



# POWER POLITICS

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Emerging insights into climate lobbying in Scotland

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# INTRODUCTION

Extensive research and extreme weather incidents have laid bare the intense and devastating effects of climate change.<sup>1</sup> Scientists have repeatedly stressed the importance of keeping warming to below 1.5c to alleviate the greatest consequences of this process, such as intense heatwaves, loss of wildlife, and rising sea levels.<sup>2</sup>

Governments around the world pledged to address rising temperatures by signing the legally-binding Paris Climate Agreement.<sup>3</sup> The UK and Scottish Parliaments have gone further, setting their own statutory targets to reducing greenhouse gas emissions – pollution that contributes to global warming.<sup>4</sup> Translating these international treaties and domestic laws into impactful policy is, however, proving to be a challenge.

Overall, the pace of change has not been fast enough to meet the level of policy ambition. In 2024, Scottish ministers claimed their plan for reducing emissions by 75 per cent before 2030 was no longer feasible.<sup>5</sup> The Climate Change Committee, responsible for overseeing Britain's efforts to deliver its 'net zero' ambitions, also assessed that the UK Government did not have credible plans for delivery.<sup>6</sup> This begs the question, why?

Delivering on commitments to net zero involves governments navigating the various vested interests at play. In the short-term, net zero policies may affect some companies' bottom line, particularly those heavily invested in the oil and gas sector or industries whose use of oil and gas based products is essential to their operations, and require major shifts in operating models. With directors responsible for maximising shareholders' return, it could be argued there is an incentive for some to minimise the impact of new laws, regulations and policies designed to deliver a just transition, even if their public statements are supportive of these measures.<sup>7</sup>

Scotland provides an important case study for exploring these dynamics given:

- historically, it has been a major producer of oil and gas<sup>8</sup>
- the oil and gas sector supports 93,600 jobs in Scotland, and around 220,000 across the UK<sup>9</sup>
- a decline in industrial employment opportunities in Scotland makes a just transition a key driver of economic growth
- Holyrood has some devolved powers to manage renewable energy in Scotland, with decisions for oil and gas licensing remaining in Westminster

While lobbying is key part of the political process, allowing companies and others to make their voice heard, it can distort democracy and undermine public trust if:

- it happens behind closed doors, reinforcing perceptions of backroom deals
- money buys privileged access and potential influence with decision-makers
- governments and parliamentarians only listen to a small and narrow group of stakeholders

Bringing lobbying out of the shadows would reduce the risk of policy capture; ensure openness and accountability in policy delivery; push for power to be shared beyond a narrow elite; and expose where there are and are not equal opportunities to inform decision making.

This briefing provides insights into lobbying on climate issues in Scotland, identifying areas of risk that need further investigation. The data used in this analysis is freely available at

[www.openaccess.transparency.org.uk](http://www.openaccess.transparency.org.uk).

# SUMMARY OF FINDINGS

Analysing publicly available data on UK climate-related lobbying between 2018 and September 2024, we found:

## **Across the whole of the UK, there are a small group of big companies with privileged access to ministers**

1 in 10 UK and Scottish ministerial engagements are with just 10 companies, all of whom are either fossil fuel majors, or involved in energy generation or transmission.

## **Lobbying in Scotland is also dominated by corporate interests**

Two in every three recorded lobbying engagements in Scotland were with companies, trade associations and consultant lobbyists.

## **With fossil fuel lobbyists using key narratives to make the case for delaying more radical policy**

Key oil and gas majors and their trade associations, frequently cite the UK's need for an 'energy mix' and the industry's role in providing 'energy security' as part of the just transition to net zero.

## **But civil society is given more of a hearing proportionally by Scottish ministers than their UK counterparts**

Almost one in five engagements with Scottish ministers were with civil society organisations, compared to only one in ten in Whitehall.

## **And the most frequent topic of discussion with Scottish decision-makers is renewable energy and the energy transition to net zero**

Just over half of engagements had descriptions that broadly covered renewable energy or the energy transition to net zero, both of which are devolved policy areas, although there were also a sizeable number of discussions covering reserved matters relating to oil and gas exploration, suggesting attempts by the fossil fuel industry to lobby Westminster indirectly.

## **Yet we can only see part of the picture, with substantial evidence gaps due to major loopholes in the law**

Unlike the US, Canada, Ireland and the EU, UK and Scottish lobbying disclosures do not include:

- details of phone calls or written communications
- meaningful information about the legislative, policy, planning or government spending decision being targeted by the lobbying
- information about lobbyists' spending

# NOTES ON THE DATA

Data for this paper comes from two sources: UK ministerial departmental disclosures and the Scottish statutory lobbying register, covering data from March 2018<sup>10</sup> to September 2024.

In total, these data cover 7,009 engagements in Scotland and, where used for comparative purposes, 14,300 with the UK Government.

We have produced a pipeline to collect, standardise and re-publish this data on a single, free-to-use platform called Open Access, which is available at <https://openaccess.transparency.org.uk/>

Processing these data for our analysis involved five principal stages:

**Categorising lobbying activity:** Using a series of machine learning and generative AI tools, we tagged all lobbying meetings across the UK and Scotland where they related to four key policy areas: climate, defence, housing and health. For this analysis we focused only on those that related to climate policy.

**Re-shaping the data:** Where there were two or more lobbyists or advocacy targets in a meeting, we split these entries into separate rows, using Named Entity Recognition (NER) techniques for the UK Government data. Therefore, the headline statistics in the paper count ‘engagements’ as the number of interactions between lobbyists and their targets, which could involve several lobbyists in one meeting.

**Standardising the lobbyists:** The UK Government data is free text and does not standardise the names of lobbyists; for example, BP could be spelt ‘British Petroleum’, ‘British Petroleum (BP)’ and ‘BP PLC’ etc. To provide a holistic view of their activity, we had to reconcile these various identities into one using OpenRefine and AI tools.

**Categorising the lobbyists:** Using machine learning tools and human quality assurance, we categorised lobbyists into a high-level set of labels; for example, private companies, trade associations, charities etc.

**Categorising the engagements:** Using machine learning tools and seeded clustering techniques, we grouped the topics under discussion between lobbyists and their targets around ten broad thematic areas:

- renewable energy and transition
- airport decarbonization and recovery
- youth engagement and campaigns
- energy efficiency and fuel poverty reduction
- sustainable public transport policies
- sustainable business practices net zero
- whisky industry sustainability and challenges
- agricultural funding and sustainability
- climate change emissions targets bill
- decarbonizing rural heating systems.

# MAIN FINDINGS EXPLAINED

## Across the whole of the UK, there are a small group of big companies with privileged access to ministers

1 in 10 UK and Scottish ministerial engagements are with just 10 companies, all of whom are either oil and gas majors, or involved in the generation and transmission of energy.

In 2023, these companies' combined post-tax profits totalled over £40 billion, with projects and investments spanning the globe – from the North Sea to Nigeria and the Caspian. Together, annual global greenhouse gas emissions reported by these companies far exceeds that of the UK.

Their engagement with governments includes both direct meetings with ministers as well as indirect engagement via trade associations and consultant lobbyists, many of whom employ former political advisors of the party of government they are seeking to influence. For example, BP engages governments directly; indirectly via trade associations, including Offshore Energies UK (OEUK),<sup>11</sup> the Aberdeen & Grampian Chamber of Commerce,<sup>12</sup> and the UK Petroleum Industry Association (UKPIA);<sup>13</sup> and through consultant lobbyists, including Portland, Crowne Associates, and True North (Scotland).<sup>14</sup> Similarly, Shell lobbies directly; indirectly through trade associations, like Energy UK;<sup>15</sup> and with the assistance of consultant lobbyists, also including True North (Scotland).<sup>16</sup>

This shows those with deep pockets and a major role in producing greenhouse gas emissions have a sophisticated and multi-pronged lobbying strategy, aided by those who boast a wealth of contacts in politics.



## Lobbying in Scotland is also dominated by corporate interests

Two in every three recorded lobbying meetings in Scotland were with companies, trade associations and consultant lobbyists.

Five of the ten most active lobbyists on the Scottish register are energy companies and their trade associations. This includes the fossil fuel major BP, and Centrica, the UK's largest gas distributor to residential customers.<sup>17</sup>

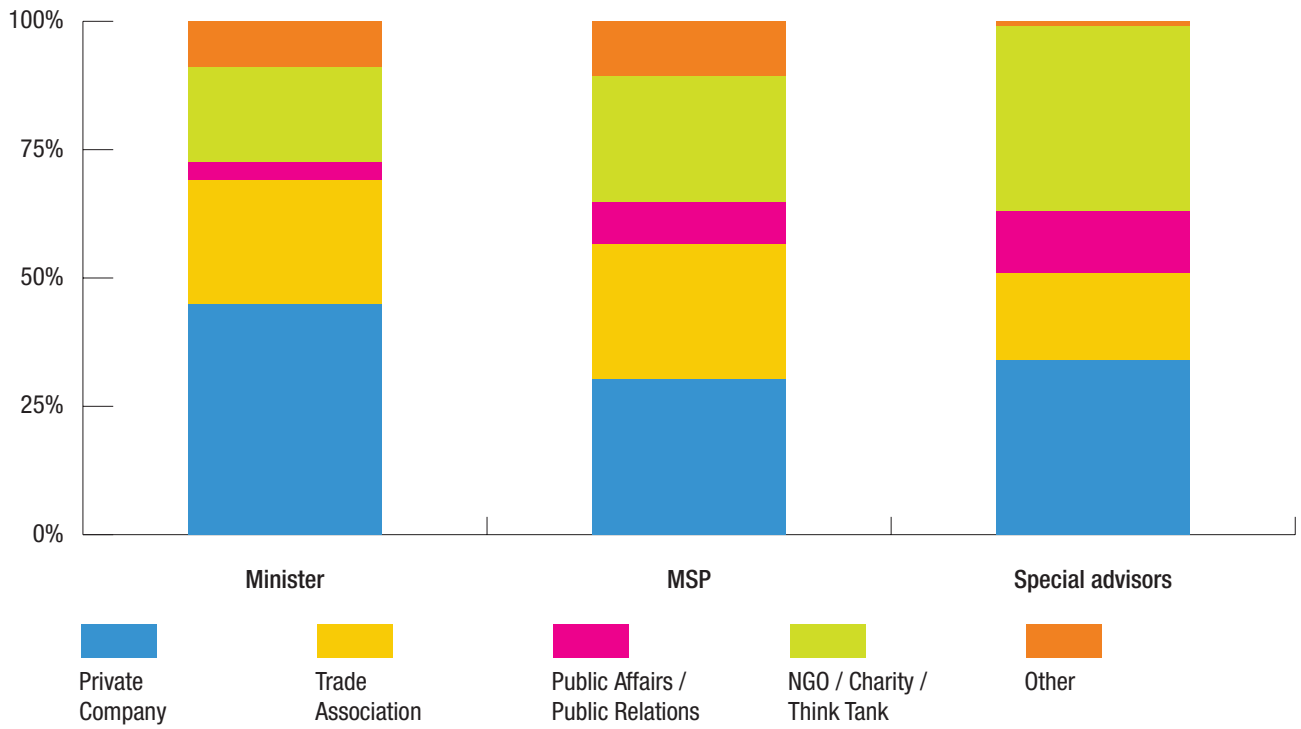
When looking at just ministerial engagements, companies and their trade associations account for seven out of the top ten most frequent visitors. Only four non-profits make this top ten: the RSPB Scotland, WWF Scotland, and the Energy Transition Zone Limited (ETZ), a not-for-profit vehicle used for redeveloping brownfield land into a hub for hydrogen, offshore wind and carbon capture and storage,<sup>18</sup> and Scottish Environment LINK.<sup>19</sup>

Proportionally, non-profits have a greater audience with MSPs and Special Advisors, who can be influential in shaping policy and ministerial decisions (see Chart 1). However, most of the activity from this sector is concentrated in a relatively small group of organisations, ten of whom account for just under two thirds of all climate lobbying by non-commercial entities.

There are some caveats to these figures and their implications. Smaller organisations with less than 10 employees are exempt from reporting their lobbying activity.<sup>20</sup> Similarly, lobbyists do not need to register their parliamentary engagement through cross-party groups (CPGs), including the CPG on Oil and Gas.<sup>21</sup> Also, written communications and those made by phone call are not reportable currently,<sup>22</sup> and neither is spending on these activities. This means we still do not have a full picture of what is happening in Holyrood.

Access does not necessarily equate to influence – it is possible to have one organisation with greater impact than a hundred – and the quality of these engagements vary significantly. Some are one-on-one conversations or bespoke site visits, while others are more fleeting discussions at party conferences or the Royal Highland Show. Yet based on what we do know, there is a risk that some voices are heard louder than others not because they have the better evidence or argument, but because they can afford to talk more frequently and in greater detail to a more influential group of advocacy targets.

Chart 1: Proportion of climate lobbying in Scotland by sector and official, March 2018 - September 2024 (Source: Scottish lobbying register)





## With fossil fuel lobbyists using key narratives to make the case for delaying more radical policy

Key fossil fuel majors and their trade associations, frequently cite the UK's need for an 'energy mix' and the industry's role in providing 'energy security' as part of the just transition to net zero.

Analysis by InfluenceMap, a think tank monitoring climate lobbying, shows that for decades these companies have deployed a range of key arguments to advance their policy objectives, including delaying or stopping measures that would affect their bottom line, even if the consequences are more damaging for the environment.<sup>23</sup> These fall into three broad categories:

1. policy neutrality
2. solution skepticism
3. affordability and energy security

See overleaf for more details.

Our analysis of the data found these arguments in lobbying disclosures, particularly narratives 2 and 3.

Oil and gas majors and their trade associations often mention the need for an energy mix to provide energy security, alongside comments around local employment. These talking points are also used in conjunction with criticisms of government policy; requests for financial support; and/or the benefits of yet-to-be proven technology as a net zero solution, such as carbon capture and storage. Given those deploying these arguments also have some of the most privileged political access in Scotland, there is a risk their positions form a dominant narrative in policymakers' eyes, despite conflicting with science-aligned climate policy.

*"We discussed the importance of the oil and gas supply chain to Scottish and UK jobs and manufacturing as well as the Energy Transition including carbon capture usage and storage (CCUS)."*

**Engineering firm**

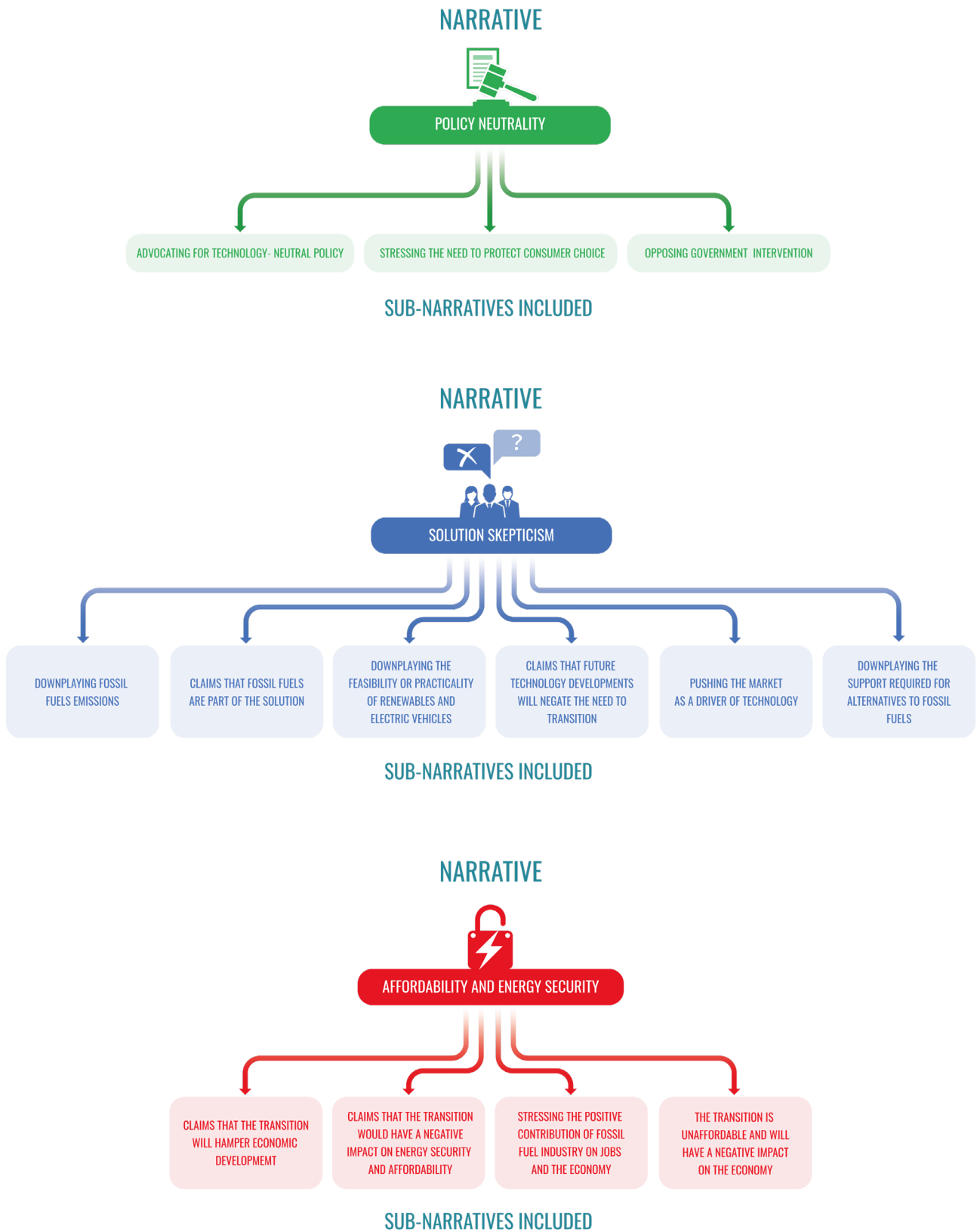
*"We specifically covered: the Energy Profits Levy; licensing protecting and maintaining jobs and skills in energy communities; and the industry's role in delivering a just transition."*

**Oil and gas trade association**

*"We outlined our concerns about the fiscal environment specifically the impact of the energy profits levy (EPL) on the sector. We outlined our contribution to the energy transition through our investment in carbon capture and storage (CCS)."*

**Major oil and gas company**

Figure 1: Fossil fuel playbook narratives (Source: InfluenceMap at <https://influencemap.org/>)



## But civil society is given more of a hearing proportionally by Scottish ministers than their UK counterparts

Almost one in five meetings with Scottish ministers were with non-profits, compared to only one in ten in Whitehall.

Given the legal exemption for small organisations under Scotland’s lobbying laws, this could be a slight under-representation of the real figures. We cannot tell from the data alone why these groups get a better hearing than in Westminster, but it could likely reflect the founding intent of the Scottish devolution settlement to have a more open and inclusive political process.

We also know far more about the lobbying of parliamentarians in Scotland than Westminster. South of the border, transparency disclosures relate to meetings with ministers, not members of the legislature. Unlike Scotland, Ireland, Canada and the US, there are no records of those briefing MPs and Lords on laws before Parliament or on government policy.

In Holyrood, overall NGOs have a higher success rate securing an audience with MSPs compared to ministers. Proportionally, the Greens give this sector the biggest hearing, accounting for just over half (52 per cent) of their engagements with lobbyists on climate issues (see Chart 2). Looking at overall picture, levels of engagement on climate issues by all sectors are roughly in proportion to the size of political parties’ representation in Holyrood i.e. no party is the subject of unusually high or low levels of lobbying in this policy area (see Chart 3).

Chart 2: Proportion of climate lobbying in Scotland by party and sector, March 2018 - September 2024 (Source: Scottish lobbying register)

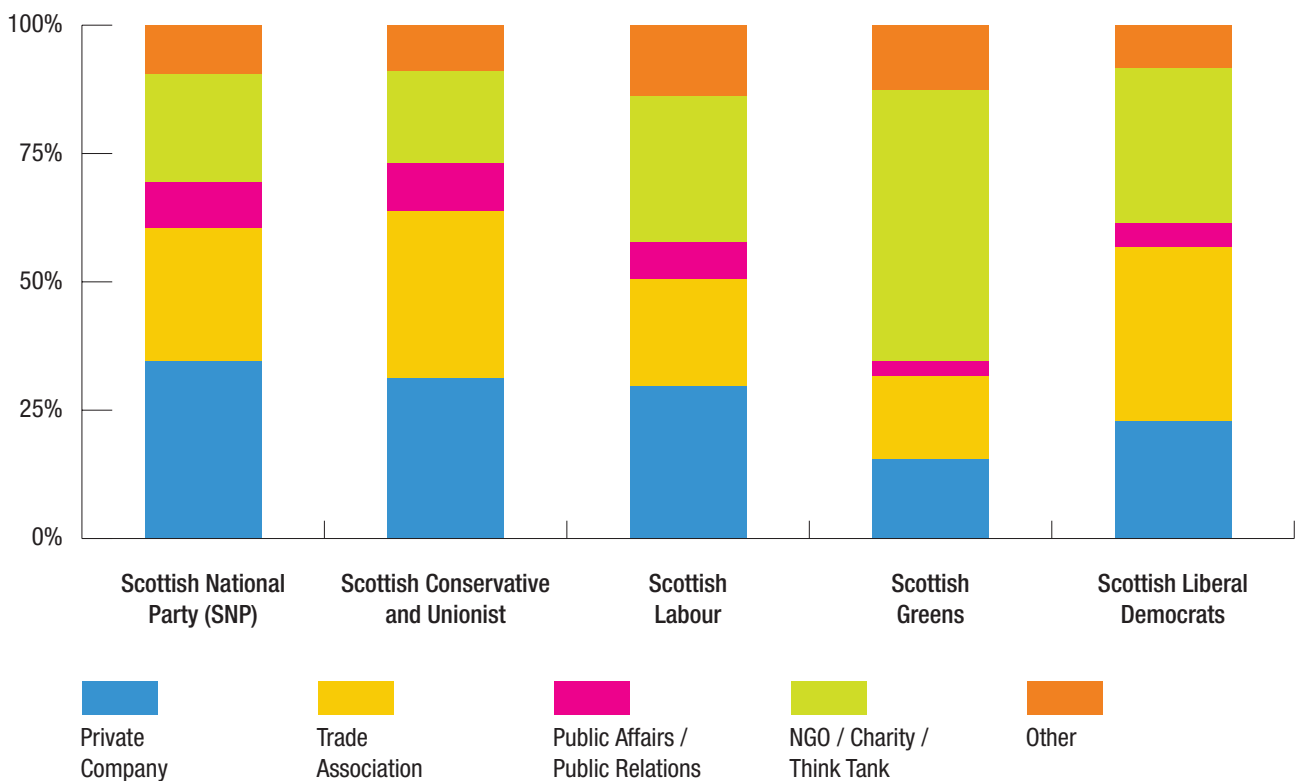
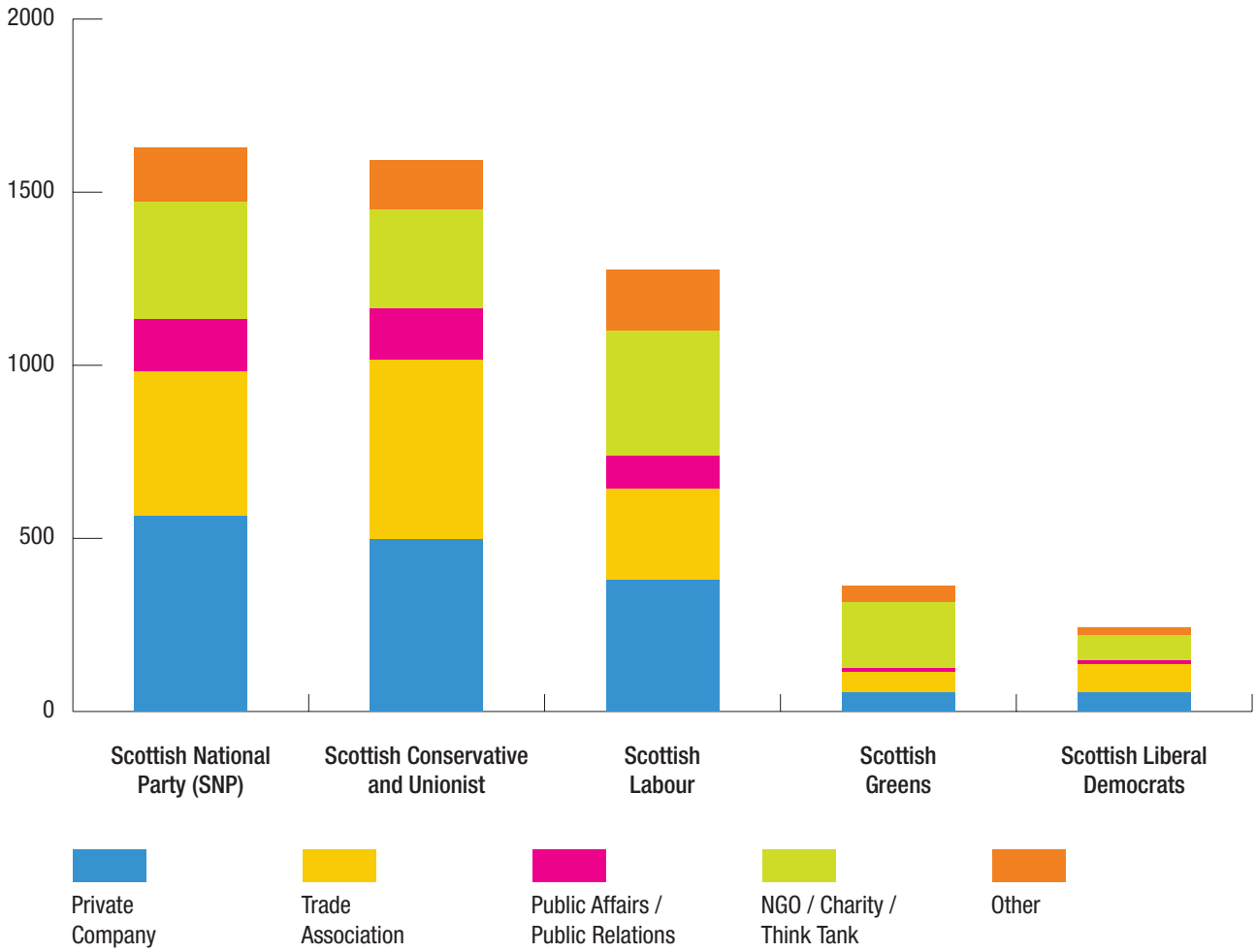


Chart 3: Number of lobbying engagements with MSPs by sector, March 2018 - September 2024 (Source: Scottish lobbying register)



## And the most frequent topic of discussion with Scottish decision-makers is renewable energy and the energy transition to net zero

Just over half of meetings had descriptions that broadly covered renewable energy or the energy transition to net zero (see Figure 2).

This is perhaps unsurprising given renewable energy is an area of devolved competency for Scotland. However, within this are a range of conversations, not all of which immediately seem relevant. For example, there are several covering the benefits of carbon capture processes; the oil and gas sector's role in the UK's energy transition; and the benefits of the fossil fuel sector to the Scottish economy. As we highlight above, these are all talking points used by the industry to further their interests.

The reason why they have fallen into this broad topic category is because of the way lobbyists report their activities. Unlike the US, Canada, Ireland and the EU, which require lobbyists to be more specific about the objectives – for example, the legislation or government policy they are trying to influence – the Scottish system just requires them to provide a narrative description of their engagements. Consequently, there appears to be a tendency for some to use climate-friendly buzzwords and phrases to burnish their credentials with their advocacy targets.

This does not completely undermine the usefulness of these disclosures. While we might have to dig deeper to find more detail about what these organisations are really trying to influence, it does give us a window into how key industries present their engagement on climate issues. Where their private policy positions conflict with their public advocacy, there is an opportunity to challenge them. For an example of this analysis visit

[www.influencemap.org](http://www.influencemap.org)

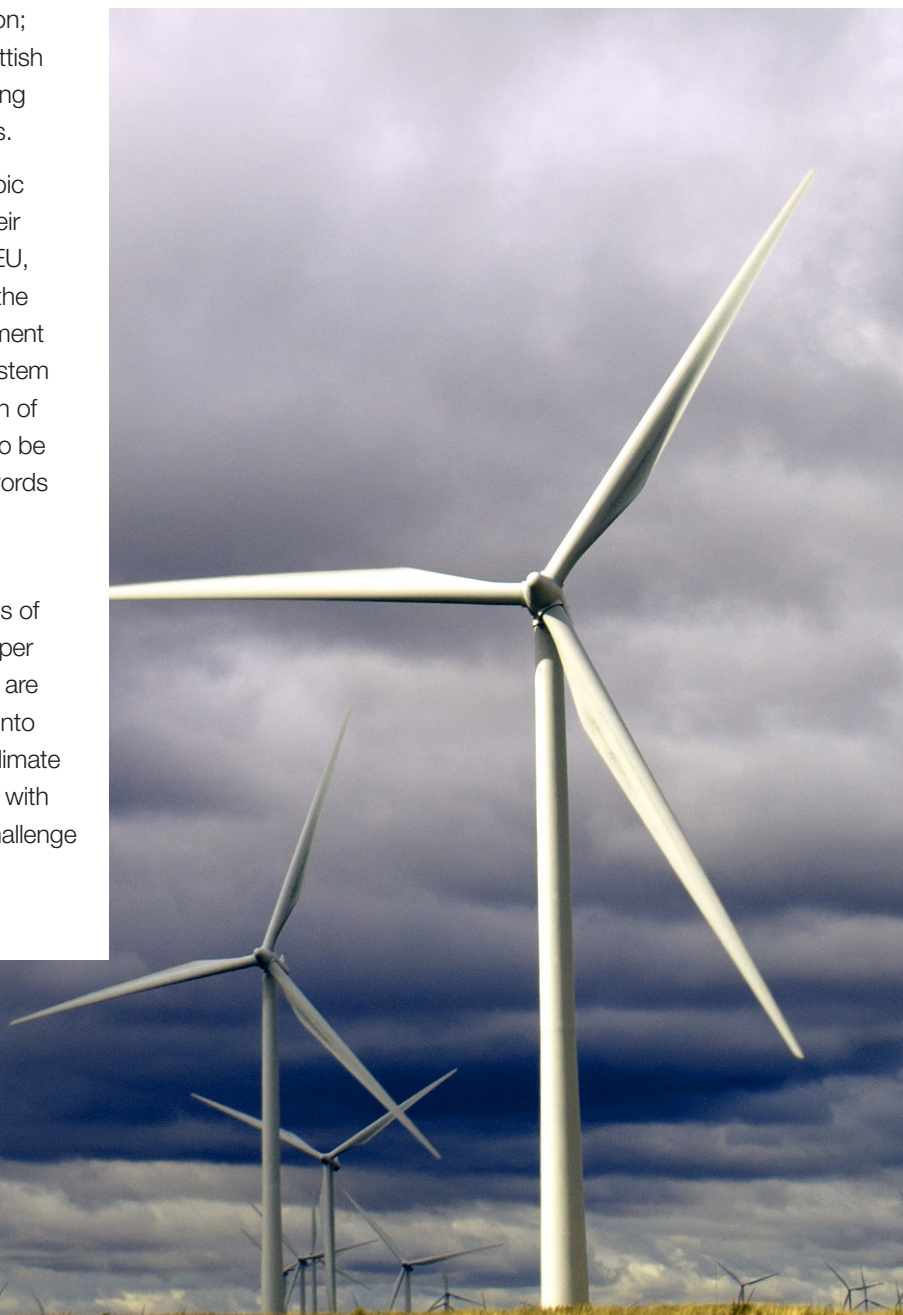
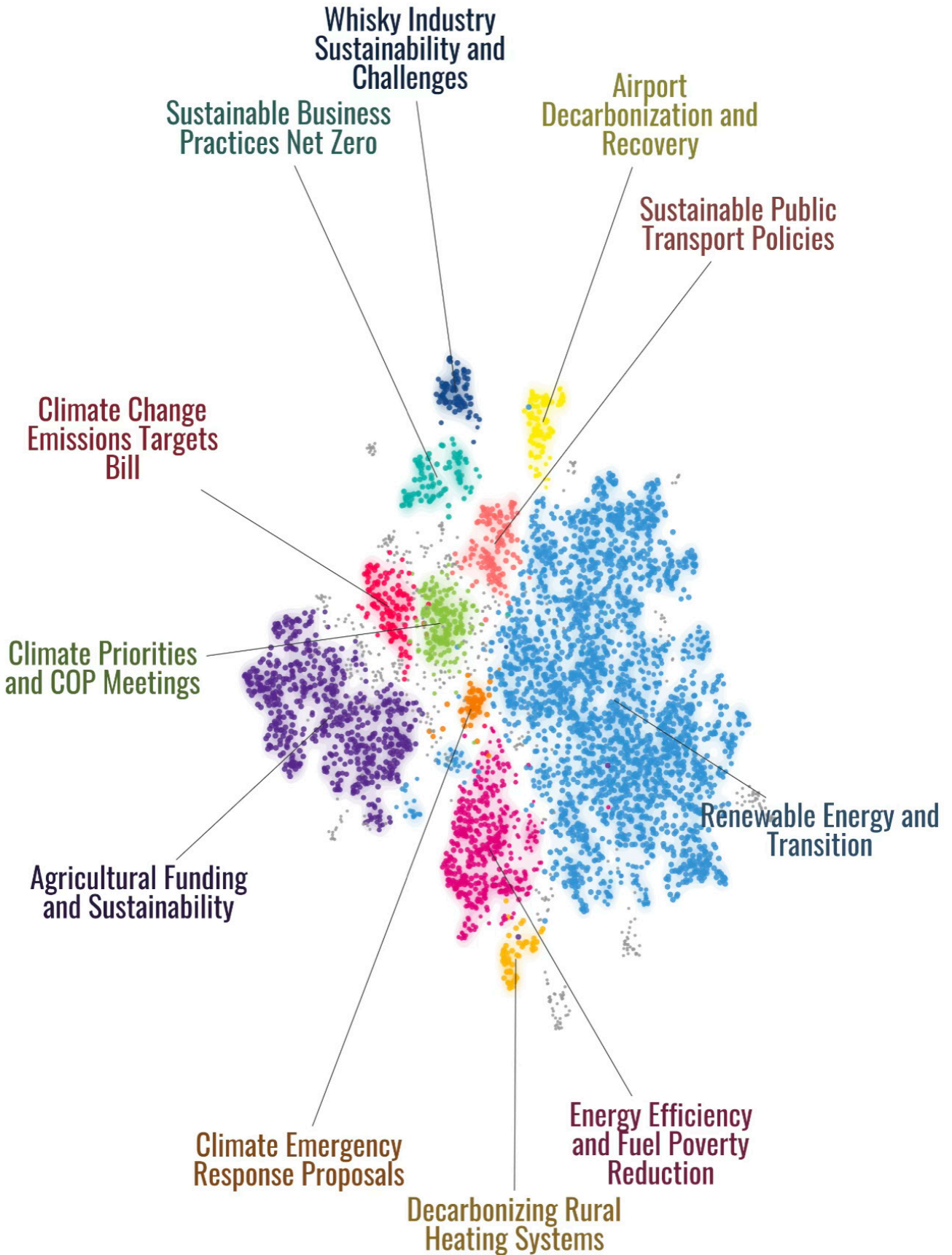


Figure 2: Scottish lobbying meetings clustered by purpose of discussion, March 2018 - September 2024 (Source: Scottish lobbying register)



# ENDNOTES

- 1 <https://www.metoffice.gov.uk/blog/2025/los-angeles-wildfires-climate-change-has-increased-fire-risk-over-recent-decades#:~:text=Climate%20change%20has%20driven%20a,with%20the%20aftermath%20of%20destruction.> [accessed: 20 January 2025]
- 2 <https://www.bbc.co.uk/news/science-environment-45775309> [accessed: 20 January 2025]
- 3 <https://unfccc.int/process-and-meetings/the-paris-agreement> [accessed: 22 January 2025]
- 4 Climate Change Act 2008 <https://www.legislation.gov.uk/ukpga/2008/27/contents> ; Climate Change (Scotland) Act 2009 <https://www.legislation.gov.uk/asp/2009/12/contents>
- 5 <https://www.bbc.co.uk/news/av/uk-scotland-68848800> [accessed: 3 February 2025]
- 6 <https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/> [accessed: 31 January 2025]
- 7 <https://influencemap.org/pressrelease/New-Study-58-of-Top-Companies-Climate-Commitments-Clash-with-Their-Own-Corporate-Lobbying-Activities-24831> [accessed: 20 January 2025]
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- 9 <https://fullfact.org/economy/sunak-scotland-oil-jobs/> [accessed 28 January 2025]
- 10 Scotland's lobbying register went live in March 2018.
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- 16 <https://www.lobbying.scot/SPS/InformationReturn/SearchInformationReturnDetail/48787> ; [https://orcl.my.site.com/CLR\\_Client\\_Profile?Id=a08Tu00000CuPzMIAV](https://orcl.my.site.com/CLR_Client_Profile?Id=a08Tu00000CuPzMIAV) [accessed: 24 January 2025]
- 17 Centrica PLC, *Annual report 2023* p.7 <https://www.centrica.com/media/op3lyz33/centrica-annual-report-2023.pdf>
- 18 <https://etzltd.com/about-etz/about-etz-ltd> [accessed: 24 January 2025]
- 19 There are 11 organisations in the top 10 because some share the same number of visits; for example, the Aberdeen & Grampian Chamber of Commerce and Scottish Environment LINK both have 21 ministerial engagements since 2018.
- 20 Paragraph 7 of Schedule, Lobbying (Scotland) Act 2016 <https://www.legislation.gov.uk/asp/2016/16/schedule> [accessed 28 January 2025]
- 21 Paragraph 13 of Schedule, Lobbying (Scotland) Act 2016 <https://www.legislation.gov.uk/asp/2016/16/schedule> [accessed 28 January 2025]
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