That makes digital identity a present question for Scotland, not a future one.

The system already exists. The next question is how far it will be allowed to reach.

## Sources

Privacy notice — ScotAccount — mygov.scot / Scottish Government, last updated 24 June 2026.

ScotAccount Terms of Use — Scottish Government, accessed 30 September 2026.

Verifying your identity with ScotAccount — mygov.scot / Scottish Government, accessed 30 September 2026.

ScotAccount: equality impact assessment — Scottish Government, 5 March 2026.

ScotAccount hosting infrastructure and jurisdictional risk assessment: FOI release — Scottish Government, 21 July 2026.

Digital identity scheme consultation queries: FOI release — Scottish Government, 19 August 2026.

Queries concerning interoperability between ScotAccount and GOV.UK One Login: FOI release — Scottish Government, 25 August 2026.

Programme for Government 2026 to 2031 — Delivering a stronger NHS and Public Services — Scottish Government, 1 September 2026.

Building joined-up digital public services in Scotland — Scottish Government Digital Directorate, 18 June 2026.

DIG — Digital Identity Experian Renewal, Contract Award Notice — Public Contracts Scotland / Scottish Government, 10 March 2025.

GOV.UK One Login: privacy notice — Government Digital Service, updated 28 January 2026.

Proving your identity with GOV.UK One Login by answering security questions — Government Digital Service, updated 22 September 2026.

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HIGHLAND | 30 September 2026

# Highland Sends Two More Short-Term Let Control Areas to Scottish Ministers

Read online: <https://modern.scot/highland-sends-two-more-short-term-let-control-areas-to-scottish-ministers/>



Councillors have approved proposals covering Inverness and a broad sweep of the rural Highlands. If ministers agree, future conversions of homes to secondary short-term lets in the designated areas would automatically require planning permission.

Highland Council has approved two new short-term let control area proposals and will now ask Scottish Ministers to designate them, moving a large part of the region one stage closer to additional planning

controls over homes converted for use as holiday accommodation.

The decision was taken by the council's Economy and Infrastructure Committee on 28 September. One proposed control area covers Inverness and surrounding areas. The second would cover Aird and Loch Ness, Inverness South, Wester Ross, Strathpeffer and Lochalsh, Lochaber, Skye and Raasay, and Sutherland.

Modern Scot reported on 23 September, in *Highland Short-Term Let Control Areas Move Towards a Decision*, that the council was approaching the point at which it would decide whether to submit both schemes to ministers. That decision has now been taken. The proposals are no longer simply consultation exercises within Highland Council; their next stage lies with the Scottish Government.

Short-term let control area does not create another licensing scheme. Scotland already has a national licensing system for short-term lets. A control area changes the planning position for certain properties, particularly homes that are converted into secondary short-term lets where the host does not normally live.

## What the designation would change

Within a designated control area, the use of a dwellinghouse as a secondary short-term let is treated in planning law as a material change of use. That means planning permission is required when a home is moved into that use after the control area takes effect.

Outside a control area, councils can still decide that a particular change from residential use to short-term letting amounts to a material change of use, but that judgment is ordinarily made on the circumstances of the individual property. Inside a control area, the planning position is clearer: the relevant change to secondary short-term letting is automatically brought within the planning system.

The measure is not retrospective. Existing secondary short-term lets do not automatically become unlawful merely because a control area is later designated. That does not mean every existing property is guaranteed to have lawful planning status. A council can still examine whether an earlier change of use required permission under the planning law that applied at the time, and operators can still need to establish lawful existing use where the position is disputed.

Home sharing and home letting are also distinct from secondary letting. A resident who lets a room in the home in which they live, or temporarily lets their own home while absent, is not automatically put into the same planning category simply because the property is within a control area. The council can nevertheless consider whether the particular scale and character of an operation amounts to a material change of use.

The result is a planning filter rather than a prohibition. If ministers approve the Highland proposals, a future owner seeking to turn a residential property into a secondary short-term let in the designated area would have to make a planning application. The local authority would then decide that application under the development plan and other material planning considerations.

## More than 800 responses

Highland Council held a six-week statutory consultation during May and June. It says more than 800 responses were received from residents, businesses, community organisations and short-term let operators.

According to the council's published account, 84 per cent of residents and businesses who responded supported the proposed Inverness City control area, while 72 per cent supported the Highland Rural proposal. Those percentages describe the people and organisations who participated in the consultation; they are not measures of opinion across the population of the proposed control areas as a whole.

The geographical scale of the rural proposal is one of the most consequential aspects of the decision. It would not apply to a single resort or concentrated tourism district. It would reach across communities with very different housing markets, from parts of the Inverness hinterland to Wester Ross, Lochaber, Skye and Raasay and Sutherland.

In some of those areas, the interaction between the permanent housing stock, second homes, holiday accommodation, local employment and seasonal visitor demand has become an increasingly important part of local housing policy. A control area does not determine how many short-term lets a community should contain, but it gives the planning authority a direct decision over future changes of residential property into secondary letting.

The scale of the existing short-term let sector is also significant. Scottish Government licensing statistics to 31 December 2025 recorded 8,284 short-term let licences in operation in Highland, by far the largest number of any Scottish local authority. Licensing data do not show how many of those properties would fall within the two proposed control areas, nor do they equate directly to homes removed from permanent residential use: licences include different types of short-term letting, including home sharing and home letting.

They do, however, show why the planning decision has consequences beyond a small number of properties.

## Highland already has one control area

The Highlands are not entering the policy for the first time. Badenoch and Strathspey became a short-term let control area on 4 March 2024 after Scottish Ministers approved Highland Council's earlier proposal.

Edinburgh became Scotland's first designated short-term let control area in September 2022. If the two new Highland proposals are approved, they would extend the policy across a much wider area of the country and place several of Scotland's most intensively visited rural and island communities within the same planning framework.

That does not mean the eventual planning decisions will be uniform. Planning applications remain applications.

The designation establishes that permission must be sought; it does not predetermine whether individual proposals should be approved or refused.

The council will also have to administer the relationship between planning and licensing. A short-term let licence concerns whether an operator meets the requirements of the licensing scheme. Planning permission concerns the lawful use of land and buildings. Obtaining one does not automatically provide the other.

That separation has sometimes been obscured in the public debate because both systems apply to the same businesses and properties. The proposed control areas make the distinction more important: an operator may satisfy licensing requirements but still need planning permission for the use of the property.

## The decision now belongs to ministers

The committee's vote does not bring either control area into force immediately.

Highland Council must now submit the proposals to Scottish Ministers. The Government will consider whether each area should be designated. The council has said officers will report back following the ministerial decision, including on implementation arrangements and the date on which any approved control area would begin operating.

That commencement date will become the practical dividing line for future changes of use. A qualifying conversion from a dwellinghouse to a secondary short-term let after designation would automatically require planning permission. Existing uses would remain subject to the planning circumstances that already apply to them.

The next questions are therefore no longer whether Highland councillors support submitting the proposals, or what boundaries they intend to put forward. Both are now known.

The unresolved questions sit in Edinburgh: whether Scottish Ministers will approve both areas as submitted, whether either boundary will be changed, and when any approved designation will take effect.

For a region that already accounts for more short-term let licences than any other council area in Scotland, those decisions will determine how much of the future conversion of ordinary homes into secondary visitor accommodation must first pass through the planning system.

## Sources

- Highland Council — Highland Council agrees to submit Short Term Let Control Area proposals to Scottish Ministers, 28 September 2026. Read the council announcement.
- Highland Council — Economy and Infrastructure Committee, 28 September 2026. Meeting record.
- Scottish Government — Planning Circular 1/2023: Short-term lets and planning, 17 May 2023. Read the circular.
- Scottish Government — Short-term lets licensing statistics: Scotland to 31 December 2025. Local-area licence statistics.
- Highland Council — Short Term Let Control Areas: Badenoch and Strathspey. Current Highland control area.
- Modern Scot — Highland Short-Term Let Control Areas Move Towards a Decision, 23 September 2026. Modern Scot.

ENERGY | 28 September 2026

# Scotland Has a 32.8GW Battery Pipeline as Ofgem Proposes a Financial Test for Grid Places

Read online: <https://modern.scot/scotland-has-a-32-8gw-battery-pipeline-as-ofgem-proposes-a-financial-test-for-grid-places/>



Scotland has accumulated 32.8 gigawatts of proposed battery-storage capacity in its planning pipeline, making batteries the largest single technology awaiting development in the country's renewable-energy system.

Most of those batteries do not yet exist.

Some have planning permission, some remain applications, some have secured places in the

electricity-grid connection system and others may never be built. Against that background, Britain's energy regulator is considering a new financial requirement intended to force developers to decide earlier which battery projects they are actually prepared to finance.

Ofgem opened a consultation on 17 September on an Oversubscribed Technologies Commitment Fee, known within the electricity industry as CMP470. It is currently minded to approve the proposal, but no final decision has been made and the consultation remains open until 1 October.

The proposed mechanism begins with a relatively simple problem. Britain now has far more battery projects holding prospective grid connections than its current energy plans expect the country to need.

Approximately 7GW of battery storage is already operating across Great Britain. Another 83GW has reached what the reformed connection system calls Gate 2.

Gate 2 does not mean that a battery has been built. It means the project has passed far enough through the new grid process to have, or qualify for, a firmer offer identifying where and when it could connect to the electricity network.

Together, the operating and Gate 2 projects amount to about 90GW.

The current national planning range is 23GW to 27GW of battery storage by 2030 and 24GW to 29GW by 2035.

Ofgem is therefore dealing with a queue containing roughly three times the battery capacity at the upper end of what the system is presently expected to require.

## Scotland's Battery Pipeline Is Much Larger Than Its Existing Fleet

The Scottish figures illustrate the difference between what is proposed and what is actually operating.

At the end of March 2026, Scotland had 1,583MW of electricity-storage capacity in operation. Of that, 843MW came from 22 battery projects and 740MW from Scotland's two pumped-storage hydro schemes.

The planning pipeline was on another scale.

Scottish Government statistics recorded 32.8GW of battery projects at various stages of the planning process, within a wider 41.8GW electricity-storage pipeline.

Battery storage alone therefore represented more proposed capacity than either onshore wind, at 18.7GW, or offshore wind, at 17.3GW.

Those figures cannot be compared directly with Ofgem's 83GW Gate 2 figure. The Scottish number comes from the planning system; the Ofgem number comes from the grid-connections system. A project can appear in one before reaching the equivalent stage in the other.

They nevertheless describe the same development boom from different directions: developers have been pursuing considerably more battery capacity than is likely to reach construction under the present energy pathway.

### Why So Many Batteries Reached the Grid Queue

Britain has already attempted to clear its electricity-connections backlog.

For years, projects largely entered the queue according to when they applied. As applications multiplied, hundreds of gigawatts of wind, solar, batteries and other developments accumulated connection dates extending many years into the future.

The replacement system was intended to prioritise projects that were both sufficiently developed and considered necessary for the future electricity system.

Existing projects complicated the transition.

When the reforms were introduced, protection was given to developments that had already made substantial progress. Depending on their circumstances, that could include projects with planning progress, commitments under electricity-market arrangements or relatively near connection dates.

Battery developments were particularly well placed to satisfy some of those tests because they can often progress through planning more quickly than large generating projects.

The result was that the protections admitted considerably more battery capacity to Gate 2 than the national capacity pathway required.

Ofgem's impact assessment records that 58 per cent of battery capacity within the relevant population has either not yet reached the point at which substantial cancellation liabilities begin or otherwise carries no significant securities or liabilities. Only 16 per cent has both passed that point and obtained planning consent.

The regulator's concern is therefore not simply that the queue is large. It is that some developers can retain valuable future connection positions for several years while committing comparatively little money to them.

### The Proposed Test Is Financial

CMP470 would not ask regulators to determine which battery design is technically best or which site would be most useful to Scotland.

Instead, it would increase the financial commitment required to continue holding a grid position when a technology becomes heavily oversubscribed.

The proposal would establish a minimum level of financial security or cancellation liability beginning at £3,000

for every megawatt of project capacity.

If excessive capacity remained in the queue, the minimum could rise first to £5,000 per MW and then in £5,000 steps at subsequent six-month reviews, reaching a maximum of £25,000 per MW.

A 100MW battery would therefore correspond to a minimum commitment of £300,000 at the starting level and £2.5 million at the maximum.

That does not mean every 100MW developer would receive a new £2.5 million bill.

Existing securities and liabilities would count towards the minimum. A project already providing sufficient financial security would not have to duplicate it. Security could also take forms such as guarantees rather than necessarily requiring the entire amount to be handed over as cash.

The mechanism would matter most to projects currently holding relatively inexpensive connection positions.

Ofgem found that half of the battery projects it examined had posted securities below £800 per MW and carried liabilities below £1,500 per MW.

For projects still several years from construction, the proposed floor could therefore produce a substantially earlier financial decision.

#### Why Ofgem Wants That Decision Earlier

Electricity networks are not planned only when a battery, wind farm or power station begins construction.

Network companies must work years ahead, determining where substations, transformers, cables and wider transmission reinforcements will be required.

A project with a firm connection position therefore affects decisions elsewhere in the system even before its own site is built.

If a battery developer holds a connection for years and eventually withdraws, some of the planning and engineering undertaken around that expected connection may no longer be required. Staff and supply-chain capacity can also have been committed to a project that never reaches operation.

Ofgem estimates approximately £460 million of outstanding potential network-inefficiency exposure across the relevant battery queue.

It is not a bill already incurred and it is not an estimate of what Scottish consumers will pay. The regulator constructed the figure from network-cost assumptions to measure the potential exposure created when projects leave after network planning has advanced.

Ofgem itself cautions that the calculation carries substantial uncertainty. It does not have enough information to predict how many developers would actually withdraw if CMP470 were introduced, and network costs differ considerably by location.

There is also a reverse risk. Batteries can sometimes reduce the need for network reinforcement by storing electricity where the network is congested. Removing the wrong project could therefore leave a network underprovided rather than overbuilt.

#### A Financial Test Does Not Necessarily Select the Best Battery

The principal objection to CMP470 is contained within the mechanism itself.

Money is being used as a proxy for commitment.

That can identify developers unwilling to place further capital behind a project. It cannot establish by itself whether one battery is more useful to the electricity system than another.

Ofgem's own impact assessment recognises the possibility that higher security requirements could favour developers with greater access to liquidity rather than projects producing the greatest consumer value. It also identifies a risk to competition if smaller businesses find it more difficult to finance the requirement.

External analysis reaches a similar point.

Energy lawyers at Dentons have described the proposed amounts as relatively small compared with the total cost of constructing a completed battery, but potentially significant for a project that has not yet raised construction finance. Their analysis also notes that larger developers with portfolios and stronger balance sheets may find the requirement easier to absorb than smaller competitors.

Battery developer Root-Power challenged the use of an escalating charge as the sole mechanism during the formal industry process. It proposed allowing more time for the newly reformed queue to settle before the additional commitment took effect, arguing that this could avoid projects being forced out before developers had enough information to make final investment decisions.

Its proposed delay was not supported by a majority of the working group. Other participants argued that waiting longer would leave the current oversubscription unresolved and prolong uncertainty for transmission planners.

Another alternative proposed a much smaller one-off security payment, refundable once a project entered operation. That was also questioned on the grounds that it might be too low to cause developers to surrender unwanted connections.

The process has therefore exposed two competing risks: leaving weak projects in the queue for too long, and using access to finance to remove projects before their eventual value is known.

#### Hunterston Shows What a Fully Financed Project Looks Like

One Scottish battery has moved beyond much of that uncertainty.

Revera Energy announced on 23 September that it had reached financial close on its 400MW/800MWh Hunterston battery in North Ayrshire and had authorised construction to begin.

The project has senior debt from Santander, Barclays, Commonwealth Bank of Australia and NatWest, battery equipment contracted from Sungrow and commercial arrangements with BP and Danske Commodities.

Commercial operation is expected in the third quarter of 2028.

Hunterston sits north of the B6 transmission boundary, the part of the high-voltage network across which electricity moves between Scotland and England. That boundary is one of the points at which the volume of Scottish generation can exceed the network's ability to move it south.

A battery on the northern side can charge when electricity is abundant and release energy at another time, although its actual value will depend on how it operates within electricity markets and network conditions.

Hunterston has therefore reached a very different stage from a project whose principal assets are planning

rights and a future grid position. Banks and investors have committed money, major contracts have been signed and construction has been authorised.

#### Mey Shows the Earlier Stage

The 300MW Mey BESS project in Caithness illustrates another part of Scotland's development pipeline.

Scottish Ministers granted the project consent in January. Its proposed four-hour configuration would provide 1,200MWh of storage.

Developer Ampeak Energy has said it is working towards financial close in 2027 or 2028, with operation targeted for the end of 2029.

The project has therefore secured planning consent but remains in the period between development and construction finance.

Earlier company disclosures said Mey benefited from protected status under the connections reform process. Public information does not yet establish exactly what additional CMP470 security Mey itself would ultimately have to provide, and Ampeak has not said the proposed rule threatens the project.

Its scale nevertheless shows how the arithmetic changes for a development before financial close.

For a 300MW project, a £3,000-per-MW security floor corresponds to £900,000. At £25,000 per MW it corresponds to £7.5 million. Existing securities would be deducted from any requirement, so those figures are not forecasts of what Mey would have to provide.

The issue for projects at this stage is not necessarily whether the ultimate battery can support such sums once financed. It is whether developers want to tie up additional financial capacity while land, grid, contracts, technology and construction finance are still being assembled.

#### It Is Not Yet Possible to Identify Every Scottish Project in the Queue

There is another limitation in assessing the consequences for Scotland.

The public grid registers have not caught up with the reform programme.

Energy-market analyst Modo Energy examined the 83.2GW Gate 2 battery total in September and found that the publicly available registers did not identify the complete population behind it. NESO has published aggregate capacity by area, while individual projects appear in the register only as new offers are accepted.

That means developers know the position of their own projects and NESO knows the complete queue, but an outside observer cannot yet reliably take Scotland's 32.8GW planning pipeline and mark every project as inside or outside CMP470.

It also makes it impossible at present to state how much of Scotland's planning pipeline will disappear because of the proposed financial requirement.

Natural attrition would have occurred in any event. Some projects will fail to secure finance, some will lose commercial appeal as more batteries enter the market, some may change capacity or technology and others will be built.

Ofgem expects that market forces would eventually reduce the queue even without CMP470. Its case for intervention is that this would happen too slowly for network companies making investment decisions now.

The regulator also acknowledges that it cannot predict how many projects the proposed financial requirement would remove.

#### A Consultation, Not Yet a Charge

Ofgem's current document is a minded-to decision rather than a final determination.

The regulator is consulting on the original CMP470 proposal and alternative versions developed during the industry process. It has said the original form currently provides what it considers the strongest balance between clearing the queue, protecting consumers and maintaining an investable connections system.

Responses close at 5pm on 1 October.

Ofgem's consultation timetable gives no fixed date for the final decision, describing the outcome as to be confirmed. The exact obligations faced by Scottish developers will therefore depend on the form of CMP470, if any, that the regulator ultimately approves.

## Sources

Energy Statistics for Scotland – Q1 2026 — Scottish Government, 30 June 2026.

<https://www.gov.scot/publications/energy-statistics-for-scotland-q1-2026/>

Connection and Use of System Code CMP470: Introducing an Oversubscribed Technologies Commitment Fee — Minded-to Consultation — Ofgem, 17 September 2026.

<https://www.ofgem.gov.uk/consultation/connection-and-use-system-code-cusc-cmp470-introducing-oversubscribed-technologies-con>

CMP470 – Introducing an Oversubscribed Technology Fee: Initial Impact Assessment — Ofgem, 17 September 2026. <https://www.ofgem.gov.uk/sites/default/files/2026-09/CMP470-Interim-Impact-Assessment.pdf>

CMP470: Final Modification Report — National Energy System Operator, 14 July 2026.

<https://www.neso.energy/industry-information/codes/cusc/modifications/cmp470-introducing-oversubscribed-technologies-commitment>

CMP470: Code Administrator Consultation — National Energy System Operator, 23 June 2026.

<https://www.neso.energy/document/383551/download>

Reviewing the GB battery connections queue: how much of the 83 GW can we see? — Modo Energy, September 2026.

<https://modoenergy.com/research/English/gb-connections-queue-bess-gate-2-visibility-august-2026-battery-energy-storage-cmp470-l>

Still “too many batteries” in the GB connections queue: first steps on CMP470 — Dentons, 1 May 2026.

<https://www.dentons.com/en/insights/articles/2026/may/1/still-too-many-batteries-in-the-gb-connections-queue>

Mey BESS Consent — Ampeak Energy, 19 January 2026. <https://ampeak.energy/mey-bess-consent/>

Revera Energy Achieves Financial Close and Issues NTP on Hunterston BESS — Revera Energy, 23 September 2026. <https://revera.energy/news/fc-ntp-hunterston>

Scottish Boundaries — National Energy System Operator, accessed 28 September 2026.

<https://www.neso.energy/publications/electricity-ten-year-statement-etys/electricity-transmission-network-requirements/scottish-boundaries>

ENERGY | 30 September 2026

# Electricity VAT Falls to Zero on 1 October, Yet Ofgem's Typical Dual-Fuel Cap Rises £60

Read online: <https://modern.scot/electricity-vat-falls-to-zero-on-1-october-yet-ofgems-typical-dual-fuel-cap-rises-60/>



VAT disappears from domestic electricity bills across Scotland tomorrow, but the representative annual cost under Ofgem's price cap will still rise from £1,663 to £1,723. The reason is largely gas: wholesale prices have risen, gas remains taxed at 5 per cent, and Ofgem says most of the latest increase is being driven by higher gas costs.

Households across Scotland will stop paying VAT on domestic electricity from 1 October, removing a tax

that has until now added 5 per cent to qualifying electricity bills. Yet on the same day, Ofgem's headline energy price-cap figure will rise by £60 a year.

For a representative household using both gas and electricity and paying by direct debit, the annualised figure moves from £1,663 to £1,723 for the period from October to December. That is an increase of 4 per cent, despite electricity itself becoming temporarily zero-rated for VAT.

The two changes appear contradictory until the bill is separated into its component parts.

Electricity VAT is falling. Electricity standing charges are also falling on the Great Britain average used by Ofgem. But gas unit prices are rising substantially, and Ofgem says most of the overall increase in the representative dual-fuel figure now comes from gas.

For Scottish households, the result will depend heavily on what energy they actually use, whether they heat their homes with gas, electricity or another fuel, where they live, how they pay and whether they are on a default or fixed tariff.

## Electricity VAT goes from 5 per cent to zero

The change is not a rebate or a payment households need to apply for.

From 1 October 2026 until 31 March 2027, qualifying domestic electricity supplied in Scotland, England and Wales will be zero-rated for VAT.

The Treasury made the change through the Value Added Tax (Supplies of Domestic Electricity) Order 2026. The legislation modifies the existing VAT rules for the six-month period, creating a temporary zero rate for qualifying electricity supplies in Great Britain.

Other domestic fuels remain subject to the existing 5 per cent reduced VAT rate. That includes domestic gas.

For electricity customers, suppliers should simply stop adding VAT to the qualifying electricity portion of the bill.

The reduction also applies to electricity standing charges because those charges form part of the qualifying electricity supply.

Someone using a prepayment meter does not have to submit a claim either. VAT has previously been included when money is loaded on to the meter; from 1 October it should no longer be applied to qualifying electricity.

The Government says the measure is expected to save households an average of about £45 a year, although the actual saving depends on electricity consumption and tariff.

People who use more electricity than the average household will generally save more in cash terms because there is a larger electricity bill from which the 5 per cent tax is being removed.

## **The headline price cap still rises**

At the same time, Ofgem is increasing the energy price cap for the final three months of 2026.

The regulator's representative figure for a household using both gas and electricity and paying by direct debit rises from £1,663 to £1,723 a year if the new rates were maintained for 12 months.

That does not mean every household will receive a £1,723 bill.

The price cap is not a maximum amount a household can be charged regardless of consumption. It limits the unit rates and standing charges suppliers can apply to customers on standard variable tariffs. A household using more energy pays more; a household using less pays less.

Ofgem's £1,723 figure is therefore an illustration based on its definition of typical domestic consumption.

The regulator says around 20 million households across Great Britain are on standard variable tariffs and are therefore covered directly by the cap. Around 11 million households are on fixed tariffs and will not have their contractual unit prices changed by the new cap.

Those fixed-tariff customers will nevertheless also receive the electricity VAT reduction.

## **Electricity barely moves after the tax cut**

The average direct-debit electricity unit rate under the cap changes only slightly.

Between July and September the Great Britain average was 26.11 pence per kilowatt hour, including 5 per cent VAT. From 1 October the published average becomes 26.32 pence per kilowatt hour, with no VAT included.

The average electricity standing charge falls from 57.19 pence a day to 54.83 pence.

Those are Great Britain averages rather than universal Scottish tariffs. Electricity unit rates and standing charges vary between regions, including within Scotland, because network and other costs differ geographically.

Nevertheless, the national comparison shows what the VAT intervention has done to the electricity side of the calculation.

Wholesale and other underlying costs have risen enough that removing 5 per cent VAT does not produce a corresponding 5 per cent fall in the headline electricity unit rate. Instead, it has largely prevented those increases from producing a larger rise.

Ofgem says that without the VAT change, its representative annual price-cap figure would have been approximately £45 higher.

## **Gas is where the increase appears**

The larger movement is in gas.

The average direct-debit gas unit rate rises from 7.33 pence per kilowatt hour to 7.97 pence from 1 October. The average gas standing charge rises from 29.04 pence to 29.68 pence a day.

VAT on gas remains at 5 per cent.

Ofgem says gas bills within its representative calculation are rising by about 8 per cent and that most of the increase in the overall price cap is therefore being driven by gas rather than electricity.

The regulator attributes the movement principally to higher international wholesale gas prices. It says wholesale prices rose by 11 per cent during the three months used in the latest calculation, with international market conditions remaining the dominant factor behind the change.

This matters because gas prices continue to influence the cost of electricity as well as the price households pay directly for gas.

Great Britain's wholesale electricity market frequently uses gas-fired generation to meet marginal demand, meaning changes in international gas prices can still affect electricity costs even as more electricity is generated from renewables, nuclear and other sources.

## **Electric-only households face a different calculation**

The headline £60 increase therefore does not describe every household equally.

Ofgem says households that do not use gas should experience a much smaller increase under the new cap, of less than 1 per cent on its representative calculations.

That distinction is particularly relevant in Scotland, where domestic energy systems vary considerably between cities, rural communities and islands.

A household heated principally by mains gas will experience the increase differently from a household using electric heating. Homes relying on heating oil, LPG or other fuels have yet another cost structure: their electricity benefits from the VAT reduction, but their principal heating fuel sits outside Ofgem's domestic gas-and-electricity price cap.

For a household using significant amounts of electricity — including some homes with electric heating — removing electricity VAT can therefore have a larger effect than the £45 national-average saving quoted by the UK Government.

The saving is proportional to qualifying electricity expenditure rather than being a flat payment.

## **The price cap itself has also changed underneath the headline**

There is another reason comparisons with previous headline price-cap figures need care.

Ofgem has updated the amount of energy it assumes a typical household consumes.

The regulator says households are now using around 7 per cent less electricity and 17 per cent less gas than under its previous typical-consumption assumptions. It has therefore reduced the Typical Domestic Consumption Values used to illustrate the cap.

Using the new consumption assumptions, the representative figure moves from £1,663 to £1,723.

Ofgem says that if the older 2023 consumption assumptions were still used, the equivalent figures would be £1,862 before the October change and £1,935 afterwards.

The unit prices and standing charges are therefore more useful than the single headline number when comparing what individual households may actually pay.

The £1,723 figure is a modelled annual cost at defined consumption levels. It is not a guaranteed bill and it is not directly comparable with every historical cap figure unless the underlying consumption assumptions are also considered.

## **The VAT reduction applies to fixed tariffs too**

Households that previously moved to a fixed energy tariff occupy another category.

The October price-cap increase does not alter the price agreed in an existing fixed-rate contract. Ofgem estimates that around 35 per cent of households are currently on fixed tariffs.

But the removal of electricity VAT applies independently of the price cap.

The Government says suppliers should therefore remove VAT from qualifying domestic electricity even where the customer has already fixed the underlying tariff.

That means a household on a fixed tariff can receive a reduction in the tax charged on electricity without being exposed to October's increase in capped standard-variable gas and electricity rates.

## **The tax cut lasts six months**

The zero rate is temporary.

The legislation applies to qualifying supplies made between 1 October 2026 and 31 March 2027.

Unless the law is changed again, the special zero rate therefore expires at the end of March.

The Government announced the measure in July as an immediate cost-of-living intervention. It estimated that the reduction would cost approximately £850 million during the 2026–27 financial year.

It also made an unusual connection between the tax measure and another area of government policy: ministers said the electricity VAT reduction for this financial year was being funded from money released by cancelling the UK Government's proposed £1.8 billion digital identity programme.

## **How the VAT cut is being paid for**

The UK Government says the temporary cut in VAT on domestic electricity will cost about £850 million in 2026–27. It says that cost is being met from savings created by cancelling a separate £1.8 billion Digital ID programme that had been planned over three years.

This does not mean money from a dedicated digital-ID account has simply been transferred to household

energy bills. The Government says the £1.8 billion programme would itself have required savings to be found elsewhere in existing departmental budgets. After the programme was cancelled, those planned savings were instead redirected towards the electricity VAT reduction.

The funding decision does not affect the way the VAT cut works. From 1 October 2026 until 31 March 2027, qualifying domestic electricity in Scotland, England and Wales is charged VAT at zero rather than 5 per cent. Other domestic fuels, including gas, remain subject to the existing 5 per cent rate.

For households, there is nothing to apply for. Suppliers are expected to remove the VAT automatically from qualifying electricity bills, including fixed tariffs.

## What changes on the bill tomorrow

From 1 October, qualifying electricity should be billed without VAT. Gas will continue to include 5 per cent VAT. Customers on standard variable tariffs will also move on to the new Ofgem cap rates for their region and payment method.

On the Great Britain direct-debit averages published by Ofgem, electricity will cost 26.32 pence per kilowatt hour with a 54.83 pence daily standing charge. Gas will cost 7.97 pence per kilowatt hour with a 29.68 pence daily standing charge.

The figures individual Scottish households see may differ because the cap varies by electricity and gas region, payment type and meter arrangement.

The direction of the change, however, is clear.

The tax on domestic electricity is disappearing for six months. It has prevented a larger increase in the overall cap, but it has not been enough to make the representative dual-fuel bill fall.

From tomorrow, electricity becomes tax-free while the cost of a typical gas-and-electricity household under Ofgem's cap still rises.

## Sources

Energy price cap will rise by 4% from October 2026 — Ofgem, 26 August 2026.

<https://www.ofgem.gov.uk/press-release/energy-price-cap-will-rise-4-october-2026>

Energy price cap unit rates and standing charges — Ofgem, rates for 1 October to 31 December 2026.

<https://www.ofgem.gov.uk/your-energy-supply/your-energy-bill/energy-price-cap-unit-rates-and-standing-charges>

The Value Added Tax (Supplies of Domestic Electricity) Order 2026 — UK Statutory Instrument 2026 No. 987, made 7 September 2026. <https://www.legislation.gov.uk/ukxi/2026/987/made>

Temporary zero rate of VAT for domestic electricity in Great Britain — HM Revenue & Customs, 8 September 2026.

<https://www.gov.uk/government/publications/temporary-zero-rate-of-vat-for-domestic-electricity-in-great-britain>

Fuel and power (VAT Notice 701/19) — HM Revenue & Customs, updated 8 September 2026.

<https://www.gov.uk/guidance/vat-on-fuel-and-power-notice-70119>

Breathing space on your energy bill — Department for Energy Security and Net Zero, 26 August 2026.

<https://www.gov.uk/government/news/breathing-space-on-your-energy-bill>

New PM cuts tax on household electricity bills to give breathing space on cost of living — Prime Minister's Office, HM Treasury and Department for Energy Security and Net Zero, 21 July 2026.

<https://www.gov.uk/government/news/new-pm-cuts-tax-on-household-electricity-bills-to-give-breathing-space-on-cost-of-living>

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POLICY AND GOVERNMENT | 28 September 2026

# Scotland Has No Compulsory Sale Order — and England's Six-Month Empty-Home Reform Does Not Apply Here

Read online: <https://modern.scot/scotland-has-no-compulsory-sale-order-and-englands-six-month-empty-home-reform-does-not-apply-here/>



If you own a property in Scotland, rent one out, are trying to sell one, or have seen reports that councils are being given the power to take over homes after they have stood empty for six months, the position in Scotland is straightforward: no such six-month power has been introduced here.

Scotland does not have Compulsory Sale Orders. It does not have Compulsory Lease Orders. Nor does it have the Empty Dwelling Management Order system that

the UK Government has just announced it will strengthen in England.

The English announcement has nevertheless created an easy source of confusion because it concerns empty privately owned homes, local-authority intervention and a new six-month threshold. But the mechanism being changed in England is not a compulsory sale order, and it does not transfer ownership of a house to a council.

## What England Has Actually Announced

On 27 September 2026, the UK Government announced reforms to England's existing Empty Dwelling Management Order system, normally known as EDMOs.

EDMOs are not new. They were created under the Housing Act 2004 and allow English councils, after following the statutory procedure, to take over the management of qualifying privately owned homes that have been left empty.

The principal change announced this week is the qualifying period. At present, a property must have been empty for two years before becoming eligible for an EDMO. The Government says that period will be reduced to six months.

It has also announced that evidential requirements involving matters such as anti-social behaviour and evidence of community support for intervention will be removed, making it easier for councils to apply to the Residential Property Tribunal.

The Government announcement does not say that ownership passes to the council. It specifically states that ownership remains with the property owner while the local authority takes over management and seeks to return the home to occupation. An EDMO can ultimately operate for up to seven years.

Nor should the announcement be read as meaning that every English home automatically becomes council-controlled on the day it has been empty for six months. The council still has to use the statutory EDMO procedure. The six-month period establishes eligibility for intervention rather than automatically transferring control.

The UK Government announcement also uses future language. It says the qualifying period “will” be reduced. It does not state that the six-month threshold came into force on 27 September.

## Scotland Has No Equivalent EDMO System

None of that changes the law applying to an empty house in Scotland.

A Scottish property does not become liable to council takeover because it has stood empty for six months. There is no Scottish Empty Dwelling Management Order through which a council can assume management of a private home on the English model.

The principal compulsory property mechanism already available to Scottish councils is the Compulsory Purchase Order, or CPO.

A CPO is fundamentally different. Public authorities can use compulsory-purchase powers where there is a sufficiently strong public-interest case and the relevant statutory requirements are satisfied. A council can promote an order and ask Scottish Ministers to confirm it. If the acquisition proceeds, the authority can obtain ownership and compensation is payable to the owner and others with qualifying interests.

Scottish Government guidance makes clear that compulsory purchase is a significant interference with property rights and that the public benefit has to be balanced against the rights of those affected.

There is no general rule under which simply leaving a Scottish home vacant for six months, 12 months or another fixed period activates compulsory purchase.

## What a Compulsory Sale Order Would Do

A Compulsory Sale Order would create a different mechanism again.

Rather than a council buying the property through compulsory purchase, the concept considered by the Scottish Government would allow a local authority, in defined circumstances, to require a property to be sold without the owner voluntarily choosing to sell it.

The idea has been discussed in Scotland for years, particularly as a possible way of dealing with persistently vacant or derelict buildings where attempts to secure voluntary action have failed.

But discussion of a power is not the same as having the power.

The Scottish Government included Compulsory Sale Orders and Compulsory Lease Orders in its consultation on compulsory-purchase reform, which ran from September to December 2025. When it published its conclusions in August 2026, it described those questions as exploratory and stated explicitly that neither mechanism currently exists.

## Consultation Support Did Not Create a New Law

The consultation produced substantial support for the principle of compulsory sale among those who responded.

Eighty individuals and organisations answered at least one question in the compulsory sale and lease section. Among respondents answering whether local authorities should be able to instruct the sale of property without the owner’s permission, 69 per cent said yes and 31 per cent said no.

That figure is a measure of consultation respondents, not a Scottish public-opinion poll.

Support was particularly strong among organisational respondents. Vacant and derelict properties were repeatedly identified as circumstances in which such a power might be useful.

The same consultation also exposed the practical and legal questions that would have to be resolved. Respondents raised costs, council staffing and expertise, legal disputes, human-rights protections and the safeguards needed when the state intervenes in private property rights.

Seventy-two per cent of those answering another consultation question thought the procedure for a Compulsory Sale Order should be broadly equivalent to the procedure used for compulsory purchase. That created a further question for ministers: if compulsory sale required many of the same safeguards and procedures, would it actually be simpler, faster or cheaper than a reformed CPO system?

## **The Scottish Government Has Not Committed to Introducing It**

The Scottish Government has decided to proceed with major reform of Scotland's existing compulsory-purchase system during the current parliamentary term.

Its programme includes plans for a single Compulsory Purchase Act, changes intended to make approval faster and more certain, digital procedures, new forms of temporary possession and reform of compensation arrangements.

Compulsory Sale Orders have not been included as an agreed part of that legislative programme.

The distinction was made particularly clear at the Scottish Parliament this month.

Scottish Labour MSP Paul Sweeney asked when ministers planned to introduce legislation establishing Compulsory Sale Orders and whether such powers would appear in legislation during the current parliamentary session.

The Scottish Government replied on 16 September that it would continue examining whether compulsory-sale powers could provide advantages beyond a reformed compulsory-purchase system.

Another question referred to measures being taken while a statutory framework for Compulsory Sale Orders was being developed. The Government rejected that premise, stating that it had not committed to developing such a statutory framework.

That remains the Scottish position.

## **Scotland Can Already Use Compulsory Purchase for Empty Property**

The absence of Compulsory Sale Orders does not mean councils have no compulsory powers concerning vacant or derelict buildings.

The Scottish Government says existing CPO powers can support projects ranging from major infrastructure and regeneration schemes to the refurbishment of individual empty homes and derelict properties.

It is also possible to use what are sometimes described as "back-to-back" CPO arrangements. A council can compulsorily acquire property where the intention is subsequently to dispose of it to a third-party developer that finances or carries out the work.

That existing route is one reason ministers are examining whether a separate compulsory-sale mechanism would add enough to justify creating another statutory system.

Glasgow City Council is currently piloting the use of CPO powers to acquire empty properties with a view to selling them as private-sector development opportunities. The Scottish Government says it intends to examine the lessons from that work while considering future reform.

## **Why the Six-Month Figure Can Be Misleading in Scotland**

Six months does appear in Scotland's official empty-property statistics, but it has a completely different function.

The latest Scottish Government figures show that 44,453 properties liable for Council Tax had been empty for more than six months in September 2025.

Of those, 32,337 had been empty for more than 12 months.

Those figures cover housing across all tenures, including owner-occupied, privately rented and social housing. They should not be interpreted as 44,453 abandoned privately owned homes or as properties that could automatically be subjected to compulsory action.

A property may be empty because of renovation, probate, structural problems, a pending sale or letting, difficulties in the local housing market, or many other circumstances.

The Scottish Government's current Council Tax guidance also uses a different threshold. For that guidance, an empty home is one that has been empty for less than 12 months, while a long-term empty home is one that has been empty for 12 months or more.

Councils have discretion over Council Tax treatment of second and long-term empty homes and can use premiums as a housing-policy measure. That is a taxation power. It is not a power to take ownership or management of the property.

## **What This Means for a Property Owner in Scotland**

The English announcement therefore does not create a new six-month deadline for Scottish property owners.

A home in Scotland does not become available for council seizure, compulsory sale, compulsory leasing or council management merely because it has been empty for six months.

A Scottish council may work with the owner through its empty-homes service. It may apply the Council Tax rules available to it. In a sufficiently justified case it may consider existing compulsory-purchase powers.

But there is presently no Scottish Compulsory Sale Order, no Compulsory Lease Order and no English-style Empty Dwelling Management Order.

England is changing an existing statutory management system. Scotland is reforming its existing compulsory-purchase system while continuing to examine whether compulsory sale would provide anything sufficiently different to justify introducing it.

For Scotland, six months is currently a useful point in the statistical measurement of empty properties. It is not the point at which a council gains the legal right to take one over.

## Sources

New reforms to bring more long-term empty homes back into use — Ministry of Housing, Communities and Local Government, 27 September 2026.

<https://www.gov.uk/government/news/new-reforms-to-bring-more-long-term-empty-homes-back-into-use--2>

Compulsory Purchase Reform in Scotland: The Way Forward — Scottish Government, 26 August 2026.

<https://www.gov.scot/publications/compulsory-purchase-reform-scotland-way-forward/>

Compulsory sale and lease orders: consultation analysis report — Scottish Government, 26 August 2026.

<https://www.gov.scot/publications/compulsory-sale-lease-orders-consultation-analysis-report/>

Questions S7W-02804, S7W-02805, S7W-02806 and S7W-02807 — Scottish Parliament, answered 16 September 2026.

<https://www.parliament.scot/home/chamber-and-committees/questions-and-answers?page=86>

Second Homes and Empty Properties in September 2025 — Scottish Government, 16 December 2025.

<https://www.gov.scot/publications/second-homes-and-empty-properties-in-september-2025/>

Compulsory purchase orders: introduction — Scottish Government, last updated 21 July 2025.

<https://www.gov.scot/publications/compulsory-purchase-orders-introduction/>

Local government finance circular 6/2026: council tax on second and long-term empty homes guidance — Scottish Government, 25 March 2026.

<https://www.gov.scot/publications/local-government-finance-circular-6-2026-council-tax-on-second-and-long-term-empty-homes-gu>

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HERITAGE AND ARTS | 1 October 2026

# When Scotland Made Christmas a Working Day: Yule Customs That Survived

Read online: <https://modern.scot/yuletide-customs-of-old-scotland/>



Scotland did not simply stop celebrating Christmas after the Reformation. Kirk courts punished people for keeping Yule, Parliament removed the Christmas court holiday, and Christmas Day remained an ordinary working day for generations. Yet the old season persisted in bread, candles, fires, games, omens and household customs — while much of the public celebration moved towards Hogmanay.

In Aberdeen in December 1574, fourteen women were called before the kirk session for what the record described as “playing, dancing & singing of filthy carols on Yule day”. They were admonished.

The surviving minutes make the scene unusually clear. The Reformation had already transformed Scotland’s official religious life, but people were still keeping Yule. Elsewhere the authorities complained about cards and dice, masked dancing, bells, Yule loaves, disguising, heavy drinking and other activities that belonged to the old festive season. In Glasgow, on 26 December 1583, five people were ordered to make public repentance for keeping Yule.

Those cases are a better starting point for the history of Scottish Christmas than the familiar claim that Christmas was simply “banned” and disappeared. It did not disappear. It became contested.

Before the Reformation, Yule had been woven into the calendar of royal, religious and household life. Afterwards, the reformed kirk attacked the observance of feast days that had no scriptural authority. Parliament eventually removed the Yule vacation from the courts. Christmas could be treated as an ordinary working day. Yet the language of Yule, and a remarkable collection of practices attached to it, continued to appear in Scottish records for centuries.

Some of the customs are well documented. Others survive only in later folklore. And some of the explanations repeated today, that Hogmanay comes from the French words for “man is born”, that first-footers had to be dark because fair-haired Vikings once brought terror to Scottish doors, or that a Highland cloud-bull was a survival of the cult of Mithras, are much less secure than the customs themselves.

## Before the Reformation, Scotland Kept Yule in Public

At the court of James IV, Yule was not a private or apologetic affair. Royal accounts place the king and his household celebrating the season at Edinburgh Castle, Holyrood, Aberdeen, St Andrews, Linlithgow and Arbroath. The court moved, and Yule moved with it.

Food, greenery, entertainers and games formed part of the season. Historic Environment Scotland’s examination of the royal accounts records evergreen decoration including holm, ivy and bays. A substantial Yule stock or log provided heat during the festive period. Royal fools travelled to wherever the king was keeping Yule, while the treasurer paid for costumes and “play coats” for performances and masking.

Twelfth Night and Epiphany were part of the same long season rather than an afterthought to a single day on 25 December. Court entertainments included the choosing of a King or Queen of the Bean, in which a bean hidden in festive food could determine the ceremonial ruler of the occasion. Christian Rae is recorded as Queen of the Bean in 1531. On Epiphany in 1540, an early form of David Lyndsay's great satirical drama later known as *Ane Satyre of the Thrie Estaitis* was performed before the court.

Seasonal misrule was already attracting official hostility before the Protestant Reformation. In 1555, during the regency of Mary of Guise, Parliament prohibited the choosing of figures including Robin Hood, Little John, the Abbot of Unreason and the May Queen. Anyone accepting such an office could face severe penalties, including banishment. The legislation belongs to a broader attempt to regulate popular disorder rather than a specific Protestant suppression of Christmas, but it shows that festive customs were already a matter of public authority.

## The Kirk Attacks the Calendar

The decisive change came after the Scottish Reformation of 1560.

The reformed Church of Scotland rejected the old cycle of saints' days and religious festivals that it regarded as unscriptural. In 1575 the General Assembly abolished the keeping of holy days other than the Sabbath, specifically including Yule and saints' days.

The order did not make centuries of custom disappear. That is why the kirk-session records are so valuable. Authorities only had reason to discipline people for keeping Yule because people were still keeping it.

Aberdeen's fourteen women were not an isolated example. The records preserved by National Records of Scotland show local kirk authorities pursuing Christmas observance, while the vocabulary of the complaints gives glimpses of the celebration itself: singing, dancing, gaming, disguising, festive baking and drinking.

The pressure continued into the seventeenth century. In 1640 the Scottish Parliament abolished the "Yule vacance", the Christmas recess observed by the Court of Session. The act declared that the kirk had been purged of the "superstitious observation" of days and therefore removed the Yule holiday. Parliament acted again in 1690 to discharge the Yule vacation.

At local level the principle could be still plainer. Records from St Andrews in the seventeenth century include orders that Yule should not be kept and that people should work as on an ordinary working day. Keeping Christmas was therefore not merely discouraged as excessive merrymaking. Work itself could become a demonstration that the day possessed no special religious status.

This is one reason Scotland's later relationship with Christmas differed so markedly from England's. The public festival lost institutional support while New Year retained a much larger place in Scottish winter life. But neither church discipline nor parliamentary legislation created a clean break between an "old Christmas" and a Scotland without seasonal custom.

## The Word Yule Refused to Disappear

The Scots language preserves the evidence.

The Dictionary of the Scots Language records Yule in Scotland as both Christmas Day and the wider festive season, sometimes extending beyond New Year. Its older forms descend through Scots and northern English from the same Germanic family as Old English *geol* and Old Norse *jól*.

That linguistic history is real. The elaborate modern story that Yule was the twelfth name of Odin, who travelled the earth in a hooded cloak leaving bread or coins beside deserving hearths, is another matter. It is not needed to explain the Scottish word, and it should not be presented as established history without evidence.

The dictionary's compounds are more revealing than any invented origin story. Scots spoke of Yule ale, Yule bannocks, Yule bread, Yule brose, Yule candles, Yule fires, Yule geese, Yule cheese, Yule fish, Yule sheep, Yule sowans, Yule stacks of peat and Yule wages.

This is the vocabulary of lived practice.

In Angus, an early nineteenth-century account described the first person opening the door on Yule morning as “letting in Yule”. Bread and cheese could be set at the open doorway. In northern Scotland, merchants gave Yule candles to regular customers. Some households let the candle burn itself out; others carefully extinguished and preserved it. A later Hebridean description records a large Yule candle expected to burn through the twelve nights.

Food was equally regional. An Orkney account from 1795 says every house practised killing a sheep on Yule Eve, the animal being known as the Yule sheep. In the north-east, Yule bread was baked for members of the household and could carry omens for the coming year. Yule sowans — a fermented oat preparation — might contain a ring, button, coin or other objects used in divination.

A striking Banffshire description from the nineteenth century records a large log called the “Yeel Carlin” being placed on the fire on Christmas Eve while Yule bread was baked. It is tempting to turn every such object into the remnant of an ancient pre-Christian rite, but the surviving record does not require that conclusion. What it establishes is that distinctive Christmas fire and baking customs continued in north-eastern Scotland long after the Reformation.

## Nollaig Mhòr and Nollaig Bheag

Gaelic tradition adds another layer and also corrects a common misunderstanding.

The modern Gaelic word for Christmas is Nollaig. LearnGaelic records the older distinction between Nollaig Mhòr, the Big Christmas, meaning Christmas itself, and Nollaig Bheag, the Little Christmas, meaning New Year's Day.

Nollaig Bheag is sometimes repeated in English-language accounts as an old Gaelic name for Christmas. The source does not support that usage. It distinguishes the two festivals.

The same Gaelic material preserves a traditional rhyme saying that there was never a summer without sun, never a winter without snow, and never a great Christmas without meat. The point is not romantic atmosphere but food. Meat, scarce or expensive at other times, belonged to the remembered abundance of the Christmas season.

The word Nollaig itself is also more securely explained through the history of Gaelic than through Scandinavian mythology. Older Gaelic forms are related to cognate Celtic Christmas words and have been connected by Gaelic scholars with Latin language associated with birth and nativity.

## Hogmanay Did Not Come From “Homme est né”

Perhaps the most persistent story about Scottish New Year is that the word Hogmanay comes from the

French homme est né, “man is born”, supposedly carried to Scotland through the Auld Alliance.

It is an attractive explanation. It is not the explanation preferred by the Dictionary of the Scots Language.

The dictionary notes that the word’s origin has long been disputed but identifies the strongest derivation as a borrowing from northern French dialect forms such as hoginane, related to sixteenth-century French aguillanneuf. Those words referred to a New Year gift, a cry made when asking for such a gift, or New Year’s Eve itself. The Scottish borrowing probably occurred before about 1560 and may indeed reflect the long French connection, but not through the phrase “man is born”.

Early Scots records fit the gift-gathering meaning. A form of Hagmané is recorded at Elgin in 1604, and later accounts describe people going from door to door on New Year’s Eve crying for Hogmanay gifts.

The shift of public winter celebration towards New Year is therefore not merely a Victorian invention. Hogmanay had its own established vocabulary and customs while Christmas remained under stronger ecclesiastical suspicion.

## First-Footing: The Custom Is Older Than Its Familiar Explanation

First-footing became one of the most recognisable Scottish New Year customs, but the documentary trail is more useful than the legends attached to it.

The Dictionary of the Scots Language gives a 1792 Edinburgh example of the New Year meaning of “first-fit”: the first person to enter a house on New Year’s morning, whose arrival was believed to affect the household’s luck. By 1810 a source stressed the importance of the visitor being a fortunate or “sonsie” person. An 1818 description says a first-footer might arrive with a hot drink and currant bun, or bread and cheese.

Later records document preferences about appearance. An 1877 Galloway source says a fair-complexioned first-footer was considered unlucky. Twentieth-century oral histories remember a dark-haired man carrying coal, bun or shortbread as the desired visitor.

What the records do not establish is the familiar explanation that blond visitors were feared because they recalled Norse raiders. That may be a later attempt to explain the taboo, but it should not be stated as the historical origin without stronger evidence.

The custom itself varied. Food, drink, fuel and money all appear as first-foot gifts in different places and periods. Coal became especially familiar because it represented fuel for the household fire. The first-footer was not simply delivering an object: the visitor crossed the threshold carrying good wishes and participated in the household’s first social exchange of the year.

## Handsel Was Older Still

The New Year gift had an old Scottish vocabulary of its own.

A handsel was a gift marking a beginning — a new year, new undertaking, new house or other first occasion — and carried the idea of good fortune. The word occurs in older Scots centuries before the modern ritual package of coal, whisky and black bun became standardised in popular memory.

Handsel Monday, the first Monday of the year, developed as another gift-giving day in parts of Scotland. Servants, children, workers and dependants might receive money or other gifts. It belonged to the same broad culture in which the opening of the year was treated as a moment when the first action, visitor, gift

or payment could set the pattern for what followed.

## **Black Bun Has a History, But Not the One Usually Told**

Black bun is genuinely Scottish festive food, but it does not need a prehistoric origin to be interesting.

The Dictionary of the Scots Language records bun in eighteenth-century Scotland as a plum cake or Twelfth cake. In 1808 it was described as a sweet cake or loaf containing fruit and spices and particularly associated with New Year. The name “black bun” appears later as the familiar Hogmanay cake enclosed in pastry.

That evidence supports a historical relationship between rich festive fruit cakes, Twelfth Night food and the later Scottish New Year bun. It does not establish that black bun directly replaced an ancient Scandinavian “sun cake”, nor that the radial markings on modern shortbread are the surviving rays of a solar emblem. Those explanations are often repeated but are much harder to document.

The recorded Yule breads are interesting enough without them. North-eastern sources describe individual Yule cakes baked for members of a household, with the appearance of each cake interpreted as an omen. Other records describe Yule bannocks and richly seasoned bread. Food was both celebration and divination.

## **The Bees, the Bull and the Border Between Custom and Folklore**

Some Scottish seasonal beliefs belong explicitly to folklore rather than observable custom, and that distinction makes them more, not less, valuable.

Collections of Scottish folklore record a belief that bees behaved unusually at Christmas. In some accounts they were said to sing in their hives on Christmas Eve. Later Gaelic material records versions in which bees left their hives briefly at a significant hour.

The belief should be presented as belief. There is no need to invent a naturalistic explanation in which bees supposedly emerged because worshippers returning from church disturbed them. The important fact is that people told and preserved the story.

The Candlemas Bull is better documented than its modern explanations. William Grant Stewart included it in his 1823 study of Highland superstitions and festive amusements. The “bull” was a passing cloud imagined in bovine form, and its direction or appearance was read as an omen for the year ahead. Stewart himself admitted that he could not explain the origin of the belief.

That admission is significant. Later claims that the custom descended from the ancient Mithraic bull cult go much further than the early source. There is no need to manufacture a classical pedigree for an already remarkable Highland weather omen.

Divination appears repeatedly around the turning of the year: objects hidden in food, the condition of bread, the identity of the first visitor, the direction of a cloud, and other signs read for marriage, prosperity, death or misfortune. These customs were not uniform throughout Scotland and were not necessarily practised at the same date. Regional evidence matters.

## **Candles Survived, But the Evidence Is Regional**

The old tradition of describing a universal Scottish “Night of Candles”, with lights in every window to guide the Holy Family and later the first-footers, needs qualification.

There is good evidence for Scottish Yule candles. An 1808 dictionary account says northern merchants gave

them to regular customers. A Hebridean account later in the nineteenth century describes a large candle intended to last through the festive nights.

What is harder to establish is a single nationwide Scottish rule that every household placed candles in every window for the Holy Family. Similar customs are found elsewhere in Britain and Ireland, and practices could travel or overlap. The surviving Scottish evidence is strongest when it stays local: a merchant's gift, a household candle, a particular district's method of burning or preserving it.

That local character is a recurring feature of Scottish Yule. There was no one fixed national ceremony. Orkney, Shetland, the north-east, the Highlands, the Hebrides, Lowland burghs and later industrial towns preserved different combinations of food, fire, visiting, sport and belief.

## Christmas Really Did Become a Working Day

The long consequence of Reformation policy can still be heard in twentieth-century voices.

An oral-history recording held by Tobar an Dualchais preserves the memories of Gladys and Charles Simpson, born in 1911 and 1913. In their youth, they recalled, Christmas was not celebrated and was a working day. The children hung their stockings for Santa at Hogmanay instead. Whisky, port, cake and shortbread were set out for New Year visitors, and the desired first-footer was a dark-haired man carrying coal.

That testimony should not be turned into the claim that nobody in Scotland celebrated Christmas. Families, denominations and regions differed. Catholic and Episcopalian communities maintained Christmas observance; urban practice changed; employers differed; and domestic celebrations could exist even where the day was not a general holiday.

But the memory of Christmas as an ordinary working day was real, and it survived into living memory.

The legal position also requires precision. Christmas Day was placed among Scotland's bank holidays by the Banking and Financial Dealings Act 1971. A bank holiday did not and does not give every worker an automatic statutory right to the day off; employment contracts and industrial practice matter. The change from working Christmas to the modern holiday therefore happened gradually rather than on one morning when Scotland suddenly "got Christmas back".

## What Scotland Actually Preserved

The history of Scottish Yule becomes clearer once the most attractive origin stories are separated from the records.

There was a substantial pre-Reformation Christmas season, visible at court and in the wider ritual calendar. The reformed kirk deliberately attacked the keeping of Yule and other holy days. Parliament removed the Yule vacation. Kirk sessions punished people who continued to celebrate. Work on Christmas Day acquired religious meaning because treating it like any other day demonstrated rejection of the old feast.

Yet Yule survived in speech and practice. Scots continued to bake Yule bread, make Yule brose and sowans, kill Yule sheep, light Yule fires and candles, store Yule peat, play Yule games and tell stories about what animals, weather and visitors might reveal about the year to come.

Meanwhile New Year accumulated much of the public energy that Christmas had lost. Hogmanay gift-seeking, handsel, first-footing, food, drink and visiting formed a durable winter celebration of their own. In some twentieth-century childhoods, even Santa arrived at Hogmanay.

There is no need to imagine that every custom is an unchanged fragment of pagan Scandinavia or ancient Celtic religion. Nor is it accurate to say that Scotland simply ceased to have Christmas after 1560.

The more unusual truth is that Scotland spent centuries arguing over the calendar while people kept finding ways to mark the darkest part of the year.

## Sources

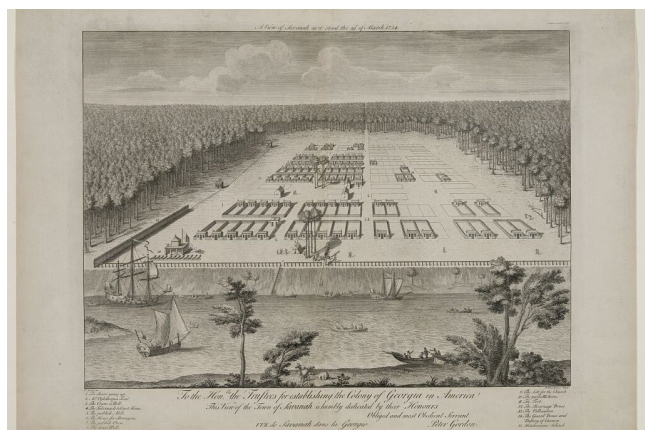
- Christmas: Banned in Scotland! — National Records of Scotland, 10 December 2018. National Records of Scotland.
- Yuletide Tidings from the Court of James IV — Historic Environment Scotland, 17 December 2025. Historic Environment Scotland.
- Concerning Robin Hood and the Abbot of Unreason, chapter 40 — Records of the Parliaments of Scotland to 1707, act of 20 June 1555; K. M. Brown et al., eds., University of St Andrews. Records of the Parliaments of Scotland.
- Act discharging the Yule vacation — Records of the Parliaments of Scotland to 1707, 5 June 1640; K. M. Brown et al., eds., University of St Andrews. Records of the Parliaments of Scotland.
- Parliamentary proceedings recording royal assent to the Act discharging the Yule vacation — Records of the Parliaments of Scotland to 1707, 19 July 1690; K. M. Brown et al., eds., University of St Andrews. Records of the Parliaments of Scotland.
- Yule — Scottish National Dictionary, Dictionaries of the Scots Language; entry first published 1976, with later supplementary material. Dictionaries of the Scots Language.
- Hogmanay — Scottish National Dictionary, Dictionaries of the Scots Language; entry first published 1960, with later supplementary material. Dictionaries of the Scots Language.
- Hagmané — A Dictionary of the Older Scottish Tongue, Dictionaries of the Scots Language; historical citations from 1604 and 1692. Dictionaries of the Scots Language.
- First-fit — Scottish National Dictionary, Dictionaries of the Scots Language; entry first published 1956, with historical citations from 1792 onwards for the New Year custom. Dictionaries of the Scots Language.
- Handsel — Scottish National Dictionary, Dictionaries of the Scots Language. Dictionaries of the Scots Language.
- Bun and Black Bun — Scottish National Dictionary, Dictionaries of the Scots Language; historical descriptions from 1782 and 1808 and later Hogmanay usage. Bun; Black Bun.
- Where did the word Nollaig come from? — LearnGaelic; accessed 1 October 2026. LearnGaelic.
- The Folk-Lore of the North-East of Scotland — Walter Gregor, Elliot Stock, 1881. Historical descriptions of Yule food, baking, divination and seasonal belief; also preserved in later Scottish dictionary evidence.
- The Popular Superstitions and Festive Amusements of the Highlanders of Scotland — William Grant Stewart, first published 1823; later edition digitised by Project Gutenberg. Project Gutenberg.
- Christmas not celebrated; stockings hung up at Hogmanay; other New Year traditions — Tobar an Dualchais / Kist o Riches, School of Scottish Studies recording SA1985.141, testimony of Gladys and Charles Simpson. Tobar an Dualchais.
- Hogmanay concert and dance in Kirkcowan — Tobar an Dualchais / Kist o Riches, School of Scottish Studies recording SA1982.115. Tobar an Dualchais.

- Banking and Financial Dealings Act 1971 — UK Parliament, 16 December 1971, Schedule 1. UK Legislation.
  - Bank and public holidays — House of Commons Library, 14 March 2025. House of Commons Library.
-

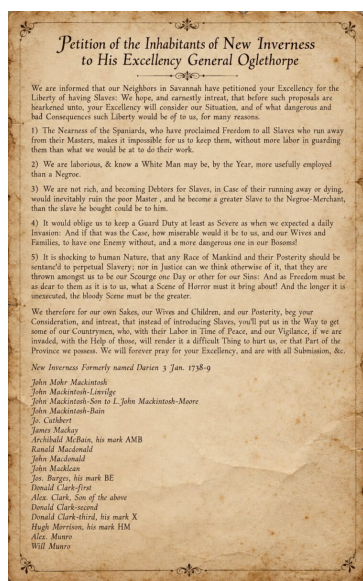
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# The Highland Scots Who Opposed Slavery in Colonial America

Read online: <https://modern.scot/the-highland-scots-who-opposed-slavery-in-colonial-america/>



The famous declaration that perpetual slavery was “shocking to human nature” is genuine. So are the petition’s arguments about debt, labour, Spanish Florida and security. Newly revisited records also show Scots campaigning on both sides of the dispute, a political dossier compiled against the pro-slavery faction, and later testimony from one Darien signatory who said he had not known what he was signing.



On 3 January 1739, eighteen Highland Scots at Darien (then called the New Inverness), on the southern frontier of the British colony of Georgia, put their names to one of the most striking documents from the colony’s early history. They asked James Oglethorpe to reject demands from Savannah settlers who wanted the right to use enslaved African labour. The sentence for which the document is now best known is unequivocal. Perpetual hereditary slavery, the Darien settlers wrote, was “Shocking to human nature”. They added that freedom “must be as dear” to the enslaved as it was to themselves.

Those words have helped give the petition a long afterlife as evidence of an unusually principled Scottish rejection of slavery in early America. The original records make the history harder to compress into that account. The moral language is there, and it should not be explained away. But it is the fifth of five arguments. The first four concern Spanish policy, the

comparative value of white labour, the financial risk of buying enslaved people, and the danger of maintaining a potentially hostile enslaved population on an exposed military frontier.

The petition closes by asking for help not for the sake of the enslaved but “for our own Sake, our wives & children, & our Posterity”. The same archive shows that a substantially larger group in Savannah had already petitioned for permission to use enslaved Africans. Some of the organisers of that campaign were themselves Scots.

One of the eighteen Darien signatories, Alexander Munro, later swore that he had been induced to sign a paper without knowing what it contained and only afterwards concluded that it was the petition subsequently published by the Georgia Trustees. His statement came from the bitter political struggle over the government of Georgia and cannot be treated as proof that the petition was fraudulent, or that the other seventeen men did not support it. It does, however, prevent the surviving sheet of signatures from being treated as uncomplicated evidence of eighteen identical motives.

The Darien petition was a real objection to the introduction of slavery. It contained genuine moral language. It was also written inside a struggle over land, labour, imperial defence and the economic future of Georgia, while enslaved people were themselves crossing the frontier to Spanish Florida in search of freedom.

## Georgia Had Already Banned Slavery

The argument began before the Darien petition was written. Georgia was established as the last of Britain's mainland North American colonies, and in 1735 its Trustees secured an act prohibiting the importation and use of enslaved Black people. The title itself stated the principal official purpose: "An Act for rendering the Colony of Georgia more defensible by prohibiting the Importation and Use of Black Slaves or Negroes into the same."

Georgia's prohibition was not simply an eighteenth-century version of the abolitionism that would emerge much later. The Trustees wanted a colony of small white landholders, supported by European indentured labour, that could also serve as a defensive barrier between the richer plantation colony of South Carolina and Spanish Florida. They feared that a large enslaved population would reduce the number of white settler-soldiers, encourage large plantation estates, create the possibility of revolt and give Spain a population whose desire for freedom could be used against Britain.

That strategic reasoning did not exclude moral opposition. Oglethorpe's own correspondence shows that the two existed together. In a letter of 17 January 1739, only a fortnight after the Darien petition, he told the Trustees that permitting slavery would violate the principles on which Georgia had been established and would cause the "misery of thousands in Africa" by encouraging people to be bought and carried into perpetual slavery.

The evidence shows several arguments operating at once: humanitarian objection, a preference for white smallholders, fear of rebellion and escape, military planning, and an economic model deliberately different from neighbouring South Carolina.

## The Savannah Petition Came First

The immediate trigger for the Darien document was a representation drawn up in Savannah on 9 December 1738. Its supporters wanted two fundamental changes. They sought stronger private ownership of land and permission for "the use of Negroes with proper limitations".

The two demands belonged together. The pro-change settlers argued that Georgia could not compete with South Carolina while Carolina planters had access to enslaved labour and Georgians did not. Land that could be bought, sold and inherited more freely would also support a different kind of agricultural economy from the smallholdings envisaged by the Trustees.

The scale of the Savannah representation was considerably larger than the Darien response. An abstract preserved in the Hargrett papers counts 36 Savannah freeholders who had been sent to Georgia at the Trustees' expense, another 44 Savannah freeholders, seven freeholders elsewhere who had been sent at the Trustees' expense, 11 other freeholders outside Savannah, and 21 subscribers not known to be freeholders. That total is 119. Some later histories give 121 signatories, so the safest description is that the surviving Hargrett tally records 119 while later accounts commonly report 121.

The organised faction became known as the Malcontents. The New Georgia Encyclopedia describes it as composed primarily of Scottish settlers around Savannah, with the Scottish physician Patrick Tailfer among its leaders. Tailfer opposed the restrictions on both landholding and slavery.

That single fact makes a national interpretation of the Darien petition impossible. This was not a dispute between Scots and non-Scots. Scots were prominent on both sides. Highland settlers at Darien were signing against the introduction of slavery while Scottish settlers around Savannah were helping lead the campaign to permit it.

## What the Eighteen Men at Darien Actually Said

The Darien petition, preserved in the Hargrett Rare Book and Manuscript Library and available through the Digital Library of Georgia, was dated 3 January 1738/9 under the dating convention then in use. In modern dating it is 3 January 1739. The surviving transcription contains eighteen signatories, not twenty as some retellings have stated.

Its five arguments deserve to be read in sequence because the sequence reveals the world in which it was written.

The first was geographical and military. The settlers pointed to the proximity of Spanish territory, where people escaping British slavery had been promised freedom. Buying enslaved workers, they argued, would require so much guarding against escape that the cost of supervision could exceed the value of their labour.

The second was a claim about labour. The Darien settlers described themselves as accustomed to work and argued that a white man employed for a year could be more useful than an enslaved African. It was not an argument for racial equality. It was an argument that the colony did not need plantation slavery in order to survive.

The third was financial. Darien's settlers said they were not rich. If a man borrowed money to buy an enslaved person who then escaped or died, the purchaser could be ruined by the debt. Their language turned the point into a bitter comparison: the indebted owner might become, in their words, more enslaved to the merchant than the person he had bought was to him.

The fourth returned to security. The settlers warned that slaveholding would require a permanent internal guard as well as vigilance against Spain. Their fear was expressed in stark terms: an enemy outside the colony and another "in our bosom". It is one of the passages that most clearly exposes the petition's racial assumptions and the settlers' expectation that people held in bondage might resist those holding them.

Then came the fifth clause. It is the passage most often extracted from everything around it, but it is also stronger than a mere expression of inconvenience. The petition says that sentencing any race and its descendants to perpetual slavery is "Shocking to human nature". It recognises the enslaved person's attachment to liberty, saying that freedom must be as dear to them as to the petitioners. It then imagines a future violent reckoning if that freedom continued to be denied.

The document therefore does not support two easy readings. It cannot safely be reduced to a purely humanitarian manifesto, because four of its five numbered arguments and its closing appeal are rooted in the interests and security of the settlers. But neither can its humanitarian language simply be dismissed as an afterthought. The archive establishes what was written; it does not tell us that the men who signed it regarded its fifth argument as unimportant.

## Spanish Florida Made the First Argument Real

The Darien settlers' reference to Spain was not speculative. It described a frontier policy already changing the lives of enslaved people in British North America.

In 1693, King Charles II of Spain issued a decree offering freedom and protection to enslaved Africans who escaped from British territory, accepted Catholicism and served Spain. Further decrees in 1733 reinforced the policy. Enslaved people did not merely hear of that promise; they acted on it, leaving British plantations and making their way towards St Augustine.

By 1738, the year before the Darien petition, Spanish governor Manuel de Montiano had established Gracia Real de Santa Teresa de Mose, usually known as Fort Mose, about two miles north of St Augustine. The National Park Service describes it as the first legally established free African settlement in what is now the United States. Around one hundred people lived there, including a militia of free Black men whose military service formed part of Spain's defence of Florida.

From the British side of the border, Spanish sanctuary was an imperial threat. From the perspective of the people escaping slavery, it was an available route towards liberty. Both realities belong in the history. The Spanish Crown had strategic reasons to weaken Britain's plantation colonies; the freedom seekers had reasons of their own for crossing the frontier.

When the Darien petitioners wrote that the neighbouring Spaniards had "proclaimed freedoms" to people who escaped their enslavers, they were describing an existing system, not imagining a hypothetical one.

## **Eight Months Later, Stono**

The timing gives the Darien petition another dimension. Eight months after it was signed, on 9 September 1739, the Stono Rebellion began in South Carolina.

A group of enslaved people armed themselves and moved through the countryside, gathering others as they went. National Park Service accounts describe the rising as the largest slave uprising in Britain's mainland colonies before the American Revolution. The group moved south, apparently intending to reach Spanish Florida, and shouted for liberty as it advanced. The number involved rose to scores and may have reached about one hundred before colonial forces suppressed the rebellion.

It would be misleading to say the Darien settlers predicted Stono. There is no evidence that their petition anticipated a particular revolt eight months later. What the chronology does show is that the conditions behind their first and fourth arguments were immediate. Spanish sanctuary, escape, armed resistance and frontier warfare were not remote possibilities in the southern colonies of 1739.

Stono also makes it especially important not to describe Spanish policy only as something done to manipulate enslaved people. Those who escaped towards Florida and those who rose at Stono were actors in the history. They were attempting to change their own condition, using the divisions between European empires where those divisions created an opening.

## **A Dossier Against the Pro-Slavery Petitioners**

The papers surrounding the two petitions show that the argument was already being fought as a political campaign.

In the Hargrett volume is a long document headed "Character of the Persons who Sign'd the Representation for Negroes 9 Dec. 1738." It proceeds through the Savannah subscribers one by one, recording information about property, cultivation, occupation, debts and behaviour. Some entries are descriptive. Others are plainly hostile.

Patrick Tailfer, the Scottish physician who became one of the Malcontents' best-known leaders, is described

as the “Ring leader for Negroes, and change of Tenures”. Other subscribers are attacked for debt, disorderly behaviour, poor judgement or personal disputes. Merchant Robert Williams is accused of encouraging the campaign because he expected to profit from supplying enslaved people and, through debt, to acquire settlers’ land.

The document closes under the name of William Norris, the clergyman sent to Georgia by the Trustees in 1738. It should not be read as a neutral catalogue of biography. It was a dossier produced inside a political fight, and allegations about individual motives are allegations rather than established facts.

Its importance lies elsewhere. It shows the intensity of the conflict and the methods being used. The argument over slavery was also an argument over who was credible, who was solvent, who had improved his land and who stood to gain economically from a change in policy. Supporters of slavery accused the Trustees of obstructing Georgia’s prosperity. Their opponents scrutinised and attacked the character and interests of the men demanding change.

## Did Every Darien Signatory Know What He Was Signing?

The most difficult evidence came later from Alexander Munro, one of the eighteen men whose name appears on the Darien petition.

In a sworn statement subsequently published with the Malcontents’ case against the Trustees, Munro described severe disillusionment in Darien in late 1738. He said settlers had considered leaving collectively for South Carolina after struggling to make a living. According to his account, Oglethorpe responded with promises of assistance if they remained, including provisions, cattle and a breeding mare.

Munro then alleged that he was called to John McIntosh More’s house and told that men who signed a paper would receive cattle, servants and Oglethorpe’s favour, while those who refused would fare badly. He said he signed without knowing the paper’s contents. Only afterwards, he claimed, did he learn that the document was the petition from the eighteen published by the Trustees, at which point his conscience troubled him.

This evidence has to be handled with restraint. Munro’s statement emerged from a deeply factional dispute, and the Malcontents had an obvious interest in undermining a document the Trustees were using against them. His account does not establish that all eighteen signatures were obtained in the same circumstances. It does not prove that the humanitarian clause was fabricated, or that the other men rejected it. Nor does it erase the petition itself.

It does establish that at least one named signatory later disputed the circumstances in which his name had been obtained. Modern scholarship has therefore treated the Darien petition not simply as a transparent statement of collective conscience but as a document produced inside a contested political campaign. Harvey H. Jackson examined the question directly in his 1977 study, “The Darien Antislavery Petition of 1739 and the Georgia Plan”, while later work on colonial Georgia has continued to cite Munro’s deposition when discussing the episode.

## The Trustees Used Darien’s Petition

The Darien document mattered in London because it gave the Trustees an answer to the Savannah representation. The pro-slavery faction could claim that Georgia’s inhabitants were being held back by rules imposed from Britain. The Trustees could point to Darien and say that colonists themselves were asking for the prohibition to remain.

Trustee correspondence praised the Darien petition and used opposition from Darien and elsewhere to

reinforce the existing policy. In their response to the campaign for change, the Trustees presented the restrictions on slavery and the alienation of land as safeguards for the colony's system of liberty and property.

Darien was not the only settlement to oppose slavery. The German-speaking Salzburgers at Ebenezer also presented objections in 1739. Their ministers argued from their own experience that white settlers could work successfully in Georgia and asked that enslaved labour not be introduced into their district. Their reasoning, like Darien's, mixed religion, economics, labour and fear of the consequences of enslavement.

The colony was therefore divided more intricately than a simple story of one heroic community standing alone. Savannah's Malcontents were pressing for plantation labour and freer landholding. Darien's Highland settlers were formally opposing them. Ebenezer's Salzburgers also resisted slavery. The Trustees were using those local objections to defend a colonial model under growing pressure.

## The Prohibition Began to Collapse

The policy did not survive.

By the late 1740s the Trustees were conceding that the ban had become increasingly difficult to enforce. Their 1749 correspondence records a decision to petition the Crown for repeal of the 1735 act and to prepare a replacement under which enslaved Africans could be admitted subject to restrictions.

Even at that stage the old military fear remained. The Trustees wrote that they could "never lose Sight" of Georgia's position as a frontier. They worried about a large imbalance between Black and white men and about the ease with which enslaved people might escape to St Augustine. One proposed regulation required an indentured white male servant for every four enslaved Black males over the age of fourteen.

Events had already overtaken the law. A 1750 census found 202 Black men, 147 Black women and an uncounted number of children in a total Georgia population of about 2,500. That placed the Black population at roughly 17 per cent even before the old prohibition was fully replaced.

Legislation permitting slavery took effect in 1751. Georgia's experiment as the only British mainland colony to prohibit Black slavery as a matter of public policy was over.

## Darien Entered the Plantation Economy It Had Once Resisted

The longer history brings the argument back to the place where the eighteen names were written.

John McIntosh Mor was the leading Highland figure at Darien and one of the men associated with the 1739 petition. His son George McIntosh later lived at Rice Hope, a rice and indigo plantation. A Georgia Historical Society marker records that when British forces attacked during the American Revolution they burned the house and carried off McIntosh's enslaved people and livestock.

The son's slaveholding cannot be projected backwards onto his father. It tells us nothing certain about what John McIntosh Mor privately believed in January 1739. It does show how completely the economic environment surrounding the family changed once Georgia abandoned the prohibition.

The transformation extended far beyond one household. During the antebellum period, rice and Sea Island cotton plantations made McIntosh County one of the wealthier parts of the South Atlantic coast. More than six million pounds of rice were shipped from the Altamaha delta in 1859. On nearby Sapelo Island, Thomas Spalding and his children held 385 enslaved labourers in the 1850s.

That is the long historical distance between the Darien petition and the society that followed it. In January 1739, eighteen Highland settlers signed a document warning that hereditary slavery was contrary to human nature, economically dangerous and potentially catastrophic for a frontier colony. Within little more than a decade, Georgia had authorised slavery. In the generations that followed, the district around Darien became deeply integrated into a plantation economy sustained by enslaved labour.

The archive therefore gives no support to a simple national legend in either direction. It does not show that “the Scots” rejected slavery: Scottish settlers were conspicuous among the campaigners demanding it. It does not show that Darien’s moral language was meaningless: the petition plainly condemns perpetual slavery, and Oglethorpe separately wrote of the misery the trade would inflict on Africans. It does not show that all eighteen signers approached the document in the same way: Alexander Munro later said he had signed without knowing its contents.

What survives is more useful than a legend. It is a record of people arguing over a system that was not yet fixed in Georgia: over who would own the land, who would work it, how the colony would be defended, who would profit, and what freedom meant when people held in bondage could see another imperial jurisdiction across the frontier offering a route out.

The words “Shocking to human nature” belong in that history. So do all the words around them.

## Sources

- Letters from Georgia, v. 14203, 1737 June–1739 January — Trustees for Establishing the Colony of Georgia in America; Hargrett Rare Book and Manuscript Library, University of Georgia Libraries, via Digital Library of Georgia; original records 1737–1739. Digital Library of Georgia.
- The Colonial Records of the State of Georgia: Entry Books of Commissions, Powers, Instructions, Leases, Grants of Land, Etc. by the Trustees, 1732–1738, Volume 32 — University of Georgia Press; open-access reissue 2021; includes records of the 1735 prohibition on Black slavery. University of Georgia Press.
- Trustees’ Letter Book, 1738–1745, Volume 30 — Colonial Records of the State of Georgia, University of Georgia Press; open-access reissue 2021. University of Georgia Press.
- Trustees’ Letter Book, 1745–1752, Volume 31 — Colonial Records of the State of Georgia, University of Georgia Press; open-access reissue 2021. University of Georgia Press.
- “The Darien Antislavery Petition of 1739 and the Georgia Plan” — Harvey H. Jackson, *The William and Mary Quarterly*, Vol. 34, No. 4, October 1977, pp. 618–631. JSTOR.
- “Liberty and Slavery in Colonial America: The Case of Georgia, 1732–1770” — Andrew C. Lannen, *The Historian*, Vol. 79, No. 1, Spring 2017, pp. 32–55. Taylor & Francis.
- Scottish Highlanders in Colonial Georgia: The Recruitment, Emigration, and Settlement at Darien, 1735–1748 — Anthony W. Parker, University of Georgia Press, 1997. JSTOR.
- “Malcontents” — New Georgia Encyclopedia, originally published 14 February 2003; last edited 29 September 2020. New Georgia Encyclopedia.
- “Slavery in Colonial Georgia” — Betty Wood, New Georgia Encyclopedia, originally published 19 September 2002. New Georgia Encyclopedia.
- “African Americans in St. Augustine, 1565–1821” — National Park Service; accessed 1 October 2026. National Park Service.
- “Stono Rebellion” historical material — National Park Service; accessed 1 October 2026. National Park Service.

Service.

- Detailed Reports on the Salzburger Emigrants Who Settled in America, Volume Six, 1739 — Johann Martin Boltzius and Israel Christian Gronau; University of Georgia Press edition, 1981; open-access reissue. Digital Library of Georgia.
  - A Southern Underground Railroad: Black Georgians and the Promise of Spanish Florida and Indian Country — University of Georgia Press; open-access edition, 2023; Chapter 1 and notes, including the 1750 Georgia census. University of Georgia Press.
  - “Rice Hope” — Georgia Historical Society historical marker, erected 1957; accessed 1 October 2026. Georgia Historical Society.
  - “McIntosh County” — New Georgia Encyclopedia; accessed 1 October 2026. New Georgia Encyclopedia.
  - “Sapelo Island” — New Georgia Encyclopedia; accessed 1 October 2026. New Georgia Encyclopedia.
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TEA WITH GUNNS | 1 October 2026

# Artificial Intelligence Is Coming for Humanity, Just After It Finishes This Email

Read online: <https://modern.scot/artificial-intelligence-is-coming-for-humanity-just-after-it-finishes-this-email/>



I discovered this week that British workers are spending an estimated £958 million of their own money every year on artificial intelligence to help them do their jobs, which is not how I remember employment working when I first encountered it. In those days you went somewhere, they gave you work, you complained about it quietly, and at the end of the week they gave you money. We appear to have modernised the arrangement. Now they give you the work, and you

secretly pay AI to do it. You are essentially the middleman. This is known as “shadow AI”, which improves the whole thing enormously because it makes an office manager sound as though they are running an intelligence operation out of the stationery cupboard.

Somewhere in Scotland there is undoubtedly a woman who has worked for the same council since 1997, owns three cardigans in varying shades of blue and has secretly become an advanced technology operation. Management thinks she has simply become better at correspondence. In reality, Barbara in Payroll has gone underground.

I first realised artificial intelligence had infiltrated my life when Effie declined tea. Effie has been declining tea successfully for years without technical assistance. She has declined because the washing was out, because the washing was in, because a parcel was coming, because she had put something in the oven, because the weather looked wrong and, on one memorable afternoon, because she had taken her boots off and felt the day's events had therefore reached their natural conclusion. Then one day I received four paragraphs thanking me warmly for including her, regretting that prior commitments prevented her attendance and expressing the hope that we might reconnect at another mutually convenient time. It finished by wishing me a productive and fulfilling afternoon.

That was the giveaway. Effie knows perfectly well I have never had a productive and fulfilling afternoon. I have had afternoons in which things have happened, but that is not the same thing. One particularly successful afternoon resulted in a clean freezer. Another ended with all the towels in the same cupboard. These are not achievements on which one builds a reputation. I later discovered that Effie had asked artificial intelligence to decline the invitation because she simply did not fancy coming out, and I admired this enormously. Technology has spent decades promising to transform the human condition and has finally found its proper purpose: helping a Scottish woman avoid telling her friend she would rather stay home in her slippers.

The unsettling part was how much the AI had improved her. The real Effie is warm, funny and entirely capable of ending a message with two kisses despite having forgotten to include a verb. AI Effie sounded as though she had recently completed a course in stakeholder relations. Once I noticed this, I began looking more closely at other messages and realised that artificial intelligence is already everywhere. People who have known me for twenty years are suddenly “reaching out”. Now everybody appreciates my patience, values my

understanding, hopes I am well, looks forward to reconnecting and wishes to ensure alignment. I do not wish to be aligned. At my age, if both knees are pointing in approximately the same direction I consider the day a success.

The great attraction of artificial intelligence seems to be that it can translate what we actually think into something fit to send to another human being. Most genuine thoughts are remarkably efficient: I sent you this last week. No. You have the wrong person. I already paid that. Please stop emailing me. The AI takes these sturdy little sentences and puts cushions around them until you are no longer annoyed that somebody has ignored your previous three messages; you are grateful for the opportunity to clarify. This may be a greater threat to Scottish life than anyone realises because we are a nation built upon carefully controlled irritation. Remove that and nobody knows where they stand.

Elspeth has apparently been using artificial intelligence for difficult emails for months, which I should have suspected because her messages have recently acquired bullet points. Elspeth is not naturally a bullet-point woman. She once wrote a shopping list in a circle around the edges of an envelope because there was a telephone number in the middle she did not want to disturb. Yet suddenly she is producing concise summaries, proposed next steps and courteous follow-ups. I had assumed retirement had given her time for personal development. It turns out she has ChatGPT.

Margaret has not yet entrusted anything important to artificial intelligence, but she has tested it, which in Margaret's case means asking it questions to see when it will make a fool of itself. She began with recipes. The machine offered substitutions, suggested improvements and at one point proposed altering something she has made in exactly the same way for more than thirty years. Margaret regarded this as an act of considerable nerve. There are areas of life where new information may be welcome, but advising a woman to rethink her traybake after three decades of successful church tables is not innovation. It is provocation.

Agnes has used artificial intelligence to complain about a vacuum cleaner, which I found particularly interesting because the vacuum cleaner had only one fault. It did not vacuum. There are products whose failures require explanation. A boiler can make noises. A car can develop a mysterious lurching. A television can have sound but no picture, picture but no sound, or both. A vacuum cleaner has a simpler agreement with humanity: there are crumbs, and it removes them. Agnes's did not. Artificial intelligence nevertheless transformed this straightforward commercial dispute into a gracious statement of disappointment and a desire to explore an appropriate resolution. The company sent instructions explaining how to clean the filter. Agnes wanted her £189 back. AI had turned a refund request into couples counselling.

There is a lesson in this because sometimes anger is efficient. We have spent years teaching ourselves that every communication must be calm, measured, reasonable and constructive, but there are moments when the most useful thing a person can say is "see you next Tuesday." Artificial intelligence may eventually make us so polite that nothing is ever resolved because nobody can tell whether anyone is actually dissatisfied.

Jean immediately saw the potential for dealing with family group messages. Every family has one. The message begins innocently with somebody asking what time lunch is, and within minutes there are seventeen notifications. Somebody wants to know whether two o'clock means arriving at two or eating at two. Somebody else wants to know if there will be potatoes. An aunt who has not yet said whether she is coming announces that she does not like parsnips. A cousin asks whose house it is despite the address appearing six messages above. Then somebody sends a photograph of a dog. If artificial intelligence can take over this work, the country may recover several points of GDP before Christmas.

Morag remains less impressed. Living on an island part of the year gives a person a healthy relationship with technological certainty. She has seen websites confidently describe services as operating normally while

standing on an island looking at the stretch of water where the ferry ought to be. I trust Morag's judgement on these matters. Anything that claims to remove uncertainty has never had to get somewhere from an island in February.

Rhona, on the other hand, is the reason I discovered that artificial intelligence can now attend meetings. She had come across one of the systems that listens to the entire thing, makes notes, produces a summary and identifies action points. This is regularly presented as useful. I regard it as an attack upon civilisation. Meetings work because the minutes bear only a distant relationship to human events, and this is one of the foundations of organised society.

A forty-minute disagreement becomes "discussion followed". Somebody announcing that the whole proposal is nonsense becomes "concerns were noted". Three people talking over one another becomes "a range of views was expressed". A committee member threatening to resign because nobody has collected the raffle prizes from her garage becomes "storage arrangements remain under review". This is not dishonesty. It is mercy. Rhona could see the efficiency of having the notes produced automatically. I could see only the danger of creating a permanent record of things everybody present had already agreed, silently and wisely, to forget.

Unfortunately I then made the mistake of reading what the experts think comes next. There are serious people considering a future in which artificial intelligence is woven into almost everything around us. It may help monitor our health, organise our work, influence our decisions and become such a constant assistant to human thinking that we are no longer the only intelligence in the room. By 2040, some expect AI to sit behind so many ordinary objects and decisions that much of its work may happen without us consciously noticing. Our lives could become more programmed. It might know how we sleep, what we eat, how we work and possibly who we ought to date. I had only just become accustomed to the kettle knowing when it was boiling. Now apparently it's little blue light may eventually have views.

This concerns me because several electrical items in my house already behave as though they possess independent judgement. The printer has had strong opinions for years. The television occasionally announces there is no signal while visibly showing me a programme. The washing machine once locked my towels inside for forty-five minutes and refused all negotiation. None of these things possesses intelligence at present, and I do not see why we would reward that behaviour by giving them any.

Some experts also imagine AI becoming something like a constant partner in human thought, helping to check, expand and organise ideas. This has been described in impressive terms involving collective intelligence and collaboration between people and machines. I know what it will be called in my house. Interfering.

I do not want a collective mind while I am making soup. I barely want another person in the kitchen. There are certain decisions that should remain between a woman and whatever she has found in the vegetable drawer.

Margaret agrees with me on this point, although for different reasons. Her concern is that AI will begin believing its advice is superior. She has already seen this with satnavs, which issue instructions in the tone of someone who has never encountered a tractor on a single-track road. She sees no reason to expand the principle into the rest of domestic life. A refrigerator that knows what is inside it sounds useful until it begins commenting on the unhealthy desserts.

The more alarming debate concerns artificial superintelligence and whether systems far beyond human ability could eventually become difficult or impossible to control. Some scientists and technology specialists regard this as a serious risk; others argue that present systems are nowhere near that point and that more immediate problems such as jobs, misinformation and environmental costs deserve the greater attention. This is one of those subjects where I find myself looking for the middle option between "everything will be

fine” and “human civilisation may end”.

Unfortunately there does not appear to be a checkbox for that.

What fascinates me is the difference between the conversation at the top and what ordinary people are doing at the bottom. Scientists are discussing whether artificial intelligence could transform human consciousness, while Effie has discovered that she can photograph the contents of her refrigerator and ask a machine what she can make for dinner, then reject every suggestion until it eventually arrives at toast.

Researchers are considering whether machines could one day become more intelligent than humanity, while Elspeth has spent twenty minutes asking one to identify a mystery key she found in the kitchen drawer, despite there being no conceivable way for the computer to know what lock it belongs to.

Margaret has finally asked it what the “Eco” button on her dishwasher does after fourteen years of refusing to press it, only to decide that a four-hour cycle is ridiculous and continue not pressing it.

Jean has discovered that artificial intelligence can plan routes and is now attempting to develop one through the supermarket that avoids everyone she knows while still passing the reduced shelf.

Rhona photographed a recent grocery receipt and asked the machine to explain how she had spent £47.62 while apparently buying nothing, which may be the first genuinely impossible problem placed before artificial intelligence.

This is, I suspect, how civilisation will actually respond to revolutionary intelligence: give humanity access to the accumulated computational power of the age and within a fortnight somebody will be asking the most advanced intelligence humanity has ever created if it can distinguish beef stew from something frozen during lockdown.

The danger of the meeting assistant became personal when I realised one of these systems could theoretically attend tea. Our gatherings have operated successfully for years because nothing is documented. We have no agenda, no minutes and no defined purpose. There is occasionally a three-tier cake stand when somebody has ambitions. Matters develop naturally. One minute we are discussing the price of butter and the next we are examining the moral character of a woman in Inverness. Nobody knows how we got there. This is the beauty of it.

Artificial intelligence would immediately attempt to impose order. It would identify themes, and recent gatherings would probably have been classified under household maintenance, local government, deteriorating joints, supermarket pricing, ferry reliability and people who park badly. Rhona pointed out that a proper system could also identify who had agreed to do what, which only confirmed my worst fears. Our entire arrangement depends upon no one being able to prove that anybody agreed to anything.

Jean has been waiting since spring for Margaret to return a plastic container. At present this is simply part of the natural migration of Tupperware through Scottish society. Margaret maintains, quite reasonably, that several containers are currently in circulation and nobody has established beyond doubt which one is Jean’s. An artificial intelligence system would probably search the minutes, identify ownership, assign a deadline and create a follow-up reminder. A friendship that has survived years could be destroyed by database accuracy.

Effie has announced several times that she is reducing her sugar intake, and no human present has been unkind enough to correlate this statement with the shortbread. A machine might. Margaret occasionally undertakes to bring something the following week and then quite reasonably decides that nobody can remember what it was. Rhona’s meeting assistant could remember. This is precisely why it must never be invited.

Then the programme would produce a summary, and nobody wants a summary of tea. Tea should disappear behind you like weather. I do not wish to receive an automated email at six o'clock informing me that participants discussed wheelie bins, butter prices, or seasonal ailments. Nor do I want a list headed "Next Steps" informing me that Jean will bring milk and I have responsibility for biscuit provision. There must be parts of human life where nothing is captured.

This, I suspect, is where some of the more serious warnings about artificial intelligence become easier to understand. The concern is not simply that machines become clever. It is how much judgement, attention and responsibility human beings may quietly hand over because AI is convenient. I have already surrendered multiplication to the calculator. I no longer know anybody's telephone number. I once drove twelve miles in the wrong direction because a pleasant woman inside the dashboard told me to. Convenience has an excellent record against human resolve.

If a machine eventually knows my diary, my shopping, my health, my route home, my preferred biscuits and which messages I cannot be bothered answering myself, the great technological takeover may not require force. That is why the £958 million suddenly looks rather different. Perhaps artificial intelligence is not coming to steal our jobs. Perhaps we are paying its bus fare.

I have decided not to worry unnecessarily because every generation is told that technology will save time, and it never does. The washing machine saved hours of washing, so we bought more clothes. The dishwasher saved washing-up, so we acquired seventeen mugs per person. Email made correspondence instantaneous, so we started sending messages all day. Mobile phones meant nobody ever had to wait beside a telephone again, so now everybody is expected to answer the telephone everywhere. Artificial intelligence will save us from writing emails, and I have no doubt we will use the spare time to create more very human problems.

Effie has stopped using AI to decline invitations from me. Yesterday her message arrived shortly before lunch. It contained no greeting, no appreciation, no regret, no bullet points and no desire to reconnect at a mutually convenient time. There was no punctuation. She had the hairdresser. She could not make tea. There were two kisses.

It was unmistakably Effie, and if humanity is going to survive artificial intelligence, I think bad grammar may be where we begin.

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