Evidence to ECCLR on the Climate Change Plan update

by Scottish Environment LINK's Circular Economy Project

January 2021

Introduction

Scottish Environment LINK's Circular Economy project welcomes the opportunity to give evidence to ECCLR on Scotland's Climate Change plan update. Please note this response focuses solely on the circular economy. LINK members working on other aspects of the Plan will be represented by SCCS.

What is your assessment of the progress to date in cutting emissions within the sector/sectors of interest and the implementation of the proposals and policies set out in previous Climate Change Plans (RPP1-3)?

The figures show that the Waste sector has reduced its emissions by more than 70% since 1990. However, it should be noted that emissions from the burning of waste in 'energy from waste' plants are attributed to the energy sector. As such, there has been a transfer of emissions rather than a net reduction for a portion of the waste emissions reduction.

Do you think the scale of reductions proposed within the sector(s) are appropriate and are the proposals and policies within the CCPu effective for meeting the annual emissions targets and contributing towards the 75% reduction in GHG emissions by 2030 and net-zero by 2045 targets?

The projections show the sector meeting the 75% reduction target for 2030. Policies and proposals and associated reductions are set out to 2025, but beyond that the model output shows no reductions from 2026 suggesting that greater reductions could be achieved by Circular Economy policies between 2025 and 2032. (Note there is a discrepancy between the figures in the TIMES model output on page 253 compared to the description in the text on page 155).

We urge the Scottish Government to develop an approach to managing residual waste that, whilst meeting the ban on biodegradable municipal waste to landfill, avoids lock in to additional incineration capacity, superfluous in a more circular economy. Alternative more flexible approaches based on mechanical recovery and biological treatment should be explored with relevant stakeholders.

Whilst welcome, we question whether the £70 million investment in local recycling infrastructure is adequate.

Do you think the timescales over which the proposals and policies are expected to take effect are appropriate?

Yes, the short-term policies described should be deliverable in the described time period. As already noted, there is a lack of proposals or policies beyond 2025 in the route map to 2032.

To what extent do you think the proposals and policies reflect considerations about behaviour change and opportunities to secure wider benefits (e.g. environmental, financial and health) from specific interventions in particular sectors?

In general, to maximise economic, environmental and social benefits, the Plan needs to be more 'joined up' with the circular economy better embedded in particular sectors. A more circular economy offers additional environmental benefits through carbon footprint reduction and reduced impact on biodiversity, and socio - economic benefits through enhanced resilience and opportunities for jobs. The importance of moving to a more circular economy is recognised in the Climate Change Plan - as a cross cutting issue *(the circular economy is) 'relevant across all sectors of the Climate Change Plan update and in wider public procurement' (pg 66)* and as central to the Green Recovery - '*we will embed circular economy principles into our wider green recovery, prioritising areas with the biggest opportunities: construction; agriculture/food and drink; energy and renewables; procurement; skills and education; and plastics'* (pg 157). However, there is a lack of follow-through in the sector chapters. More join-up would enhance the Plan and ensure that the different sectors support each other.

There is scope in both the chapters on electricity and buildings to include consideration of materials and approaches, such that carbon emissions are minimised both upstream and down-stream. For example, the building sector policies solely focus on energy efficiency and low carbon heating of buildings – minimising the emissions from the use-phase of buildings. These policies will drive programmes to insulate and supply low carbon heating to huge numbers of buildings, creating demand for materials and products. The nature of those materials and products and how they are integrated into existing buildings and infrastructure will have carbon impacts before they are installed and at the end of their life, mainly in terms of the carbon embodied in them during processing and manufacture, carbon associated with transporting them and carbon associated with them as waste. If a whole carbon life-cycle approach was taken to insulating homes, it would ensure that overall carbon benefits are maximised through the best choice of approaches and materials. As such, a circular economy approach to the building sector can support reduced emissions from the energy, transport and waste sectors through creating demand for circular approaches and products.

Although 'energy and renewables' are identified as a priority area for circular economy in the green recovery, there is no indication of this in the electricity chapter and the points made above with regard to buildings can also be applied to energy.

In the Industry chapter, there are welcome statements on supporting enterprises who are developing low carbon products and looking at ways to increase demand for such products, but there is a lack of detail on this.

In general, there are virtually no policies on resources or low carbon materials, the exception being the increase in supply of sustainable timber. It would be useful if the Plan included proposals of how considerations of resources and materials are to be taken forward in climate change policy in each sector.

With regard to the chapter on Waste and the Circular Economy, we welcome the measures described, but would like to see the addition of:

- A commitment to a Circular Economy Bill which will set a framework for reduced material and carbon footprints to be in line with One Planet Prosperity;
- A commitment to publish annual material flow accounts, to inform circular economy policy;
- A commitment to additional action higher up the waste hierarchy on product design, product standards and right to repair, required under the EU Circular Economy Action Plan.

To what extent do you think the CCPu delivers a green recovery?

This is very hard to comment on given there is no indication of numbers of jobs created or benefits other than territorial GHG emission reduction.

Contact:

Phoebe Cochrane phoebe@scotlink.org