



**Scottish Environment LINK – Sustainable Scotland Task Force
Household Waste Prevention – Consultation response
April 2006**

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Scottish Environment LINK welcome the opportunity to respond to this consultation and re-iteration of the Executive's commitment to arrest the growth in municipal waste arisings by 2010 as set out in the National Waste Plan. We have long called for greater attention to be given to tackling waste arisings to complement the investment and progress that is being made in improving Scotland's recycling record.

Preventing waste at source will play an important part in meeting the aspirations of the Executive's recently published Sustainable Development Strategy 'Securing our Future' to reduce Scotland's footprint.

We support a number of the options proposed and have outlined those areas where action should be prioritised:

Summary:

- **Efforts to tackle waste arisings should be viewed in the context of the Executive's commitment to reduce Scotland's footprint.**
- **Scottish Enterprise should be tasked with a greater role in preventing waste.**
- **SEPA and Local Authorities could be given greater roles and responsibilities to deliver waste prevention and sure that the 2010 waste stabilisation target is met.**
- **Whilst maintaining momentum on improving recycling the Strategic Waste Fund should also prioritise efforts to prevent waste.**
- **A network, research centre or round table of sustainable consumption and production should be established in Scotland.**
- **A levy on plastic bags would be an important and iconic step in preventing waste.**
- **Greater opportunities should be used to use procurement as a lever to drive change.**

Scottish Environment  The voice of Scotland's environment movement

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Question 2: Should the Scottish Executive and SEPA carry out further work on “waste profiles” of products? If so, what? Options include:

- **Sponsoring work in Scotland to outline “waste profiles” of products.**
- **Sponsoring work in Scotland on “environmental profiles” of products. (“Environmental profiles” would consider environmental issues generally, not just waste). The ISO 14020 family of standards could offer an internationally agreed template for this work.**
- **Working with other Government Departments across the UK on either “waste profiles” or “environmental profiles.”**
- **Working with the British Standards Institution, and EU Standards bodies, to ensure that waste, or sustainability generally, forms part of the development of technical product standards.**

The environmental profile of a product incorporating waste or resource use implications would be welcome. This would enable consumers to make informed choices, stimulate the development of lower impact products and could be useful as a specification criteria in procurement policy.

Question 3: Do consultees consider that the Scottish Executive should take further action in relation to the life-span of products? If so, what? Options include:

- **Funding research in Scotland.**
- **Supporting research being carried out across the UK.**
- **Providing better information to consumers, at either Scottish or UK level, on estimated life-spans of products.**
- **Concentrating work on specific products (e.g. washing machines, cookers, electrical goods generally)**
- **Providing more support to companies making long-life products to an accredited standard, or to repair and refurbishment shops.**
- **Investigating ways to require longer product guarantees, and improve availability of spare parts. This work would need to be undertaken at a UK level as consumer protection is a reserved matter.**

We would support efforts to establish a network or roundtable discussion on sustainable consumption and production in Scotland and fund research in this area and note the publication of the SDC Roundtable report on sustainable consumption ‘I will if you will.’

Question 4: Bearing in mind that some products are always likely to be disposable, do consultees consider any action should be taken at EU, UK or Scottish level to minimise waste from disposable products? If so, what? Possible actions could include:

- *Voluntary agreements with manufacturers to minimise waste from disposable products (e.g. by reducing the size of such products or by only using disposable versions of the products where essential)*
- *Design for recycling.*
- *The introduction of producer responsibility legislation for disposable products.*
- *A levy on disposable products. This would require primary legislation, would take a number of years and could be disproportionate.*

Voluntary mechanisms need to be accompanied by legislative drivers and we support greater use of producer responsibility legislation and financial levers as a driver to reduce waste from disposable products.

Question 6: Do consultees consider that there is a need for guidance and support for retailers to build waste considerations into their procurement process? If yes, what guidance and support would be useful? It may be preferable to take this work forward at a UK, rather than Scottish, level.

Question 7: Do consultees consider that retailers and their employees could do with further training, support and guidance on waste issues? If so, what?

We would encourage a greater role for Scottish Enterprise in this area. Not only are they ideally placed to ensure that waste and resource are a focus for guidance and advice but also that good practice in this area is a pre-requisite for receiving support from Scottish Enterprise.

Question 11 – Do you think the Packaging (Essential Requirements) Regulations 2003 are working? If not, why not? What action could be taken to improve their operation?

These packaging regulations are not working effectively:

- i) Many products remain excessively packaged
- ii) Not one single challenge has been taken up in Scotland and barely any in England.
- iii) A lack of public awareness that the regulations exist and lack of understanding of process available for people to use them prevents uptake.
- iv) It would be difficult for a local authority to take on a challenge against a large business like a supermarket.

A number of steps could be taken to improve this situation including:

- i) Raising awareness of the regulations and how to use them.
- ii) Encouraging people to take up cases.
- v) Providing greater resources for enforcement.
- vi) SEPA should be resourced to assist local authorities in taking challenges under these Regulations.

Question 12: Could any further action be taken in Scotland to minimise household waste from packaging? If so, what? Options could include:

- ***Better information for consumers on the role packaging plays, how its environmental impact can be minimised, and what action they can take. This may be a role for Environment Direct – see paragraph 4.8 below.***
- ***Better information for consumers on how much of the retail price of a product relates to the packaging, rather than the product. Again, this may be a role for Environment Direct.***
- ***More work to mainstream product refill systems in Scotland (eg a feasibility study)?***

Information alone, whilst useful, is not sufficient. For product refill systems to work evidence suggests that incentives should accompany such a move to achieve behaviour change.

Obligations on retailers would also be required if this were to happen, as it is unlikely they would voluntarily opt into a system which requires staff time or storage capacity.

Question 13: Do consultees consider more could be done to encourage re-use either through deposit and return schemes or more generally? Options could include “reverse vending” trials in Scotland or trials of deposit and return schemes.

Reverse vending is worth exploring both to encourage greater recycling of products and also re-use. This has been trialled in a school in England and should be considered for roll out in Scotland.

Question 17. Do consultees consider that further action should be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services? Possible actions could include the provision of further information by Government, consumer bodies and retailers on how to complain about excessive packaging and waste.

See response to Q.11.

Question 18: Do consultees consider that environmental loyalty cards should be run in Scotland? It is likely that any such cards would have to be run by retail outlets. Is there any role here for the Scottish Executive and/or SEPA?

Question 19: Which of the above options would consultees prefer in relation to the use of plastic bags?

Question 20: What priority do consultees consider the Executive should give to reducing the use of plastic bags in the context of work to promote household waste prevention generally?

We supports the Plastic Bag Levy Bill proposal.

- It is a useful demonstration of how financial mechanisms can assist in delivering sustainability through taxing resource use, beginning to internalise environmental costs and stimulate behaviour change.

- The use of an estimated 1 billion plastic bags in Scotland per year is symbolic of our throwaway attitude to resource use. This represents both an unacceptable waste of natural resources (in both production and transportation), and disregard for the effects of such resource depletion and disposal on the environment and communities.
- Plastic bags constitute a hazard to wildlife and are a source of visual pollution.

A working group commissioned by the Australian Federal Government concluded that a mandatory levy would be the most effective option to reduce plastic bag use.

Whilst recognising that the levy would only tackle a component of waste arisings we believe that designed and implemented appropriately, with an accompanying education programme, it would be a highly symbolic step in raising awareness about the need for behaviour change and tackling a largely unnecessary product that is symbolic of our throwaway attitude to resource use.

As noted in a study of the Irish plastic bag tax one of the main objectives of the Minister in introducing the tax was to raise public awareness of the environment and the study reports that ‘it seems to have achieved this objective at very low net cost.’

The Irish study is reported to have resulted in a 90% reduction in plastic bag use, with some retailers reporting reductions of up to 99%.

Question 21: Do consultees consider that further action should be taken in relation to unwanted mail and leaflets? If so, what?

- Greater restrictions should be applied to unsolicited mail marketing.
- Organisations in contact with an individual could be required to ask them to opt-in to receiving such mail, rather than them having to opt –out.
- At a minimum greater promotion of the Mailing Preference Service could improve take up.

Question 29: Do consultees consider that there would be merit in a similar approach to Barnet’s (making use of certain receptacles mandatory, to encourage recycling) being adopted by local authorities in Scotland? Clearly, before authorities in Scotland took any action of this type, they would need to be satisfied about the scope of the existing legislative powers in Scotland.

Question 30: Should the Scottish Executive consider action in relation to the size of bins for residual waste provided by local authorities and/or the frequency of collection by local authorities? Is so, what action should be taken? Potential options include:

- ***Primary legislation on bin sizes and frequency of collection. However, this would take a number of years to be enacted. It also might mean a high degree of central control on an issue where there are bound to be local variations (e.g. type of housing stock; nature of recycling services provided).***

- *Advice on size of residual bins and frequency of collections* It might be possible to provide such advice during the work on best practice in recycling which the Executive plans to carry out with authorities over the next year.
- *Making funding streams, such as the Strategic Waste Fund and Grant Aided Expenditure for refuse services, relate directly to size of bins and frequency of collections.*

We believe it would be worth investigating mandatory recycling as part of a wider responsibility given to local authorities to tackle waste arisings.

We would also support work to tackle the size and frequency of rubbish collection. We would welcome efforts which ensured that either a package of waste prevention measures or commitment to a target to reduce waste volumes was a pre-requisite for receipt of funding streams available through the Strategic Waste Fund or Grant Aided Expenditure.

Question 34: Do consultees consider that it would be helpful to consider further the issues about “direct variable charging”? The next step would be to issue a full consultation paper on this subject, outlining the arguments for and against and the financial implications.

This is an important area that should be considered and a full consultation would be welcome. Charging for non-recycled waste once good quality doorstep collection facilities have been provided should be investigated. As noted in a report by the Policy Studies Institute¹ the Strategy Unit has previously suggested that local authorities should be allowed to implement charging schemes. In North America variable charging schemes reduced waste disposal volumes by 15-45% without causing additional fly tipping.

Question 35: Do consultees consider the Scottish Executive should carry out further work on incentives? If so, what? One option would be trials of incentives with a number of authorities.

Incentives for more sustainable behaviour/responses is useful. It can help address the issue that sustainable behaviour is often associated with hassle, inconvenience or greater cost and we would support incentive scheme trials. One possibility worth exploring is that of council tax rebates.

Question 36: Do consultees consider that waste management contracts/service level agreements should include incentives for waste prevention? If yes, how is this best achieved? Do consultees consider that waste management contracts/service level agreements can currently include perverse incentives to increase the generation of waste? If yes, what can be done to tackle this?

This is an important area where progress could be made to improve waste prevention, we have concerns that contracts awarded, for example for EfW or incineration facilities, risk tying in local authorities to providing a certain volume of waste and this perversely can act as an incentive for waste generation.

¹ A Green Living Initiative – Engaging households to achieve environmental goals, Policy Studies Institute 2006

Question 37: Do you consider that contracts (other than waste management) let by local authorities have scope for provisions on waste prevention? If so, which ones? There is clear scope to minimise waste in construction, although this may not impact on household waste. The best time to make adjustments to contracts may be when they are due to be renewed/re-let.

Procurement is an important driver to achieve change and contracts, for example for school food, should specify requirements which prevent waste

Question 38: Should the Scottish Executive take action to ensure local authorities do more on waste prevention? If so, what?

Question 39: Should the Scottish Executive lay down targets on local authorities in relation to waste prevention? If so, what should these targets require and how would this be measured?

Local authorities already have targets for recycling and similar targets aimed at reducing waste volumes would be useful in ensuring that the commitment made in the National Waste Plan to stabilise waste volumes at 2010 could be met. These targets would need to be accompanied by resources and support at a national level to enable local authorities to deliver them.

The targets should be set at a level which ensures that Scotland's increasing trend in waste arisings is arrested as soon as possible and at latest by 2010 given the commitment made to this in the National Waste Plan. The targets then need to drive waste arisings down year on year in line with the need to reduce Scotland's resource use by 75% over time.

It would also be useful if local authorities had a resource use or total material requirement target.

Question 41: Do consultees have any comments on the allocation of Strategic Waste Fund resources to waste prevention work?

As a result of the commitment and investment made through the National Waste Plan and Strategic Waste Fund Scotland's recycling record has dramatically improved in the last 5 years, increasing from 6.9% in 2001 to 25% in 2006. This is a clear demonstration of the public support for behaviour change when Government facilitates such change to occur. Whilst maintaining this momentum in improving Scotland's recycling record the Strategic Waste Fund should also be targeted at facilitating and delivering a similar scale of change in reducing waste arisings and improving waste prevention.

In addition any allocation of the Strategic Waste Fund to local authorities should be subject to a commitment and plan on waste prevention which will ensure the 2010 stabilisation target is met and beyond that waste volumes would decline. In the absence of such commitment from local authorities allocation of further funds for example through the development of the Strategic Outline Cases should not proceed.

Question 42: *Are consultees aware of any other action which could be undertaken to prevent waste? If so, what?*

Planning guidance could require much more tailored provision of recycling/composting facilities in homes and developments.

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RESPONDENT INFORMATION FORM: PREVENTING HOUSEHOLD WASTE IN SCOTLAND

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

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1. Are you responding: (please tick one box)
 - (a) as an individual Please answer Questions 2a, 2b and 4
 - (b) on behalf of a group/organisation Please answer Questions 3 and 4

INDIVIDUALS

2a. Do you agree to your response being made available to the public (in the Scottish Executive library and/or on the Scottish Executive website)?

Yes (go to 2b below)

No, not at all We will treat your response as confidential.

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available.

Yes, make my response available, but not my name or address.

Yes, make my response and name available, but not my address.

ON BEHALF OF GROUPS OR ORGANISATIONS:

3 The name and address of your organisation will be made available to the public (in the Scottish Executive library and/or on the Scottish Executive website). Are you also content for your response to be made available?

Yes

No We will treat your response as confidential.

SHARING RESPONSES/FUTURE ENGAGEMENT

4 We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

Yes

No