



Scottish Environment LINK's response to *Making things last: Consultation on creating a more circular economy in Scotland*

Scottish Environment LINK welcomes the opportunity to respond to the Scottish Government's consultation: '*Making things last: Consultation on creating a more circular economy in Scotland*'. LINK has been holding internal discussions with our members about the circular economy, through a survey (over 80% response rate from members) and a workshop which have informed this response.

General comments

Scottish Environment LINK applauds the Scottish Government's interest in developing a circular economy and its determination to take a leading role internationally in promoting the concept. We believe that there are potentially major benefits for the environment and wellbeing from a fully-developed circular economy, where this seeks to achieve substantial overall reductions in the volume of materials consumed. However, we feel that these benefits will only be achieved if government takes a more rigorous and comprehensive approach than that set out in the consultation document. In particular it is important that:

- A reduction in the impact that our economy has on natural resources (and associated biodiversity) is the main aim of the circular economy;
- Metrics are developed which include assessments of our material, land, carbon and water footprints;
- The application of the concept is comprehensive and its principles applied to all areas of the economy and across all departments of Government;
- The powers and responsibilities of all levels of government to move us towards a circular economy are clearly set out.

The need for principles, targets and measurement

We have noted that interpretations of the circular economy vary by sector and that this document appears to be largely shaped by the priorities of waste management and reduction. If the circular economy is to become a national strategy which we can enthusiastically endorse, it needs to be given a more holistic perspective on how our economy as a whole can be developed in harmony with our environment and within its constraints.

This will require the development of clear principles, targets and metrics for a Scottish approach to the circular economy, to guide the development of policy instruments and against which progress can be assessed. We believe that such principles form an important part of the "progressive agenda"; fit within the development of European Union initiatives; and are fully compatible with the

UN's Sustainable Development Goals, to which the Scottish Government is signatory.

We think it important and useful to state how a circular economy fits into the concept of Sustainable Development, highlighting that the economy should contribute to social wellbeing without over-exploiting the environment, which underpins both our economy and wellbeing.

We would like to see a clear upfront recognition that Scotland has to achieve an overall reduction in consumption of natural resources. This is, for example, clearly stated in the first section of the EU Roadmap for a Resource Efficient Europe, 2011, which sets out the "Challenges and Opportunities for Europe". The second paragraph states:

"Sources of minerals, metals and energy, as well as stocks of fish, timber, water, fertile soils, clean air, biomass, biodiversity are all under pressure, as is the stability of the climate system. Whilst demand for food, feed and fibre may increase by 70% by 2050, 60% of the world's major ecosystems that help produce these resources have already been degraded or are used unsustainably. If we carry on using resources at the current rate, by 2050 we will need, on aggregate, the equivalent of more than two planets to sustain us, and the aspirations of many for a better quality of life will not be achieved."

The document refers in Paragraph 10 to the existing (linear) economic model as "take, make and dispose": a summary also used elsewhere. This misses out the essential stage of "use", without which the other stages are pointless. This is a key stage which we need to extend, away from built-in obsolescence and short-term fashions, by making things to higher quality and then repairing them. And we also want to broaden it, by sharing products. And only then should they be reconditioned or recycled.

The need to be comprehensive

In our view, it is essential that the circular economy and its principles be extended across all relevant areas of policy and to all use of natural resources. However treatment in the consultation document is only partial. For example, whilst Figures 1 & 4 both show renewable energy, there appears to be no reference to it elsewhere in the document and there should be an indication of where this fits, and a cross-reference to the relevant energy strategy.

We note that some other areas of the circular economy are given scant attention in the document. For example the built environment embeds enormous quantities of material and carbon and, in a circular economy, building

conservation and restoration would replace demolition and rebuild. Agricultural activity and food production are also missing, despite the mention of phosphorus as one of the critical materials. Returning nutrients to the soil is an important aspect of the circular economy through 'closed loop' farming using agro-ecological principles. Maximum sustainable yields should be an aspect of the circular economy, ensuring that terrestrial, marine and freshwater environments are not over-exploited.

Give priority to sustainability objectives

A related concern is the basis on which the government is prioritising aspects of the circular economy on which to focus. We concur that there are a suite of advantages that the circular can offer, as in paragraph 16, and these logically form the basis of prioritisation. However, it should be acknowledged that at times there will be conflict between these. We would like to see *tackling climate change and preserving natural capital* at the top of this list and to be the main driver in determining priority areas.

We also note that there are social benefits of a circular economy: social capital related to networks, and health and wellbeing related to an enhanced environment. Social benefits could be a sixth point in paragraph 16 and be acknowledged as an important outcome from a more circular economy.

Regulations and fiscal incentives

We recognise the progress which can be made by promoting different business models and working with companies to find the win/win solutions which improve business performance and reduce resource use. However we do not think that that approach can drive change fast enough or far enough to respond to these challenges. The needs for government regulation and intervention should be clearly identified.

Conclusion

Overall, we welcome the circular economy as an opportunity to align business and environmental benefits, but regret that much of the argument in the consultation document seems to be limited to the former. The approach could be used to create broader public understanding of the dependence of our economic prosperity on natural resources and ecosystem services, and of the need to protect and nurture these. We are aware of voices suggesting that environmental arguments for the circular economy should be dropped in favour of the business case. We believe this would be a severely regressive step, and all stakeholders should be emphasising *both* the environmental and business arguments.

We welcome the publication of the consultation paper at this time as it demonstrates that the Scottish Government are ahead of the curve with regard to developments across the European Union, but we note that the EU are due to publish the details of their “strengthened” circular economy proposals in November 2015. We hope that Scotland will continue to take a lead in pursuing this hugely important initiative – whilst taking account of our EU obligations.

Responses to specific questions

Chapter 3

A Design of products, business models, services, and systems

- We agree with SG aspirations.
- We would like to see policy changes such that any public support for enterprises should include ‘potential circularity’ of the product or service, which would include the design, as a criteria for support.
- Public procurement should also include the same criteria.

B Extending the life of goods through reuse

- We welcome measures to recycle and repair but would like to see more explicit commitment to reduce resource use by having this as a section heading, showing how overall reduction in resource use would be achieved.
- We would like to see policy changes such that any public support for enterprises should include ‘potential circularity’ of the product or service, which would include the potential for reuse, as a criteria for support.
- Public procurement should also include the same criteria.

C Extending the life of goods through repair by businesses, community organisations and individuals

- We agree with SG aspirations.
- We would like to see policy changes such that any public support for enterprises should include ‘potential circularity’ of the product or service, which would include the potential for repair, as a criteria for support.

D Promoting remanufacturing

- We agree with SG aspirations

E Expanding recycling and improving the quality of recycled materials

- We agree with SG aspirations and in particular urge the Scottish Government to vigorously pursue a universal deposit return system (DRS) for drinks containers because this will reduce litter, tackle climate change and boost recycling rates as well as contributing to the circular economy.

F Producer Responsibility for reuse and recycling

- We agree with SG aspirations.
- We believe that it is the responsibility of all producers to consider the reuse and recycling potential of their products.

G Recovering value from biological resources

- We agree with SG aspirations.
- We are concerned that in this area particularly the quest to find 'high value' uses for biological resources may obscure their benefit to restoring and maintaining soil and other resource bases whose value is often outwith the market.

H Energy recovery

- We agree with SG aspirations.

I Landfill

- We agree with SG aspirations.

Chapter 4

A Communication

- We agree with SG aspirations.
- We would also like to see communications which raise awareness of the environmental and resource impacts of our current economic model and

the need to mitigate these by moving away from our ‘throwaway culture’. These messages will help to reinforce the argument to make the significant changes which are hoped for.

- As well as working with various agencies, we think it important to work across the Scottish Government to embed circular economy thinking into Government functions.

B Skills

- We agree with SG aspirations.
- We suggest giving attention to how the jobs market is likely to be restructured, with some job losses balanced by new jobs in repair, reuse, remanufacturing, and recycling, often local jobs.

C Measurement

- We welcome the development of the carbon metric for measuring waste, and would like to see this taken forward along with the use of footprint methodologies to measure the use of carbon, materials, land and water. We strongly feel that resource efficiency measures are not adequate to assess impact on natural resources and that footprint metrics, production and consumption based, are needed.

The following LINK members have signed up to this consultation response:

Amphibian and Reptile Conservation

Association for the Protection of Rural Scotland (APRS)

Badenoch and Strathspey Conservation Group

Buglife

Butterfly Conservation Scotland

Friends of the Earth Scotland

Froglife Trust (Scotland)

Hebridean Whale and Dolphin Trust

Marine Conservation Society

National Trust for Scotland

Plantlife Scotland

RSPB Scotland

Scottish Wild Land Group

Scottish Allotments and Gardens Society

Scottish Wildlife Trust

Soil Association Scotland

Whale and Dolphin Conservation

Woodland Trust Scotland

WWF Scotland