TRANSPORT SCOTLAND
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Draft Public Sector Fleet Decarbonisation Action Plan

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Ministerial Foreword

The public sector has a critical role in reducing greenhouse gas emissions, Scotland's just transition to a low-carbon economy and preparation for the future climate. Public bodies have an important leadership role to play as bodies with significant buying power and as trusted messengers.

I am delighted to present this draft Public Sector Fleet Decarbonisation Action Plan developed through engagement and collaboration with the public sector. It aims to help public bodies minimise their fleet emissions and achieve full road decarbonisation by 2040. It sets out a series of strategic and short-term actions that should be taken by public bodies leaders, senior management, fleet managers, sustainability leads & procurement specialists, and the Scottish Government to meet both the CCP 2040 target for road vehicles but also the intermediate 2035 fleet emission reductions target proposed in this Action Plan.

By 2040 public bodies are expected to save £87 million by transitioning to electric and taking advantage of cheaper fuel prices and maintenance costs. Accelerating this transition is an essential part of sheltering them from volatile fossil fuel costs - those that can decarbonise earlier and faster, particularly fleets with light vehicles, should do so now.

While this Action Plan is primarily focused on reducing greenhouse gas emissions, it will also deliver public health benefits due to the resulting better air quality, including reductions in nitrogen dioxide and particulate matter, especially in urban areas. This is relevant in supporting the operation and effectiveness of Low Emission Zones in Scotland and wider Cleaner Air for Scotland objectives.

This will not be possible without a genuine openness and willingness to collaborate. Partnerships to share both vehicles and infrastructure will bring efficiencies and opportunities for fleet and operational rationalisation, including potential new revenue streams, and, importantly, create opportunities to partner with the private sector, whilst reducing both cost and carbon emissions.

Stephen Flynn MSP

Cabinet Secretary for Economy, Tourism and Transport

Background – Public Sector Fleet

In Scotland over 100 public bodies, out of over 240, collectively operate over 33,000 vehicles (referred to here as the public sector fleet) - this includes the Scottish Government and its agencies, local government, NHS Scotland, emergency services, higher education bodies, as well as public bodies delivering specific services on behalf of the Scottish Parliament or Scottish Ministers.

The public sector fleet is diverse and includes vehicles that are owned or leased ranging from motorbikes and cars to fire appliances, ambulances, and refuse collection vehicles. It accounts for at least 14% of Scottish heavy goods vehicles (HGVs), expressed as a body type. The largest proportion of fleet vehicles are operated by local authorities, followed by blue light emergency services and health bodies.

A survey of the public sector fleet in 2025 highlighted important progress in fleet decarbonisation, identifying several public bodies that have made significant progress in decarbonising their fleets. Eleven public bodies have now transitioned between 75% and 100% of their fleet to zero-emission vehicles, with three of these now operating fully zero-emission fleets. The survey indicated that 23% of the fleet is now zero-emission, including 50% of cars and 17% of vans (see Table 1 below).

Table 1 – Zero-emission vehicle adoption in the public sector fleet

Vehicle Type (registered road vehicles)	2020 % Zero-emission	2023 % Zero-emission	2025 % Zero-emission
Passenger Cars	11%	36%	50%
VAN – 3.5 Tonnes and under	4%	14%	17%
Total Fleet (All Vehicles)	5%	17%	23%

Note: (no fleet survey was conducted in 2021. 2022 and 2024 survey results not shown)

The results of the 2025 public sector fleet are provided in **Annex 2.**

While zero-emission technology is currently available and used by the public sector for lighter vehicles like cars and vans and for many heavier vehicles, suitable technological solutions for some long distance or more specialised public

sector vehicles are not yet widely available. Where zero-emission heavy or specialist vehicles are available, they often come at a significantly higher purchase cost compared to fossil fuel equivalents, although when considered over their full lifetime they may be cost effective, especially when oil price volatility is taken into account. Individual modelling of routes and applications is required to understand where investing in zero emission is most effective. Where specialist vehicles are currently made only as prototype or low-volume production models, uptake has been limited to date.

The 2019 Programme for Government (PfG) established stretching targets specific to the decarbonisation of public sector fleets in stages and based on vehicle type. These targets were also incorporated into the 2020 Climate Change Plan update, which reflected zero-emission vehicle (ZEV) technology available at the time as well as technology developments anticipated over the coming years. Over the past five years limited availability of certain ZEV models and higher upfront costs for many types of ZEVs have negatively impacted their adoption.

In addition to operating fleet vehicles leased or owned, the public sector also relies on car clubs, short term vehicle rentals, contracted fleet services, and employees using their own vehicles for business purposes (the “grey fleet”) to deliver its services. Although not part of the public sector fleet, public bodies tend to have less direct control over grey fleet vehicles, but these still contribute to fleet transport emissions.

Introduction

The vast majority of public bodies in Scotland are covered by the Climate Change (Scotland) Act 2009 (‘the 2009 Act’) which places statutory climate change duties on them. In exercising their functions, public bodies must act in the way best calculated to contribute to national emissions reduction targets and to help deliver the National Adaptation Plan, and act in the most sustainable way.

Since 2015-16, relevant public bodies have been required to report annually on their compliance with the climate change duties, under section 46 of the 2009 Act and The Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015, as amended.

The Sustainable Scotland Network (SSN) has also since 2015-16 managed the annual climate change duties reporting and publishes an annual analysis report that summarises emission reductions and highlights climate action across Scotland’s public sector.

The SSN 2024-25 analysis report under scope 1 emissions ranked fleet emissions as the second largest source of direct emissions across the public sector. Fleet emissions increased by 2% since the previous 2023-24 reporting period, and have increased by 8% since 2015/16. Whilst the proportion of zero-emission vehicles operating in the public fleet is increasing, this increase, at least in part, reflects the need for larger public fleets to deliver services for a growing population and housing stock across Scotland. The SSN analysis report also notes that national targets for decarbonisation of fleets have been adopted by 17% of public bodies in 2024-25 and there is only limited evidence that emission targets are informing budgets and resource planning.

In 2022 a more comprehensive survey of the public sector fleet found that only 67% of bodies indicated that they had in place a fleet strategy to ensure procurement of zero-emission vehicles to meet the 2019 PfG commitments. The most recent survey, undertaken at the end of 2025, is consistent with the fleet decarbonisation conclusions in the SSN report and highlights that decarbonisation of the public sector fleet has slowed over the past two years (Refer Table 1 above). In addition, the 2025 survey confirms that the 2019 public fleet targets associated with phasing out petrol and diesel cars by 2025 and only purchasing zero-emission light commercial vehicles from 2025 has not been met at the end of 2025.

The 2026 Climate Change Plan (CCP) sets out the policies that the Scottish Government will take forward to meet its carbon budgets between 2026-2040. In doing so, the CCP sets out a pathway towards Scotland achieving net zero by 2045.

The CCP includes in its Annex 2, under outcome 4, the target to phase out the need for new petrol and diesel cars and vans by 2030 and, under outcome 5, the commitment to work with the energy, finance and road transport sectors and related businesses to ensure all road vehicles are zero emission by 2040. This Action Plan delivers Policy 4 of Outcome 4 of the CCP: Develop a Public Sector Fleet Decarbonisation Action Plan, developed in partnership with public sector fleet operators, including identifying new delivery models that crowd in private investment and for the sharing of vehicles and infrastructure with fleet decarbonisation costs incorporated into business-as-usual fleet operations.

New statutory guidance for public bodies, provided for under section 45 of the Climate Change (Scotland) Act 2009 (“the 2009 Act”), was published in March 2026 and aims to support bodies in putting the climate change duties into practice. Public bodies are required, under law, to have regard to this guidance. The guidance notes the need for bodies to develop appropriate targets, strategies and plans to decarbonise their assets and operations, including fleet.

Since 2014 the Scottish Government has been working with the public sector to support decarbonisation of their fleet, providing over £80 million of funding for zero and ultra-low emission vehicles and associated infrastructure to public bodies.

Forecasting done by EST in April 2026 reveals an additional purchase price cost of £486 million up until 2040 for the entire public sector fleet, and a total spend of £172 million for the required electric vehicle charging infrastructure. However, these absolute costs do not account for the total cost of ownership savings the fleet can benefit from, nor the positive impact of decarbonisation in terms of vehicle emissions. As such by 2040, the fleet can expect to save £87 million by transitioning to electric and taking advantage of cheaper fuel prices and maintenance costs. Proportional to the total combined additional cost of the electric vehicles and infrastructure upfront, the expected total savings over the ownership period of the new electric fleet is approximately 13% compared to not transitioning.

This draft Public Sector Fleet Decarbonisation Action Plan (henceforth Action Plan), consistent with the CCP, is intended to help ensure public bodies understand their role and are able to take the actions required to deliver the Scottish Government's climate change ambitions and enable the public sector to continue to build on progress made to date, accelerating the transition to a zero-emission fleet in a way that aligns efficient public spending with emission reductions. The actions can be implemented by all public bodies, including those not subject to the statutory climate change duties, who should decarbonise their fleet and contribute to national and global climate targets and set a positive example to the public and businesses. The fleet transition should also be treated as an essential part of sheltering public fleets from volatile fossil fuel costs in the medium/long-term and maintain the sustainability in the delivery of public sector services.

Development of the Action Plan

This draft Action Plan has been developed to support senior leaders, fleet managers, building and estate management teams, sustainability, procurement and finance specialists across the public sector. It is also intended to provide insights for the private and financial sector organisations with an interest in fleet services, operation and decarbonisation.

The Action Plan has been developed in collaboration with public bodies and aligns with the ambition and approach to meeting emission reduction targets as set out in the CCP.

Over the past two years Transport Scotland has worked with the Energy Saving Trust (EST) to engage with public sector fleet managers and other stakeholders with an interest in how the public sector fleet operates through their public sector Fleet Manager Forum.

Engagement has also included working with the Blue Light Emergency Services EV group, including members drawn from Police Scotland, Scottish Fire and Rescue, Scottish Ambulance Service and National Health Service, and the Fleet, Transport and Vehicle Maintenance Network Group from Association for Public Service Excellence, including representatives from across Scotland's local authorities, to identify the top ten challenges associated with decarbonising the public sector fleet.

Fleet managers and sustainability leads were then invited to participate in focused workshops to review the identified barriers/challenges and discuss potential actions to address or mitigate those barriers/challenges in more detail, including sharing lessons and experience associated with approaches and actions that have already been tested or implemented in parts of Scotland's public sector. Information gathered through forums and workshops has been instrumental in identifying the top challenges facing public sector fleet decarbonisation.

Challenges, barriers and associated actions to mitigate or manage their impact have been further explored and are included in this Action Plan as either short-term or strategic actions. Short-term actions should be implemented from now and completed by 2030 while strategic actions address issues that will continue to influence the public fleet to 2040 and beyond and should be planned for and implemented from now through to 2040 and beyond.

Policy context

Transport Scotland's purpose is to deliver the Scottish Government's vision for transport, as set out in the 2020 National Transport Strategy 2. Public sector fleet decarbonisation sits within a broader landscape of Scottish Government policies, and this draft Action Plan identifies actions for Scottish Government and the public sector as a whole, but also for the private sector in supporting and enabling fleet decarbonisation.

This draft Action Plan reflects and contributes to the delivery of a number of existing core Scottish Government policies, including:

- Strategic Transport Projects Review (STPR 2), 2022
- Verity House Agreement, 2023
- National Planning Framework (NPF4), 2023

Heavy Goods Vehicles Decarbonisation Pathway for Scotland, 2024
Public Sector Reform Strategy, 2025
Achieving Car Use Reduction in Scotland, renewed policy statement, 2025
Climate Change Plan 2026-2040, 2026

The CCP sets out the actions the Scottish Government will take to achieve Scotland's carbon budget targets.. Carbon budgets cover five-year periods and allow for a reliable and consistent framework for assessing sustained progress in the actions and policies that contribute to achieving Net Zero-emissions by 2045. This Action Plan aligns with the CCP and identifies steps that public bodies should take to remove fleet emissions as part of a transition to a zero-emission public sector fleet between now and 2040.

This Action Plan directly supports policies targeted at the public sector; it proposes a more flexible approach to establishing targets for fleet decarbonisation and provides more localised decision-making around planning, budgeting for, and delivering fleet decarbonisation to meet those emission reduction targets, consistent with the Verity House Agreement and the European Charter of Local Self-Government (Incorporation) (Scotland) Act 2026.

The Action Plan also complements the Public Sector Reform Strategy, addressing challenges and identifying systemic barriers which prevent the public sector from moving faster and further. It includes actions to overcome these barriers and recognises the importance of collaboration and joint working, economies of scale and collaborative procurement for fleet decarbonisation to reduce the costs of decarbonisation.

The Action Plan delivery will also be influenced by overarching policies such as the Vehicle Emissions Trading Schemes (VETS) and the future HGV CO2 emissions regulatory framework for the UK.

The transition of the public sector fleet also plays an important role in supporting Low Emission Zones, which are in operation across Scotland's four largest cities. Public sector fleets are often among the most visible and heavily used vehicles within urban areas and therefore have a key role to play in demonstrating leadership in compliance with LEZ emission standards and in improving local air quality outcomes.

Legislative context

As highlighted in the Introduction, this Action Plan sits within the framework of climate change legislation and aligns with the statutory guidance issued by the

Scottish Ministers under section 45 of the Climate Change (Scotland) Act 2009 ('the 2009 Act').

As amended, the 2009 Act is the central legislation of the climate change framework and supports the just transition to a sustainable, resilient, low-carbon economy.

The 2009 Act places statutory climate change duties onto relevant public bodies. Section 44(2) defines a "public body" as a Scottish public authority within the meaning of section 3(1)(a) of the Freedom of Information (Scotland) Act 2002 (asp 13). Public bodies must check whether they fall within the definition and act accordingly.

The duties are set out in section 44(1) of the 2009 Act and require that a public body must, in exercising its functions, act –

a) in the way best calculated to contribute to the delivery of emissions reduction targets (i.e. mitigation)
b) in the way best calculated to help deliver the Scottish National Adaptation Plan
c) in a way that it considers most sustainable.

Section 45 of the 2009 Act requires Scottish Ministers to give guidance to public bodies in relation to the duties. When deciding how best to fulfil their duties, public bodies are required to take the statutory guidance into account – under the Act they must have regard to such guidance.

In March 2026, the Scottish Government published new Climate change duties: statutory guidance for public bodies. The Statutory Guidance is intended to be useful to all public bodies, not just those legally subject to the climate change duties. The guidance aims to be a potential source of information, tools and support for any public body aiming to contribute to Scotland's national climate change targets and plans.

The Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Order 2015, as amended, requires over 180 public bodies deemed to be 'major players' to report annually on their compliance with the climate change duties. These bodies are listed in schedule 1 of the Order.

In January 2024, Scotland introduced the Vehicle Emissions Trading Schemes Order 2023, alongside England and Wales, extended to Northern Ireland from 2025. The legislation aims to deliver 420 MTCO2e of carbon savings between 2024-2050 across the UK. This is expected to ensure that the supply of zero-emission cars and vans are coming to the UK.

In November 2024, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 came into force, introducing a framework for a 5 year carbon budget-based approach for setting emissions reduction targets up to 2045. The approach to setting public sector fleet emission reduction targets proposed in this draft Action Plan aligns with Scotland's newly adopted carbon budgeting framework. Working towards a progressive reduction in total emissions related to fleet, rather than focusing on various vehicle types, also offers greater flexibility and local autonomy in determining how these reductions are achieved and what is required to deliver them.

In addition to climate change duties, public bodies operating vehicle fleets must also have regard to local air quality policies and regulatory frameworks, including the operation of Low Emission Zones established under the Transport (Scotland) Act 2019. These require that vehicles entering designated areas meet defined emissions standards, reinforcing the need for fleet transition to cleaner vehicles in advance of full decarbonisation.

Public sector fleet targets

Current fleet targets

The 2019 PfG established targets for decarbonisation of the public sector fleet. These targets were based on decarbonising the fleet in stages, based on vehicle type:

- Phase out petrol and diesel cars from our public sector fleet by 2025 and the need for any new petrol and diesel light commercial vehicles.
- Phase out new petrol and diesel vehicles across Scotland's public sector fleet by 2030.

Whilst there has been positive progress towards public fleet decarbonisation targets, with some public bodies currently on track or already having reached 100% zero-emission fleet, these organisations are in the minority. A range of internal and external factors have influenced progress across the public sector as a whole and progress is varied. The 2025 survey confirmed that the 2019 public fleet target for 2025 has not been met.

This Action Plan focuses on a trajectory towards zero-emission vehicles by 2040, however it is important to recognise the need for interim compliance with LEZ emission standards. Public bodies should prioritise, where zero-emission vehicles are not yet viable, the transition to vehicles that meet or exceed current LEZ requirements to deliver immediate air quality benefits in urban areas.

Revised and proposed public sector fleet target

Development of a public sector fleet decarbonisation Action Plan presents an opportunity to review and update the approach to setting public sector fleet decarbonisation targets. It also enables public bodies to consider how to maximise their ongoing contribution to reducing greenhouse gas emissions over the next 15 years, taking consistent action to remove greenhouse gas emissions from public sector fleet operations and supporting the commitments set out in the CCP.

Given the scale and pace of emission reductions required to meet wider Net Zero targets, and the challenging fiscal environment the public sector is currently working within, it is important to ensure that the transition to a decarbonised fleet is planned and delivered in a way that aligns with efficient public spending, available technology and operational requirements whilst maximising emissions reductions. This will require an approach that provides an appropriate level of flexibility on how emission reductions are delivered, encouraging local decision making and the development of strategies that identify opportunities to decarbonise the most polluting vehicles as early as possible, where there is a zero-emission equivalent available at an appropriate cost.

A new approach to emissions reduction targets set out in stages was shared and discussed at public sector fleet engagement workshops. Participants gave positive feedback, noting that inclusion of emission reduction targets offered greater flexibility, particularly in the early stages. Under the PfG targets for example there was no flexibility regarding removing all petrol and diesel cars by the end of 2025. Participants also confirmed that the decarbonisation of heavier fleet should be reflected in the later stages of decarbonisation of the fleet.

The proposed target, based on an emission reduction trajectory towards zero-emissions by 2040 of the overall fleet, have been developed in line with the CCP and feedback from public sector fleet managers.

Working towards a progressive reduction in total emissions related to the overall fleet, rather than focusing on varied vehicle types, also offers greater flexibility and local autonomy in determining how this reduction is achieved and what is required to deliver it. Recognising that it is public bodies collective effort that will deliver on meeting the target, those bodies that can decarbonise earlier and faster, particularly fleets with light vehicles, should do so now.

Data from public sector fleet surveys has been used to apply a set of broad assumptions on what would be required by each public body to deliver the progressive emission reduction outlined below, however individual circumstances, including factors such as rurality and specific vehicle uses, will influence exactly how each public body plans and manages the transition of their fleet.

This emission-based approach to target setting will rely on access to accurate and up-to-date data on fleet composition and use to support planning, decision making and monitoring of fleet decarbonisation. Recognising this, the underpinning target for public sector fleet decarbonisation is that all public bodies have a fleet decarbonisation strategy in place by the end of 2026-27 that includes a consistent and proportionate approach to data collection and reporting.

A revised public sector fleet decarbonisation target is proposed below, this % emission reduction applies a 2025 baseline from the 2025 public sector fleet survey and is assumed to be applied across all public bodies. More detail can be found in Annex 3.

Public Sector Fleet Decarbonisation Target : 62% reduction in overall public sector fleet emissions by 2035 vs 2025

Public sector fleet includes road registered fleet vehicles that are owned or leased. Further information on the categorisation of vehicles (heavy vehicles, specialist vehicles, vehicles over 3.5T etc.) and the current composition of the public sector fleet is included in Annex 2.

It will be the responsibility of each public body to consider how it can meet this emission reduction target and include planned actions in a fleet decarbonisation strategy that contributes to decarbonising the public fleet by 2040. Public bodies are strongly encouraged to set stretching targets that are ambitious (but achievable) and go further than national policy.

The end date target to operate the fleet with zero-emissions vehicles by 2040 is assumed to allow some flexibility around emissions resulting from public services being required where zero-emission technology is not available. This can mitigate short-term issues with operation of energy or transport infrastructure or ensure the public sector fleet's capacity to provide emergency responses is not compromised.

Delivering the Action Plan

This Action Plan sets out a series of actions that should be taken by the public sector to accelerate decarbonisation of the public fleet and achieve a zero-emission road fleet by 2040. The actions have been split into two categories:

Strategic actions overview

Strategic actions are intended to address barriers identified as expected to influence or impact the decarbonisation of public fleets between now and 2040, and potentially beyond.

Work on strategic actions should begin now, whilst delivery of some strategic actions may have pre-requisites or require preparatory work for some bodies, such as ensuring appropriate access to fleet data, planning for delivery of strategic actions should be incorporated into fleet decarbonisation strategies from the outset.

Delivery of some strategic actions will be supported through implementation of short-term actions proposed in this Action Plan.

Short-term actions overview

Short-term actions proposed are more specific and focused, are intended to have a more immediate impact and to be completed in a relatively short time frame.

Short-term actions that should be taken from now and fully implemented by 2030 or sooner depending on circumstances for individual public bodies.

How quickly individual public bodies are able to implement these actions will depend on the size and complexity of fleets and type of services they deliver and the geography of the operational area.

As technology, policy and service requirements develop over the period of the Action Plan, additional short-term actions may be developed, particularly related to vehicle types where there are not currently viable zero emission options readily available.

Strategic actions

As part of developing this draft Action Plan, five barriers to fleet decarbonisation have been identified that are expected to continue to impact or influence public sector fleet decarbonisation between now and 2040.

Through a collaborative approach to developing the draft Action Plan a suite of strategic actions have been identified that the public sector can take to address or manage these barriers.

For each of these barriers, this section of the Action Plan describes the identified barrier, outlines the aims of actions identified to address or mitigate that barrier then lists strategic actions and who may typically be considered appropriate to take responsibility for implementing those actions within a public body.

Securing senior leadership buy-in to zero-emission vehicles

Barrier description

There are many positive examples of the impact of public sector leaders taking action that has helped to put some public bodies at the forefront of fleet decarbonisation. However, there are inconsistencies across many parts of the public sector in the approach taken by senior managers and leaders and demonstrating a commitment to drive the level of change required to accelerate fleet decarbonisation across the public sector.

Aims

These strategic actions aim to ensure that strategic planning is consistently applied and enables large scale transition to zero-emission fleets. Leaders should own and embed strategies and governance that promote collaboration and foster innovation, enabling approaches that can deliver financial and operational efficiencies and prioritise the use of zero-emission vehicles. Public sector leaders should be accessible and openly accountable for the organisation’s progress towards delivering climate targets, advocating partnership for collaborative working both across the organisation and more widely across the public, third and private sectors.

Strategic actions for leaders and senior managers

End of 2026-27

By the end of 2026-27, ensure there is a comprehensive fleet decarbonisation strategy in place that identifies how to transition to a zero-emission fleet by 2040 (including provision of appropriate energy infrastructure), integrates strategic planning across the organisation, prioritises zero-emission travel modes, identifies clear targets and budget requirements and supports consistent messaging and communication of the organisations aims and approach.

From now, and to support delivery of the strategy, establish and implement clear governance structures and decision-making processes that support sustainability and decarbonisation goals, challenge the purchase or use of non-zero-emission vehicles and use up-to-date and accurate data to support decision-making.

Promote the shared use of vehicles and charging / refuelling infrastructure within the organisation and with other public, private and third sector organisations to maximise asset utilisation, environmental benefit and emission reductions. A policy on shared vehicle and infrastructure use should be incorporated into the fleet decarbonisation strategy.

Public sector leaders should also ensure that their organisations' fleets operating within LEZ areas are fully compliant with emission standards at the earliest opportunity, and where possible go beyond minimum requirements. This will demonstrate leadership, improve public confidence, and contribute to local air quality improvement.

> **Wiltshire Council needed a charging strategy to grow its zero-emission fleet. EST carried out a fleet review, using data to create strategic and achievable plans.**
>
> **The council is now on a clear path to a zero-emission fleet, with 51% of their baseline fleet being electric. That's 106 vehicles so far. Operating costs have been significantly reduced, with over £114,000 saved in this financial year alone.**

2026-2028

To support a transition to zero-emission vehicles at scale, between now and 2028 ensure systems are in place to monitor and analyse organisational energy requirements and contribute to coordinated planning of management and

investment in energy systems for the public sector estate and fleets, support cross-sector collaboration and enable early engagement with DNOs.

Ongoing

Continually explore and promote opportunities for joint or collaborative procurement across the organisation and with other public sector bodies, identifying opportunities to reduce costs through economies of scale and applying shared resources, and ensure efficient use of public funding by levering private capital.

Addressing high up-front cost of ZEV and infrastructure

Barrier description

Procuring and operating zero-emission vehicles can involve higher upfront costs compared to fossil fuel alternatives and may require additional investment in charging or refuelling infrastructure by the public sector. While operational costs may be lower due to reduced fuel and maintenance costs, the additional purchase or leasing cost of zero-emission vehicles and development of bespoke solutions where current technologies limit options readily available on the market remain significant barriers to the adoption of zero-emission vehicles at scale, particularly for more specialised public sector vehicles, including emergency and HIAB vehicles.

Aims

These strategic actions aim to establish and embed a consistent and clear approach to identifying vehicle requirements, comparing operational and cost implications of different options and maximising emissions and operational benefits from budget and other resources available, including to support identification of opportunities for collaboration. It is important to use robust and accurate vehicle use and performance data to identify optimal procurement, financing and operational solutions, as well as recognising emission reduction and other benefits, that support business cases for implementing fleet decarbonisation. The predictability of Public Sector Fleet operation represents an attractive energy usage model, potentially allowing bodies to attract external infrastructure investment in return for a ‘Charging As A Service’ model which can be confidently budgeted.

Strategic actions from 2026 until fleet is fully decarbonised:

For fleet managers:

- Ensure efficient use of vehicles and infrastructure by aligning performance requirements with available technology, using data to understand whole life cost of vehicles and support monitoring of developments in available products, services and technology (including energy supply) that identify opportunities for more efficient or effective procurement and operation of fleets. Prioritise replacement of non-compliant vehicles operating within LEZ areas, focusing first on high-mileage and high-exposure routes, to maximise reductions in NO_2 and particulate emissions

Fleet managers & sustainability leads:

- Identify options for clear and consistent communication supporting fleet decarbonisation decisions / proposals that align budget and business cases to the approved fleet decarbonisation strategy and identifies financial, operational, climate and health benefits to justify urgent action that aligns with climate commitments.
- Identify opportunities to collaborate within the organisation, across the public sector or with the private and third sectors, including by encouraging shared mobility options like vehicle pools and car clubs, to reduce costs, support fleet rationalisation and improve vehicle and infrastructure asset utilisation.

Fleet managers, sustainability leads & procurement specialists:

- Work with procurement and finance professionals to develop new approaches to procurement, ownership and operation of fleets, identifying and challenging operational, regulatory or fiscal barriers.
- Identify and implement interim low-emission or alternative fuel solutions for vehicles or operations that are currently harder to electrify using cost effective vehicles that are readily available on the market.

Challenging existing operational practices limiting opportunities for fleet decarbonisation

Description

Public sector fleets are required to deliver a range of public services and meet business needs. Policy and established operating practices have largely been developed based on petrol and diesel vehicles and at times those established approaches may limit or restrict the use of ZEVs. Actions that involve embedding new approaches to procurement, financing and operating fleets may also require a more flexible approach to fleet management and use and levels of collaboration or partnership working that cannot be incorporated into standard working practices.

In addition to the use of vehicles, electrifying fleet depots presents a range of logistical, financial, and technical challenges. Many depots currently lack the necessary electrical infrastructure to support large-scale vehicle charging, requiring costly upgrades to grid connections and on-site power capacity. Higher costs may be offset by sharing access to infrastructure, maximising charge point utilisation, but constraints including space, insurance, health and safety and security can limit options.

Aims

These strategic actions aim to review established policies and operating practices and identify opportunities to rationalise public fleets, increase the proportion of zero-emission vehicles and mileage associated with delivering public services, reduce the cost of procuring and operating public fleets and enable collaboration. To enable consolidation of underutilised vehicles, encourage cross-departmental or cross-organisational sharing and identify cost effective charging and refuelling solutions.

Consider centralising control of fleet management, making it easier to implement changes in the fleet composition and use, ensuring appropriate resources are allocated to fleet management and decarbonisation.

Strategic actions from 2026 until fleet fully decarbonised for:

Fleet managers:

- Enable fleet sharing across the organisation or through introducing fleet sharing platforms and car clubs to reduce pool vehicle costs, allocating vehicles based on more specific journey or operational requirements, and reviewing how vehicles are used and where they are kept and charged overnight.
- Use data on vehicle and energy use and availability to identify the most appropriate type of charging or refuelling infrastructure for depots, consider options to manage use and access to infrastructure and where appropriate how public fleet charging or refuelling requirements can be met at third party sites.
- Explore options to share access to charging infrastructure, partner with third parties and consider accessing charging or refuelling at other locations, particularly for high capacity charging requirements.

> **First Bus, one of the largest bus operators in the UK, serves Greater Glasgow and Aberdeen. The company is committed to achieving net zero emissions by 2035 and has made significant investments in electric vehicle infrastructure. They have implemented a shared use model on their charging sites to generate revenue from the infrastructure. Under this model, the bus fleet charges overnight, and during the day the chargers are available for the public sector, local businesses and the community to use. This model has been proven to work and an additional 17 bus depots across a range of bus operators will be open to other fleets in Scotland by the end of 2026.**

Fleet managers & sustainability leads:

- Consider energy needs beyond transport and identify opportunities to integrate distributed energy resources, such as solar, battery storage or microgrids. Utilise smart charging, load management and grid optimisation

to enhance energy efficiency and maximise the use of available grid connections.

- Where possible identify opportunities for the private sector to invest in infrastructure for ZEVs, minimising public investment and maximising utilisation of installed infrastructure, regardless of who owns or operates the infrastructure.
- Consider opportunities to create revenue streams by partnering with the private sector and providing access to EV charging, where appropriate and possible, to other fleets or EV drivers.
- To challenge existing organisational and operational approaches and structures that favour internal combustion vehicles and explore where alternative approaches to procuring, managing and delivering services or business travel can help minimise fleet emissions and deliver operating efficiencies.

Fleet managers, sustainability leads & procurement specialists:

- Identify opportunities for joint procurement of vehicles, infrastructure or services, creating economies of scale and using resources more efficiently through contract and service management and delivery.

Overcoming the lack of maintenance skills and capacity within public bodies and the supply chain.

Description

In comparison to fossil fuel vehicles, EVs are reported as regularly encountering extensive delays associated with vehicle maintenance and repair, resulting in vehicles being off the road for longer than its ICE equivalent, particularly for repairs covered under manufacturer warranties.

In addition, the availability of qualified mechanics, variable manufacturer aftersales support and access to spare parts further impacts on efficient and timely servicing and repair of ZEVs. Specific to the public sector, comparatively lower public sector salaries create issues related to recruitment and retention of EV qualified mechanics. Issues related to skills and supply chains are often more acute in rural and island locations.

Aims

Work across the public, private and third sectors to support skills development and growth of supply chains across Scotland. Develop capacity within the public sector and prioritise local supply chains that create and sustain high quality green jobs.

Strategic actions from 2026 until fleet is fully decarbonised:

Fleet managers & sustainability leads:

- Ensure fleet and estate management strategies are aligned and recognise opportunities to upskill internal maintenance staff and upgrade workshops, identifying opportunities for collaboration and to share resources. This should include policies that target retention of skilled public sector staff and create viable opportunities for local businesses as part of the supply chain.
- Create opportunities to improve service levels for other public, private and third sector organisations through collaboration and pooling of resources to deliver repair and maintenance services for ZEVs and infrastructure owned or operated by other organisations or individuals.
- Identify skills gaps across all aspects of fleet procurement, maintenance, operation and use and explore where training, peer to peer learning or direct experience of using ZEVs would encourage a higher proportion of ZEV use. Develop approaches to engaging those involved in the procurement, management and use of public fleet that encourages behaviour change and maximises emission reduction.
- Identify and highlight cases where demand for training exceeds training capacity or where there is a lack of training courses, opportunities to aggregate demand and highlighting operational impacts to government and training providers. The public sector should engage with government to explore barriers to any identified shortage of qualified ZEV or infrastructure technicians, including within SMEs.

Overcoming grid restraints and capacity and lead in times for upgrades

Description

The availability of up-to-date and accurate vehicle, grid capacity and future energy demand data can impact on the quality of investment plans for decarbonisation of fleets and investment at depots. Distribution Network Operators (DNOs) delays for new connections and lead in times for more significant grid upgrades are a significant barrier to installing the infrastructure required to enable electrification of public sector fleet at pace. The impact of these issues can be more acute in rural or island locations and will potentially be further compounded by rising demand for grid connections across sectors, placing additional pressure on DNOs and creating bottlenecks in infrastructure deployment.

Aims

These strategic actions aim to ensure that comprehensive, up-to-date data is available to support planning for energy requirements, new electrical connections and grid upgrades, enabling early engagement with DNOs and other organisations planning future investment that require grid connections, particularly where this supports local or regional planning and may offer interim or permanent solutions to locally grid constrained sites.

Strategic actions from 2026- 2028:

Fleet managers & sustainability leads:

- Identify energy needs in fleet and estate decarbonisation strategies and align data gathering and management to support energy demand forecasting, including how much energy is required when, and consider how energy demands can be met through grid capacity or other on-site generation or storage solutions.
- Engage as early as possible on future energy requirements and site decarbonisation plans with DNOs, involving regional energy planning initiatives and local area energy system planners to understand options, logistics and cost implications of proposed grid upgrades.
- Ensure fleet and estate managers work together, use grid and electrical supply planning tools and identify and engage with local public, private or third sector organisations also considering future energy needs and fleet

decarbonisation, ensuring future grid connections or upgrades are planned as effectively as possible.

- Explore opportunities for collaboration with the private sector to manage short-, medium- and long-term energy demands, including use of public or shared EV charging networks, exploring short to medium term Power Purchase Agreements and partnership or joint investment options.

Short-term actions

Although not all actions are directly relevant to every public body, some public bodies have already made significant progress in these areas. Where possible this experience has been used to develop guidance and case studies that outline the approach and principles that could be effectively applied across the whole public sector.

Rationalise fleets and only procure zero-emission cars and vans

Short-term actions for senior managers:

By the end of 2026-27 ensure decision-making and management of public sector fleet vehicles is co-ordinated appropriately, empowering fleet managers to have more control over how the organisations fleet is procured and used.

Short-term actions for fleet managers:

By the end of 2027

- Develop and embed a vehicle replacement policy that defaults to ZEVs.
- Use data to conduct fleet analysis to review and identify underused vehicles, review operational mileage across the fleet with the aim of converting as many vehicles to electric as possible prioritising replacing high mileage vehicles with EVs.
- Conduct cost benefit analysis of vehicle use and charging options, including vehicles taken home by staff overnight.

Ongoing:

- Consider leasing and purchasing nearly new, used EVs.
- Where feasible, downsize cars and vans to an appropriate electric alternative.

- Select vehicles with smaller battery packs where feasible as these will offer a more efficient and sustainable option.

Short-term actions for fleet managers & sustainability leads:

- Identify opportunities to work collaboratively across the organisation and wider public, private and third sectors

Over a third of Falkirk Council's fleet are electric vehicles. This includes an almost all-electric pool car fleet. The council took early action and focused on transitioning their cars to zero emission using an 'EV first' procurement model. Under this model, they only procured diesel or petrol cars if a zero-emission model was not currently suitable. Their initial focus was on easy-to-transition vehicles, such as cars and small vans, however they are now also tackling higher-emitting vehicles such as large vans.

Enable the sharing of vehicles and infrastructure

Short-term actions for senior managers

- Implement centralised fleet management within the organisation to better enable cross-departmental access and oversight. Reduce fleet costs and maximise vehicle utilisation by requiring the use of shared pool vehicles across departments and where possible externally. This can include car clubs and shared fleet schemes.

Short-term actions for fleet managers

- Identify and implement fleet sharing solutions with other public, private and third sector organisations.

Short-term actions for fleet, estate and sustainability managers

- Reduce the cost of operating zero-emission fleets by exploring opportunities to lever private sector capital through collaboration across the organisation and with the wider public, private and third sectors.
- Enable shared use of depot charging infrastructure by redesigning site layouts to support multi-user access and implementing a back office system with both booking and individual pricing functionality.
- Engage with insurance providers early to understand liability and operational risks associated with shared use of vehicles and infrastructure, taking action to mitigate risks where required and possible.

Short-term actions for fleet & finance managers

- Develop sustainable financing models for shared fleet and infrastructure initiatives that can operate sustainably and without relying on ongoing central government or other grant support.

> **Sharing infrastructure - Our emergency services have established a Bluelight EV group and have procured a charge point back-office system that enables them to share depot charging infrastructure.**

Sharing fleet - East Lothian Council have located three fleet vehicles in locations that can be easily accessed by employees when needed. They have partnered with a company called Hiyacar who provide a vehicle management solution. This solution allows the vehicles to be available as car club vehicles for the public when they are not being used by council employees.

Plan for charging electric fleets and heavier fleet replacement programmes to phase out fossil fuel vehicles.

Short-term actions for fleet managers

- Early strategic planning is a priority action with the development of a fleet decarbonisation strategy by 2026-27 that includes plans on where an electric fleet will charge and the phasing in of heavier vehicles and

forecast energy needs transition to zero-emission heavy-duty vehicles (HDVs) by 2040.

- Identify where existing technology is available to operate zero emission heavy fleet, including refuse collection vehicles, trucks and buses, which should be prioritised for decarbonisation in the strategy.
- Collaborate with other public sector bodies and the private sector to explore joint procurement opportunities, shared infrastructure, and the development of smart charging hubs to reduce costs and improve efficiency.

Short-term actions for fleet, estates & sustainability managers

- Plan upgrades of depot charging infrastructure provision to support charging for vehicles, including heavier fleet vehicles, and explore where partnerships with other public or private sector organisations or use of third-party sites is a more effective charging solution.
- Engage early with Distribution Network Operators (DNOs) to avoid delays and plan for future grid capacity requirements. Consider battery storage, solar, and microgrid solutions to support depot energy needs. It may be helpful to engage with specialist charging partners who have experience in providing these services in support of mixed fleets and can navigate sophisticated energy use strategies and commercial investment to spread the cost of installation over time.

Short-term actions for fleet managers and finance managers

- Consider innovative procurement (e.g. OPEX models such as Charging as a Service (CaaS) for depot charging infrastructure), financing and leasing models to reduce upfront capital investment (e.g. per-bin-lift leasing for electric refuse vehicles). Local authorities may be able to access Public Works Loan Board (PWLB) or UK National Wealth Fund for capital borrowing.
- Use data to assess total cost of ownership (TCO) and carbon impact of heavier fleet vehicles.

Use data from telematics and other sources to inform decision-making and reduce emissions.

Short-term actions for fleet managers

- Use data to identify opportunities to rationalise fleets and identify optimal ZEV replacements.
- Consider establishing a monitoring process to assess compliance with organisational fleet and sustainability policies and implementing corrective actions where non-compliance is identified.

Short-term actions for fleet and service delivery managers

- Use telematics to optimise route planning, monitor usage, increase efficiency and safety by monitoring driver behaviours and identify any training or coaching needs. Consider deploying telematics with AI integration technology to enhance data analysis and fleet management.
- Support drivers with training and guidance to improve driving efficiency, optimise route planning to incorporate charging stops where necessary, minimising downtime and emissions.
- Use data to maximise emission savings, organisations should implement policy to reduce annual mileage completed in fossil fuel vehicles and increase the mileage in ZEVs and monitor fuel usage.

Actions for Scottish Government

- Responsibility for taking action to decarbonise the public sector fleet rests with the public bodies that own and operate fleets across Scotland. The Scottish Government will adopt a convening and enabling role, helping to create an environment that encourages collaboration and recognises where government influence is required to address legislative, financial, or other structural barriers to decarbonising the public sector fleet.
- Incorporate future reporting on fleet decarbonisation and public sector fleet emissions as part of statutory reporting requirements for public bodies.
- Engage with the public sector, public body sponsorship leads, and liaison officers on this draft action plan; then finalise and publish the definitive version in 2026, as committed in CCP.
- Share with sponsorship leads to confirm the forecast additional costs of transitioning the remainder of the public sector fleet to zero-emission vehicles

so that they can then cascade the information around approximate lifetime saving relative to the combined additional Total Cost of Ownership and EV Cost of Infrastructure to their respective sponsored bodies.

Next steps

This draft Public Sector Fleet Decarbonisation Action Plan has been developed through engagement and collaboration with the public sector. Following the publication of this draft Action Plan, Transport Scotland will continue to engage with key stakeholders across the public sector and more widely.

This final round of engagement and consultation is intended to:

- Confirm that the identified barriers reflect the environment the public sector is currently working under, and actions are appropriate and proportionate.
- Identify assumptions or pre-requisites required to deliver the actions set out in the Action Plan, including advances and further development of energy networks and systems and zero-emission vehicle and infrastructure technology.
- Confirm that the actions proposed within the draft Action Plan are considered sufficient to deliver the ambition for public sector fleet decarbonisation set out in the Action Plan.
- Confirm that public bodies are willing to endorse the ambition and actions set out within the plan and work collectively and collaboratively to continue decarbonising Scotland's public sector fleet.

During Summer 2026 Transport Scotland officials will continue to engage with key stakeholders who have already contributed to drafting of the Action Plan and including, Scottish Government public body sponsorship teams, COSLA, the Society of Local Authority Chief Executives and Senior Managers (SOLACE), Association for Public Service Excellence (APSE), Blue light Emergency Services EV group and private sector charge point operators with an interest in fleet charging. This final stage of engagement and consultation will be used to finalise the Public Sector Fleet Decarbonisation Action Plan, which will be published in late 2026.

Measuring success & monitoring progress

Ongoing monitoring of the composition and use of the public fleet will be essential to track progress with fleet decarbonisation and emission reductions, identify

where actions are not having the expected impact and identify where progress has or could be impacted by additional new or emerging barriers.

In the mid-term Transport Scotland may continue to undertake a high-level survey of the public fleet to continue to track progress public fleet decarbonisation in 2027 or 2028, subject to available funding. However, this is not an effective approach to monitoring progress with decarbonising the public fleet and emission reductions in the medium to long term. It is essential that fleet decarbonisation strategies identify how data on fleet composition, use and replacement plans is captured, shared and reported, wherever possible applying a consistent approach across public sector bodies.

In addition to statutory reporting, public bodies should make information on fleet composition and use available in the public domain, including the proportion of zero-emission, low carbon and traditional combustion engine vehicles and miles. This will help ensure a more transparent approach to reporting progress, which in turn will ensure that public bodies are accountable for performance against both emission reduction targets and their own fleet decarbonisation strategies.

The targets proposed in this Action Plan are based on a percentage reduction in fleet emissions in 2035. This trajectory is based on assumptions around the proportion of different vehicle types that could be decarbonised to deliver those target emission reductions, however in practice financial, operational or other factors will mean the route to achieving emission reductions will vary across different public bodies.

To help ensure there is an appropriate level of clarity around progress towards meeting these targets, a fleet decarbonisation strategy should identify how each public body aims to decarbonise its respective fleet. Regular and accurate reporting of the number of zero-emission, ultra-low emission and internal combustion vehicles, as well as mileage and/or fuel use will help calculate greenhouse gas emission levels, reporting is important to enable slippage or new or evolving barriers to be identified as early as possible.

Future reporting of progress towards fleet decarbonisation and fleet emission reductions is expected to be incorporated from 2028/29 as part of statutory annual public body greenhouse gas emissions reporting.

In addition to greenhouse gas emissions, public bodies should consider how fleet data can be used to monitor and report on air quality-related outcomes, including reductions in NO_2 and particulate emissions, particularly in urban and LEZ areas. This will support alignment with national air quality strategies and provide a more complete picture of environmental benefits.

Forecasting/mapping technology and cost

ZEV and infrastructure technology and associated services continue to develop, providing more choice and options for ZEVs and making it practical to use a zero-emission vehicle for a wider range of applications or services.

There is a requirement for further development in ZEV technology, particularly in relation to heavy and specialist vehicles, Transport Scotland has already supported the introduction of zero-emission heavy vehicles and development of prototype emergency ZEVs, like Scotland's first zero-emission fire engine, which was manufactured by the Cumnock-based specialist fire-fighting technology provider Emergency One. A number of public bodies have also begun to introduce zero-emission heavy fleet using their own capital or operating budgets, it will be important to understand how existing technology performs and to identify where there are operational requirements, or cost barriers, that require further technological developments.

Collating data on the operational requirements of public sector fleets will be essential to fully understand where there are gaps in existing technology that need to be addressed, either through developments in battery electric technology or through other zero-emission technology solutions. This information can help to engage with vehicle and infrastructure manufacturers, installers and associated service sectors.

Fleet decarbonisation strategies should identify specific vehicle types or uses that cannot currently be decarbonised utilising available technology, as well as reviewing when appropriate technology is expected to be available. Information on current technology gaps was collated as part of the 2025 public sector fleet survey and will be used to support forecasting of solutions becoming available on the market. This informed any revisions on assumptions related to how fleet decarbonisation targets proposed in the draft Action Plan could be delivered.

Going further

The need for collaboration

Collaboration is essential to maximise efficiency, rationalise vehicle use, reduce costs, and accelerate the transition to a zero-emission fleet. By working together,

public bodies can maximise emissions reductions, share costs, pool resources, generate demand to achieve economies of scale, and attract private investment.

It will not be possible to achieve the scale and pace of emission reductions needed without a genuine openness and willingness to collaborate, work in partnership and share access to infrastructure and resources. Collaboration will bring efficiencies, opportunities for fleet or operational rationalisation and, importantly, create more opportunities to unlock or lever in private capital.

Developing an approach to fleet procurement and operation of public sector fleets creates opportunities to lever private investment, and private capital is essential as the public sector will not be able to meet the full cost of transitioning vehicles and installing infrastructure required.

There are already a range of examples of the benefits of collaboration across the public and private sectors, including ScotZeb – where public funding is enabling private investment to decarbonise bus fleets and install high capacity charging that is accessible to public and private sector fleets – and the EV Infrastructure Fund - where public funding is enabling local authorities to collaborate to develop opportunities at a regional scale that can attract the right level of private investment in public EV charging networks. Public grant funding is expected to continue to have a focus on enabling larger scale private investment, for example through development of collaborative or consortia led approaches to investment in vehicles and infrastructure. The public sector should consider where this type of approach creates opportunities to reduce up front or operational costs associated with decarbonising the public sector fleet.

Where there are legislative, accounting or other barriers to the public sector participating in a partnership, consortia or other form of collaboration, these should be explored and where appropriate challenged and highlighted to relevant policy leads within Scottish Government.

Alternatives to battery electric vehicles

It is anticipated that the majority of vehicles in the public sector will be decarbonised through a transition to battery electric vehicles (BEVs). However, there may be some circumstances where this is will not be possible based on technology available at the time. Other types of vehicles or fuel may be used as interim measures, where they can reduce fleet emissions, supporting a progressive reduction in emissions from the public sector fleet but retaining the required level of resilience across public and emergency services.

Plug in hybrid vehicles (PHEVs) may offer a cost-effective interim solution where there are no equivalent solutions available on the market. However recent analysis has indicated that they are not great from an emission reduction perspective. Where possible these should only be considered where it can be demonstrated a hybrid vehicle is able to make a meaningful contribution to emission reductions towards a zero-emission public fleet by 2040, for example by operating wholly on battery power during standard operation. This may be an option employed to ensure resilient public services, using internal combustion as an exception where it is not possible to charge a vehicle or to respond to an emergency.

Green hydrogen offers alternatives to battery EVs. It is produced using renewable electricity via electrolysis and is considered the most sustainable hydrogen fuel for powering zero-emission fuel cell EVs. However, both hydrogen vehicles and green hydrogen remain expensive compared to battery EVs and other fuels. In the short to medium term, there is currently a limited supply and insufficient refuelling infrastructure to support a large-scale transition to fuel cell EVs. Despite these challenges, green hydrogen could offer a viable solution for utilising curtailed wind energy caused by grid constraints. It may also provide a viable fuel alternative for heavier, more specialised vehicles where electricity infrastructure cannot be installed, however progress in developing either vehicles or green hydrogen has not yet progressed as fast as was initially envisaged.

Hydrotreated Vegetable Oil (HVO) is recognised by the Renewable Transport Fuel Obligation (administered by the UK Department for Transport) as a low-carbon alternative to diesel. While HVO can serve as a valuable transitional fuel, the public sector should not treat it as a substitute for comprehensive fleet decarbonisation. If introduced, it should form part of a broader strategy that includes due diligence, lifecycle emissions analysis, and alignment with long-term net-zero objectives. There are also important considerations such as supply chain transparency which is essential to ensure sustainability and emissions integrity.

Procurement of services

The public sector should review and consider how greenhouse gas (GHG) emissions are assessed in tenders/contracts that involve the utilisation of road transport and road-based vehicles whilst in the course of business and explore and enable ways that the public sector can ensure suppliers and supply chains make an appropriate and proportionate contribution to emission reductions from transport.

Consider introducing additional requirements that can quantify and deliver emission reductions within procurement of public services involving transport or vehicle use. This could include but not limited to, the following:

- Setting carbon budgets specific to contract delivery as hard targets within ITT documentation (with appropriate weightings applied to the technical envelope). In addition, consider setting mandatory pass/fail questions within the technical envelope to meet pre-determined criteria complimentary to the goods/services required.
- Implementing internal carbon pricing or establish a suite of meaningful key performance indicators (KPIs) to incentivise contractors and respective supply chains to decarbonise their fleets. It is important that these changes are developed collaboratively and that supply chains are actively engaged to ensure all parties (the Contracting Authority and supply chain) fully understand the potential impacts of any proposed measures.

Transport Scotland Net Zero Route Map sets out a clear and credible pathway to achieving Net Zero by 2045 on the Scottish Trunk Road Network. A suite of targeted interventions has been developed in partnership with Operating Companies and industry carbon specialists to address the main sources of emissions across materials, transport, plant and fleet, depots, and operational activities, supported by enabling policy, procurement, and behavioural change measures. The approach to assessing greenhouse gas emissions within contracts for example will be reviewed, including opportunities to strengthen requirements through carbon budgets, internal carbon pricing, or the use of Key Performance Indicators to encourage desirable outcomes.

Procurement frameworks and contract requirements should also consider air quality impacts, including requirements for suppliers to use LEZ-compliant or zero-emission vehicles where operating in urban areas. This will help ensure consistency between fleet decarbonisation, air quality objectives, and wider transport policy.

Reducing grey fleet emissions

Whilst not directly attributed to the public sector's own fleet, the public sector can reduce grey fleet (use of privately owned or leased vehicles for business travel) emissions by implementing a range of practical strategies that encourage low emission travel and reduce reliance on personal vehicles for work related journeys. Applying Scotland's National Transport Strategy Sustainable Travel Hierarchy and promoting alternatives to driving, such as cycling and using public transport. In addition, where possible using technology to hold online meetings and offering remote working.

Grey fleet usage can be reduced by establishing car clubs providing access to zero-emission alternatives to using private cars for business, including car clubs and other shared vehicles. Offering incentives for greener travel options such as active travel, public transport or considering electric vehicle salary sacrifice schemes that mean where a private vehicle is used for business, it is still zero emission. Educating and engaging staff through awareness campaigns and eco-driving training can further support long-term behavioural change and promote more sustainable travel choices.

Annex 1: Roles for key stakeholders:

In reference to roles detailed in this document, we define the following:

Senior manager – persons who hold strategic and operational roles in the public sector including chief executive officers.

Accountable for the decarbonisation of public sector fleets and the delivery of strategic actions in this action plan.

Under the Climate Change (Scotland) Act 2009 contribute to the delivery of Scotland's national emissions reduction targets.

Responsible for ensuring that a fleet decarbonisation strategy is in place.

Fleet Manager – person responsible for overseeing and coordinating the operation, maintenance, and administration of the organisation/public body's vehicle fleet.

Responsible for delivering short term actions.

Responsible for collaborating with DNOs to ensure that energy needs are met to decarbonise fleets.

Collaborating with others and identifying opportunities to accelerate fleet decarbonisation.

Maximising emissions reduction from fleet.

Collecting fleet data and monitoring fuel usage.

Sustainability Lead – person responsible for driving the organisation/public body's environmental and net zero carbon goals and in the absence of a fleet manager to deliver fleet manager actions.

Estate Manager – person responsible for management of buildings, facilities, and infrastructure.

Responsible for supporting the delivery of short-term actions and collaborating with others to support fleet decarbonisation in the organisation.

Procurement Specialists - public sector procurement officers responsible for managing the sourcing and acquisition of goods, services, that delivers value for money, ensures compliance with procurement regulations, and supports strategic organisational goals.

Roles for other key stakeholders:

The Scottish Government and Transport Scotland

Responsible for Scottish planning policy.

Responsible for devolved transport policy and legislation.

Scottish Budget and budget setting.

Climate Change Plan and Carbon Budgets.

Policy development to enable private investment in public EV charging networks.

Encouraging collaboration and use of innovative financing solutions for fleet decarbonisation.

Monitoring fleet decarbonisation progress.

The UK Government, including the UK Department for Transport (DfT) and the Office for Zero Emission Vehicles (OZEV)

Responsible for policy and planning for the UK energy network.

Leads a four-nation approach to the Vehicle Emission Trading Scheme (VETS), phasing out the sale of petrol and diesel cars and vans, and mandating increased EV sales.

Responsible for taxation policy related to use of vehicles for business.

Local Authorities Stakeholders

COSLA: Comprising all 32 Scottish local authorities, responsible for providing political leadership for all local authorities.

Association of Public Service Excellence (APSE) Scotland: Supports local authorities in transitioning to EV fleets and alternative fuels, focusing on decarbonising public sector transportation and waste management services to meet Scotland's climate goals.

The Scottish Collaboration of Transport Specialists (SCOTS): Comprising Scotland’s 32 local authorities and seven regional transport partnerships, collaborates to enhance transportation policy, professional development, and infrastructure safety.

The Energy Savings Trust

Supports the public sector through Fleet Decarbonisation Forums, delivering experience and shared learning.

Responsible for stakeholder engagement post publication maintaining/hosting online fleet decarbonisation guidance.

Distribution Network Operators

Responsible for strategic planning to ensure that the electricity system provides a stable and reliable energy system at the point of need.

Charge Point Operators (CPOs)

Responsible for working with the public sector and investing in EV charging infrastructure for the public sector fleet or that the public sector fleet can access.

Society of Motor Manufacturers and Traders (SMMT)

Responsible for encouraging motor trade industry across Scotland to reduce delays in repairs and maintenance of zero-emission vehicles.

Scottish Motor Trade Association (SMTA)

Responsible for encouraging, promoting, and protecting the interests of its members in the motor trade industry across Scotland.

Vehicle Manufacturers

To introduce zero-emission vehicles to the market for more specialised and heavier vehicles

Public Sector Procurement Services

Responsible for simplifying procurement, allowing access to suppliers for everyday and complex requirements.

Chargepoint operators/installers, fleet/rental/hire management services

Responsible for promoting innovative affordable solutions to the public sector to support decarbonisation of the public sector fleet.

Annex 2: Vehicle categorisation

Table 2 - Vehicle categorisation for public sector fleet targets, as per Annex 3

Decarbonisation Target Vehicle Groupings	Includes
Overall public sector fleet	All vehicles
Heavy vehicle	HGV, tipper, gritter, RCV, Fire Fighting Vehicle, Tractors
Vehicles over 3.5T	HGV, gritter, tipper, RCV, Ambulance, bus coach, bus minibus, Fire Fighting Vehicle, Tractors

Table 2 shows the vehicle types that are included within each grouping in the public sector targets.

Table 3 - Zero-emission vehicle adoption in the public sector fleet

Vehicle Type (registered road vehicles)	2020 % Zero-emission	2023 % Zero-emission	2025 % Zero-emission
Passenger Cars	11%	36%	50%
VAN – 3.5 Tonnes and under	4%	14%	17%
Total Fleet (All Vehicles)	5%	17%	23%

Note: (no fleet survey was conducted in 2021. 2022 and 2024 survey results not shown)

Table 3 shows that the percentage of cars decarbonised in 2025 has increased from 11% to 50%, light commercial vehicles vans (under 3.5 tonnes) have increased from 4% to 17% and the total fleet of zero emission vehicles has increased from 5% to 23%. Not all public bodies returned fleet data in each of the years, in 2023 this includes five local authorities who did not provide data.

Table 4: Breakdown of Public Sector Fleet Decarbonisation progress by Organisation Type at the end of 2025 The largest proportion of public sector fleet vehicles are operated by local authorities, followed by the blue light emergency services and health bodies. View further details on Scottish national public bodies.

Table 4 - Breakdown of Public Sector Fleet Decarbonisation progress by Organisation Type at the end of 2025

Organisation Type	Fleet Size	ZEVs	ZEV %
Colleges & Universities	548	165	30.1%
Core Scottish Government	185	49	26.5%
Executive Agencies	757	121	16.0%
Executive NDPB	700	198	28.3%
Health Bodies	4,936	1,826	37.0%
Local Authority	18,611	2,546	13.7%
Non Ministerial Offices	25	18	72.0%
Non public body - public-private partnership	12	0	0.0%

Organisation Type	Fleet Size	ZEVs	ZEV %
Non public body under Scottish Rail Holdings	129	6	4.7%
Scottish Road Works Commissioner	1	1	100.0%
Audit Scotland	32	10	31.3%
Scottish Fire and Rescue Service	1,659	244	14.7%
Scottish Police Authority	3,437	1627	47.3%
Public Corporations	2,109	745	35.3%
Regional Transport Partnerships	56	13	23.2%
Grand Total	33,197	7,569	22.8%

Table 5 - Breakdown % of vehicle types at the end of 2025 that are zero emission

Fuel Type	Fleet Size	ZEVs	ZEV %
CAR	10,257	5,151	50.2%
VAN - 3.5t and under	13,426	2,310	16.9%
HGV	1,387	4	0.3%
Gritter	261	0	0.0%
Tipper	1,649	13	0.8%
Street Sweeper	251	10	4.0%
RCV	1,255	19	1.5%
Ambulance	609	8	1.3%
Bus Coach	293	3	1.1%
Bus Minibus	1,445	21	1.5%
Fire Fighting Vehicle	742	1	0.1%
Motorbike	85	0	0.0%
Tractor	625	4	0.6%
Miscellaneous	912	25	2.7%
Grand Total	33,197	7,569	22.8%

Table 5 shows a breakdown of the percentage of vehicles in the public sector fleet that are zero emission, 50% of cars, 17% of vans (under 3.5t), 1.5% of refuse collection vehicles, 4% of street sweepers, 1.5% of minibuses and 2.7% classed as miscellaneous vehicles (a mix of road registered plant and utility vehicles).

Annex 3: Emissions target baseline and proposed fleet target

Methodology

The size and composition of the public sector fleet is taken from EST's public sector fleet decarbonisation survey for 2025. This provides the composition of the fleet by vehicle type and includes numbers of vehicles that are already zero-emission.

Average annual emissions values are applied to the fleet to estimate total annual emissions in 2025. For vehicles such as cars and vans, published emissions factors (emissions per mile) are applied to average annual mileage to estimate total emissions per vehicle. These estimates are compared with results derived from 2020 and 2022 studies of the public sector fleet, which estimate emissions using fuel consumption and mileage data reported by public sector bodies, to ensure that results are in the expected range.

For more specialist vehicle types, such as ambulances and RCVs, average annual vehicle emissions are taken from the 2020 and 2022 studies, however it should be noted that there is considerable variance in these estimates from year to year and there is limited other evidence available on how these vehicles are used.

Uncertainties

Without regular reporting on the mileage or fuel consumption of individual vehicle types across the public sector, there is uncertainty in the estimate of current emissions. This is because we do not have consistent and up to date data on the way in which vehicles are being used across all of the public sector fleet.

In addition, the level of information available for some vehicle types is very limited and the emissions estimates are sensitive to the assumptions used.

However, the approach outlined here provides a transparent draft estimate of 2025 emissions that can be used as a basis to set a target and be refined in future years as more data becomes available. As a sense check, the total level of public sector

fleet emissions estimated using this approach is within 2% of the total reported by SSN in Public Bodies Climate Change Reporting - Analysis Report 2024-25.

Assumptions

Cars

- Central estimate uses average annual distance travelled by cars in the UK (11,909 km).
- Average CO2e emissions for petrol vehicles is applied to the non-ZE fleet.
- Total emissions are estimated by combining average annual CO2e emissions of an average car (2 tonnes/year) to the total non-ZE fleet in 2025.
- This is in the same region as results from the 2020 and 2022 surveys (2.1 to 2.3 tonnes of CO2e per vehicle per year)

Vans

- Average annual mileage is reported in DfT's van survey at around 21,000 km. However, this is higher than the average van mileages reported in the 2020 and 2022 public sector fleet studies. A more conservative estimate of 16,000 km per year is assumed for vans in the public sector fleet.
- Average CO2e emissions for diesel vans <3.5t are applied to the non-ZE fleet.
- Total emissions are estimated by combining average annual emissions of an average van (4 tonnes/year) to the total non-ZE fleet in 2025.
- This is in the same region as results from the 2020 and 2022 surveys (3.6 to 3.9 tonnes of CO2e per van per year)

HGV

- Average HGV mileage and emissions factors for the general HGV fleet are available, however the use of HGVs in the public sector fleet is likely to differ to private sector vehicles used for the movement of goods and freight.
- Estimates of average emissions from public sector HGVs in the 2020 and 2022 studies are between 16.4 to 18 tonnes per vehicle per year.

- The average of these two values (17.2 tCO2e/year) is applied to the non-ZE public sector fleet in 2025.

Minibus

- The vast majority of minibuses are assumed to be derived from panel vans, and so average van emissions are assumed to be representative.
- A 2014 study found that Local-Authority owned minibuses averaged around 18,000 km per year. This is consistent with the 2020 and 2022 studies which suggest average mileage of minibuses tends to be higher than for vans.
- This suggests average annual emissions of around 4.5 tCO2e/vehicle per year.

Coach

- There are 284 coaches in the public sector fleet as at 2025, and very limited data on their use was collected through the 2020 and 2022 studies.
- Average vehicle emissions per km are taken from LowCVP Coach report 2020 web version V2.pdf
- Average annual mileage will vary significantly between vehicle use. An average of 30,000 km per year is assumed however more information on public bodies use of coaches would be required to verify this.
- This suggests an average annual emissions of around 37 tCO2e per year.

All other vehicle types (gritter; tipper; street sweepers; RCVs; ambulances; motorcycles; fire engines; tractors)

For all other vehicle types there is very limited published data on vehicle use and emissions. Therefore, average emissions per vehicle for most vehicle types estimated in the 2020 and 2022 studies are used and applied to the total non-ZE fleet in the public sector.

- For some vehicle types these estimates are based on very limited data, and so there is considerable uncertainty in estimating emissions from this segment of the fleet.

- For Refuse Collection Vehicles (RCVs), average emissions are informed by data held by EST. The overall estimate is sensitive to the value used for RCV emissions.

- For vehicles classified as 'miscellaneous', average car emissions are assumed. The estimates are of course sensitive to this assumption.

Results

Using the methodology above, emissions from the public sector vehicle fleet in 2025 are estimated at around 220,000 tonnes of CO2e.

This estimate is uncertain and is based on previously gathered data from the public sector, some of which is very limited. However, the estimate provides a basis from which to establish a decarbonisation target and is intended to be refined going forwards asmore data on the composition and use of the public sector fleet becomes available.

Table 6 - Estimate of public sector fleet emissions in 2025 (unrounded)

Vehicle Type	Average km	kgCO2e/km	Average emissions (non-ZE)	Total number of Non-ZE vehicles	Emissions from non-ZE fleet (tCO2e)
CAR	11,909	0.1645	1.96	6,205	12,156
VAN - 3.5t and under	16,000	0.2502	4.00	10,949	43,836
HGV	Not Applicable	Not Applicable	17.20	1,383	23,788
Gritter	Not Applicable	Not Applicable	13.50	261	3,524
Tipper	Not Applicable	Not Applicable	9.10	1,636	14,888
Street Sweeper	Not Applicable	Not Applicable	10.90	241	2,627
RCV	Not Applicable	Not Applicable	47.00	1,236	58,092
Ambulance	Not Applicable	Not Applicable	57.30	601	34,437

Vehicle Type	Average km	kgCO2e/km	Average emissions (non-ZE)	Total number of Non-ZE vehicles	Emissions from non-ZE fleet (tCO2e)
Bus Coach	30,000	1.25	37.50	281	10,538
Bus Minibus	18,000	0.2502	4.50	1,424	6,414
Fire Fighting Vehicle	Not Applicable	Not Applicable	5.20	741	3,853
Motorbike	Not Applicable	Not Applicable	1.00	85	85
Tractor	Not Applicable	Not Applicable	5.75	616	3,542
Miscellaneous	Not Applicable	Not Applicable	1.96	887	1,738
Grand Total					**219,516**

Setting a target for emissions reduction

There is much variety in the public sector fleet, both in terms of the types of vehicles in the fleet and the way in which they are used. Due to the specialist nature of some parts of the public fleet, it is expected that some vehicle types will decarbonise later than those for which zero-emission solutions are already tried and tested.

However, it is recommended to have one overall emissions reduction targets for the sector to work towards as a whole, rather than multiple targets for different vehicle types.

As a starting point, it is suggested that the overall decarbonisation of the public sector fleet should be at least as ambitious as the Outcome set out in the Climate Change Plan:

"Outcome 5: We will work with the energy, finance and road transport sectors and related businesses to ensure all road vehicles are zero emission by 2040"

This recognises that significant progress has already been made in the decarbonisation of cars and vans in the fleet in particular, but that it is likely to take

longer for zero-emissions solutions to be adopted for heavier and specialist vehicle types.

Pathway for decarbonisation

In order to develop a pathway for public sector fleet emissions, assumptions are made about the rate at which vehicles could be decarbonised, as summarised in the table below. These figures are drawn from a March 2026 report commissioned by Transport Scotland and prepared by EST, *Scottish public sector fleet electrification: Market readiness and forecasted additional costs*.

Table 7 - Assumed pathway to all vehicles being decarbonised

% zero-emission	2030	2035	2040
Car	100%	100%	100%
Van <3.5t	100%	100%	100%
HCV	17%	66%	100%
Bus/Coach	50%	100%	100%
Specialist	5%	35%	100%
Heavy emergency	0%	20%	100%

Future EV uptake rates are then applied to the 2025 EV uptakes rates and estimated levels of emissions to produce an emissions pathway.

Of course, there is some uncertainty in the baseline level of emissions and the actual rate of uptake may differ from that suggested below, however this provides the basis for a draft target which can be used to start the discussion with stakeholders. The results are provided in the following table. In summary, applying the assumed future EV uptake rates to the current fleet suggests:

An overall pathway of emissions reduction for the public sector fleet of:

- 34% reduction in emissions by 2030 vs 2025
- 62% reduction in emissions by 2035 vs 2025
- 100% reduction in emissions by 2040

Table 8 - Emissions reduction as a result of decarbonising public sector fleet

Emissions (tCO2e)	2025	2030	2035	2040
CAR	12156	0	0	0
VAN - 3.5t and under	43836	0	0	0
HGV	23788	19801	8111	0
Gritter	3524	3347	2290	0
Tipper	14888	12455	5102	0
Street Sweeper	2627	2599	1778	0
RCV	58092	56036	38340	0
Ambulance	34437	33151	22682	0
Bus Coach	10538	5325	0	0
Bus Minibus	6414	3254	0	0
Fire Fighting Vehicle	3858	3853	3083	0
Motorbike	85	0	0	0
Tractor	3542	3387	2317	0
Miscellaneous	1738	893	0	0
Total	219,516	144,101	83,704	0
% change vs 2025	0%	-34%	-62%	-100%

Comparison with CCP pathway for road transport

Table 9 - Emissions reduction (%) vs 2025

	2030	2035	2040
Public sector fleet	-34%	-62%	-100%
CCP all road transport	-31%	-64%	-86%

Following the approach above, the pathway for emissions reduction in the public sector fleet is ultimately more ambitious than the pathway assumed for all road transport in the CCP.

Annex 4: Further reading and examples of solutions

Transport Scotland have worked with Energy Savings Trust to develop and publish a toolkit to support fleet decarbonisation. The toolkit includes extensive guidance and highlights decarbonisation case studies. Below are some examples of guidance and case studies that are available in the Fleet Decarbonisation Toolkit.

- Understanding the total cost of ownership for EVs.
- Adopting Heavy Duty Vehicles (HDVs) into fleets
- Scottish Water's journey to decarbonise its fleet
- Shared car use
- Fleet rationalisation and energy efficiency improvements
- Insuring depots and EVs
- Sharing depot charging case study – First Bus

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