LINK Consultation Response

August 2022

Delivering Scotland's circular economy – route map to 2025 and beyond: Consultation response

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Economics Group and is supported by the members listed at the end of the response. Individual LINK members are also submitting responses, which will contain additional detail in specific areas.

Summary of key points

LINK members welcome the Scottish Government consultations on a circular economy bill and route map subject to our detailed responses. We welcome the acknowledgement in the consultation documents of the impact that our over consumption of raw materials is having on climate and nature and that this is urgent. We also welcome the suggestion that Scottish Government is willing to use all levers available to steer our economy to one that is more circular, and would urge you to follow through on this; noting the positive precedent of the exclusion to the UK Internal Market Act (2020) in the banning of single use plastic items. Summary of key points:

- **Circular economy targets and strategy**. LINK members are pleased to see consumption based targets and a 5 yearly strategy proposed. We would like to see more ambition with the CE Bill introducing statutory targets to reduce Scotland's material footprint to 8 tonnes per person per year by 2045 and Scotland's carbon footprint to zero by 2045. The proposed CE Strategy must set out the policies and proposals by which Scottish Ministers intend the consumption-related targets to be met. Ministers should also be required to report regularly on the implementation of the strategy and progress towards the targets.
- **A duty on public bodies**. The Bill must include a duty on public bodies to act in such a way as to contribute to the new CE targets.
- **Procurement.** There needs to be a more robust approach to the role that procurement plays, ensuring that it is the norm for public spending to align with CE principles. This may require changes to procurement legislation.

- **Soils and primary production**. Renewable materials and the food we eat need to be produced in a circular way, which means attention to soils and the inputs to food and fibre production. A commitment to restoring and looking after our soils and a Soils Plan must be included in the Circular Economy bill.
- **Embedding re-use**. The proposals are lacking in how to embed re-use and encourage repair. We make several suggestions for incentivising repair and mainstreaming re-use.
- **Harmful materials and substances.** Upstream measures are required to tackle the leakage of micro-plastics and harmful chemicals into the environment. The proposals should provide pathways to addressing these problems.
- **Urgency**. Although, we want to see policy based on science, this needs to be balanced with the urgency of climate change and biodiversity loss; and we would therefore ask the Scottish Government to introduce more ambitious time frames where possible.

Circular economy route map consultation questions

Question 1. To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use?

Strongly agree

This package is directed at the upper parts of the waste hierarchy and is therefore very important. Addressing consumption is key to ensuring climate and biodiversity impacts are reduced. Scotland's material flow accounts show our consumption of materials to be more than double sustainable levels[1] and about 80% of our carbon footprint is associated with the products we use and consume[2].

We support the measures put forward in this package of the draft Route Map but would like to see additional ambition.

Question 2. **Are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and re-use?**

Charges and bans
LINK members see the banning of environmentally harmful products / materials combined with Producer Responsibility measures and active encouragement for re-use and sharing as key to the systemic change that is needed.

The proposals include a prioritised approach to charges and bans on environmentally damaging products from 2025. LINK members urge the Scottish Government to define 'environmentally damaging' as all products and materials that can not be safely reused or recycled, and all single-use products. Scottish Government should allow only essential single-use products to be manufactured and sold in Scotland. For other products and materials, only those that can be safely reused or recycled should be allowed.

Additionally, when considering which products to address with bans / charges, Government must consider the effect on consumer behaviour and likely substitution. Often parallel policies will be needed to make sure the net effect of the policy is a reduction in overall material consumption and consumption related environmental

[1] https://www.zerowastescotland.org.uk/research-evaluation/material-flow-accounts-mfa#:~:text=The%20Material%20Flow%20Accounts%20report,in%20the%20climate%20crisis%20debate.
[2] https://www.gov.scot/publications/scotlands-carbon-footprint-1998-2018/

impacts. As a general principle, charges and bans should be applied to groups of products and not on a product by product basis which is too slow, inefficient and encourages substitution.

Bans are most likely to be effective if

1. They are focused on environmentally damaging items
2. All environmentally damaging items for a particular function are covered by the ban (in particular, single use alternatives)
3. Lower impact alternatives exist (such as reusable options)

LINK members feel that certain charges and bans should be applied as soon as possible:

Charges

A charge on single-use cups and single-use take-away food packaging. The proposals for a charge on single use cups should have a more ambitious time frame and should be extended to single-use food containers at the same time, as is in place in Estonia and coming into force in Spain[3]. The charge on cups was recommended by the Expert Panel in 2019 and discussed at length at that time. To wait until 2025, seems to be unambitious.

A charge on all single-use bags, however small, not covered by the current plastic bag charge should be introduced as soon as possible. Although there has been a small increase in retailers offering unpackaged food, especially fruit and vegetables, observations suggest that many people use the small bags available when choosing loose items, instead of bringing reusable bags or taking the items loose. If all bags had a small visible charge, it would encourage consumers to bring reusable alternatives (as for the larger bags). Without this measure, there is a danger that the benefits of reduced packaging will, in part, be negated if consumers are effectively using a different single-use system.

Bans

In terms of banning specific products: LINK members propose that, as a first step, the following are banned:

- Single-use crockery, cutlery and sachets should be banned from 'closed settings' – i.e. where people consume the food and drink in a defined area. This would include sit-in cafes / canteens etc, including those that have outside seating; stadiums, festivals, airports. In such settings the use of reusable crockery / cutlery is entirely feasible.
- Single use wet-wipes that contain plastic and single use plastic tampon applicators.
- Single use plastic cigarette filters and disposable vapes.
- Microplastic infill for artificial pitches[4].

In terms of other potential priorities that require research:

- In France, plastic food packaging is banned for about 30 types of fruit and vegetables[5]. Scottish Government should quickly ascertain for which food items plastic, or other, packaging should be banned; based on a life cycle analysis that takes food waste into consideration.

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[3] https://rethinkplasticalliance.eu/wp-content/uploads/2021/06/SUP-Assessment-Design-final.pdf

[4] Artificial sports pitches have been hailed as a way to divert used road tyres from landfill, however, this rubber crumb can easily escape from pitches and has become a significant source of microplastic in the environment. Artificial pitches maybe on the fastest growing sources of microplastic due the predicted growth of the industry. Scotland has already made a commitment under OSPAR to reduce microplastic contamination from artificial grass, however, to fully address this waste source, legislation in Scotland is needed to ban the use of microplastic in artificial grass and pitches. The response by Fidra has further information.

[5] https://www.bbc.co.uk/news/world-europe-59843697

- Sulphur hexafluoride (SF6) which is used in medium voltage operations[6] and is a highly potent greenhouse gas for which alternatives exist. It is currently used in windfarms and its use is therefore set to increase markedly.

As mentioned above, parallel interventions might well be needed to encourage consumers to switch to reusable alternatives. Take-aways and providers of on-the-go food should be required to offer to serve their food or beverage in reusable containers – this is the law in Germany. Deposit return schemes for cups and food packaging should be promoted and rolled out both for settings such as conferences, festivals, airports; but also on city / region wide basis. Government must have a role in ensuring compatibility between schemes if there are multiple providers.

In addition, any new product coming onto the market needs to demonstrate that it is 'circular economy compatible' – ie repairable, reusable, recyclable. We can not be in the situation where we are banning harmful items / materials whilst allowing others onto the market. For example, we have seen single use compostable food packaging replacing single use plastic food packaging but the compostable packaging contains large amounts of PFAS (the forever chemical) which has harmful environmental and health consequences. Using the powers to set resource efficiency standards from the Environment Act[7] could effectively ban such products.

EPR and product stewardship

The draft Route Map includes the proposal to 'to publish a prioritised approach to product stewardship'. Ultimately, we need EPR across the economy, such that producers and retailers are responsible for the life-cycle impact of their products. Although it is logical for EPR to be implemented with other UK nations, as has and is being done for some product groups; Scottish Government does have the powers to implement EPR measures and should use them.

We are concerned that the proposals to 'develop at least three priority products for further action' could result in insufficient action in this area. As well as specific schemes for product groups, there must be an overall move towards producer responsibility being the norm.

A relatively simple but effective EPR measure is to require companies to take back used items. Some retailers such as IKEA and H&M already offer to take back used items. This best practice should be built on – LINK members call for all furniture and clothes retailers to be required to take back used items. This could be extended to other product groups such as electrical items, or across the board. It would help mainstream re-use and encourage retailers to think about how they can re-use their products or materials instead of relying on new raw materials and, ultimately, feed through to design, such that products are both made from secondary materials and designed to retain value. Lessons should be learnt from initiatives in Japan[8]. A ban on the destruction of reusable goods should accompany this measure (please see our response to the CE bill proposals consultation).

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[6] SF6 is used in the electrical industry as an insulating material used widely across the industry from large power stations to wind turbines. It is a cheap, non-flammable synthetic gas. It also has the highest global warming potential of any known substance (23,500 GWP100[6]). SF6 is increasingly being used in offshore wind turbines despite less environmentally damaging alternatives being available. Atmospheric concentrations of SF6 have almost doubled over the last 20 years. The most common form of release is through leaks in electricity industry infrastructure. The EU is reviewing the use of SF6 next year. The response by Friends of the Earth Scotland has further information.

[7] https://www.legislation.gov.uk/ukpga/2021/30/part/3/enacted https://www.legislation.gov.uk/ukpga/2021/30/schedule/7/enacted covers design relating to longevity, repairability, how it can be disposed, materials it is made from, resources used during production or use

[8] https://www.the-ies.org/analysis/circular-economy-japan

Government needs to use powers from the Environment Act on resource efficiency standards and labelling. LINK members would like to see clear labelling of all products in terms of lifespan, recycled content, repairability and recyclability. Clear labelling of chemicals is also necessary to inform recyclability to help avoid the situation whereby chemicals banned in the future but in use now remain in circulation, but we don't know which products they are in. We currently face this with DECCAB in mattresses.

Repair
LINK members would like to see a repair incentive voucher scheme as in Austria to encourage people to get things repaired. We would also urge the Scottish Government to put pressure on the UK Government to reduce VAT rates for repair, as is the case in Sweden where VAT is reduced by 50%. Additionally, the Scottish Government should offer reduced rates to businesses offering repair services.

Consumption reduction targets
The package includes the proposal for legislation to take powers to set consumption reduction targets. LINK members strongly support the setting of consumption targets, due to the environmental impacts directly relating to our consumption of materials; and would like to see carbon and material footprint targets included. We need to reduce our consumption of materials in general, and particularly those that are harmful and contribute to climate change. We make a further comment on the principles that should underpin targets in Q 15 of this consultation.

Business models
We would also like to comment on the proposal: '*To identify way to expand business models that prolong product lifespan by 2025*'. We urge Scottish Government to develop initiatives or systems that are nationwide and act across the economy, as opposed to isolated actions. Public procurement can play a big part – we comment on the need to strengthen procurement requirements later in this consultation.

Re-use
To prioritise and mainstream re-use is one of the aims of the Package; but proposals to do this are limited. It is important that re-use is embedded and efforts are made to promote both the supply and demand for reuse. We do not want the situation where re-use is a side show with the main economy continuing to operate as before. As well as increase in re-use, there needs to be a parallel reduction in consumption of new products for us to meet consumption reduction targets. Main retailers should be encouraged to offer used items, as is done by retailers such as IKEA, but also many other smaller outlets. This will be encouraged by an obligation to take products back and reduced business rates, as outlined above.

Question 3. To what extent do you agree with the measures proposed in this package to reduce food waste?

Agree

Question 4. **Are there any further measures that you would like to see included in the Route Map to reduce food waste?**

The measures are welcome, but neither strong enough nor comprehensive enough.

LINK members would like to see the mandatory reporting on food surplus and waste for businesses apply to catering outlets as well as food retailers and should also apply to their supply chains (see our response to the Bill proposals consultation).

Fresh thinking and ministerial focus is urgently needed if Scotland is to meet the SDG target of halving food waste by 2030. One starting point could be a food waste hack which brings together a very diverse range of perspectives to generate new ways of thinking about food waste. This group could also draw on policies from other countries, such as in France, Denmark, Norway and Japan[9].

There needs to be a new and imaginative approach to awareness raising including the sharing of best practice. Awareness raising campaigns need to be properly resourced and sustained. Learning from projects funded under the Climate Challenge Fund would be valuable in informing future support. Likewise, lessons should be learnt from local food initiatives that emerged in response to the COVID 19 pandemic. Local authorities are well placed to lead on coordinating food initiatives that focus on locally produced food, minimising waste and healthy food, but they need to be resourced to do this. A forum that would share best practice should be established.

Looking beyond food waste, the Route Map should look at primary production and how we produce food and this should be covered in a Sector Plan for food and farming (including aquaculture and fisheries).

A co-developed protein strategy, to make use of waste and by-products and ensure protein is produced sustainably, should be part of the Sector Plan. Aspects of our protein production, especially intensively raised chicken, pigs and farmed fish are inherently uncircular, relying on grains, soya and wild fish based feeds; with significant land use implications and environmental impact[10]. A protein strategy should set out how we produce protein, using low opportunity cost' livestock feed (feeding animals with by-products from the food, fisheries, aquaculture and agriculture sectors and using marginal grassland); as well as producing novel proteins such as insects and algae from waste and byproducts.

Other inputs to our food production system, such as synthetic fertilzers, are also incompatible with a circular economy. Pesticide use in its current form is uncircular and unsustainable. We need effective integrated Pest Management which measurably reduces pesticide use and harm. IPM need to be promoted and good practice shared. There needs to be greater use of natural manures and nitrogen-fixing cover crops instead of synthetic fertilisers.

All support and payments to 'farmers' should be conditional on regenerative and circular practice and there needs to be read across between the CE Strategy and forth coming Agriculture bill.

The Scottish Government states it has a vision to be a world leader in regenerative agriculture[11] which has soil health at its very heart. Soils are part of a circular system and are fundamental to our ability to produce food and renewable resources such as timber. The production, consumption and export of food is also a hugely important part of Scotland's economy.

There are a myriad of pressures on Scotland's soils, as identified by the Scottish Environmental Protection Agency's position statement on planning and soils[12], yet there is no overarching piece of legislation in place which provides protection for all soils from all threats. Soils are a renewable resource that needs careful stewardship and management, underpinned by a regulatory framework. The Route Map should include measures to take care of our soils to ensure they are regenerated, not polluted and not eroded. We need a National Soil Plan which reports on a 5-year cycle on the state of Scotland's soils and monitors soil loss/health,

[9] https://www.globalcitizen.org/en/content/food-waste-sustainability-agriculture-ranking/#:~:text=Because%20of%20its%20strict%20zero,Center%20for%20Food%20%26%20Nutrition%20Foundation. https://foodhero.com/blogs/countries-fighting-food-waste

[10] https://www.wwf.org.uk/learn/low-opportunity-cost-feed

[11] https://www.gov.scot/publications/next-step-delivering-vision-scotland-leader-sustainable-regenerative-farming/

[12] https://www.sepa.org.uk/media/138611/position-statement-on-planning-and-soils.pdf

with ambitious targets to increase soil carbon. There needs to be a commitment to nutrient budgets including a phosphorus balance sheet, and there needs to be a Chief Soils Officer in Government. There needs to be a duty on land managers to maintain and enhance soil carbon levels and prevent soil erosion. Lastly, there needs to be a specific and sizeable levy paid on any activity which seals soil, therefore destroying its regenerative capacity, which can be used for remediation of soil and peatland; and any soil sealing activity, such as paving or artificial grass, needs to require planning permission.

Question 5. To what extent do you agree with the measures proposed in this package to improve recycling from households?

Strongly agree

We welcome the comprehensive measures put forward, complemented by the proposals for the CE bill. LINK members want a recycling system such that everyone has access to easily identifiable recycling facilities, there is consistency in collections across Scotland, packaging and products are clearly labelled as to whether they are suitable for recycling, and there is a sustained public awareness campaign. This requires significant investment and lessons can be learnt from Wales and elsewhere[13].

LINK members are heartened by the point in the draft Route Map about embedding recyclability in design and sale of products and would urge Scottish Government to use all levers to maximise this. LINK members have responded to DEFRA consultations on EPR, pressing the point that modulation of fees needs to be sufficient to drive eco-design. LINK members would urge Scottish Government to introduce Resource Efficiency requirements[14] to ensure the recyclability of products not covered by EPR measures, or where EPR measures are insufficient.

LINK members support the review of waste and recycling service charging. Experience from elsewhere suggests it has a role in incentivising reductions in residual waste. Incentives or charges should not be introduced until a comprehensive recycling infrastructure and collection is in place and products are clearly labelled in terms of whether they are suitable for recycling. Current costs of waste collection are hidden in council taxes, so any new charge needs to see a corresponding decrease in council tax such that the cost to the household remains the same, with the cost of waste collection becoming visible rather than additional. Only if households need 'extra' weight / volume should the new incentive result in a net increase in cost to the household. Implementing such a system is likely to be complicated and learning from best practice in comparable geographies/ housing types will be key.

Question 6. Are there any further measures that you would like to see included in the Route Map to improve recycling from households and incentivise positive behaviours?

Proposal 1 in this package is to '*co-design high quality, high performing household recycling and reuse services by the end of 2023 …..*' yet there is no further detail on the re-use aspect. LINK members want to emphasise the importance of putting reuse on a par with recycling. We have suggested some measures in Q1 that will help mainstream reuse involving retailers. There is also a role for local authorities in ensuring there is a comprehensive service to support re-use through collecting reusable items from households, providing reuse

[13] https://www.statista.com/statistics/1219551/municipal-waste-recycling-eu-by-country/ shows Germany to be the leader.

[14] Powers under the UK Environment Act and covers design for longevity, repairability, recyclability, materials used etc https://www.legislation.gov.uk/ukpga/2021/30/schedule/7/enacted

hubs at community recycling centres, partnering with social enterprises, and being active partners in initiatives that make reused items available[15].

Local authorities themselves have a huge role in leading the way and there is an urgent need to improve recycling and reuse across the Local Authority estate. Schools are vital, and anecdotal evidence suggests a huge variation in recycling / reuse cultures across the school estate. Embedding recycling behaviour in our young people must be a priority. Local authorities must think holistically and work across departments to increase reuse and recycling and reduce residual waste. For example, putting conditions on licences to operate pop-up cafes / markets / festivals to reduce waste, such as requiring reusable deposit cup / food container systems and insisting on recycling collection.

Question 7. To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses?

Agree

LINK members agree with proposals 1 – 3. Although LINK members support measures to reduce environmental pollution from commercial waste collection, we are aware of concerns about effects of commercial waste zoning on the resilience of the waste management sector, especially if contracts are offered to single operators and would like to make sure that this is taken into consideration.

Question 8. Are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?

Measures to improve the circularity and recycling of fishing and aquaculture gear were highlighted in the consultation earlier this year on an updated Marine Litter Strategy for Scotland which we welcomed. We also called for redundant or end of life aquaculture gear to also be included. We look forward to the new strategy being published and would recommend reference to these actions is included in the Route Map.

Marine Conservation Society's beachwatch project, as well as feedback from the Coastal Community network and Scottish Island Federation, finds there is a huge problem with discarded or lost fishing and aquaculture gear. This needs to be addressed through a robust EPR scheme that can pay for collection and re-use / recycling and ensuring that harbours have adequate facilities. There should be a consistent approach across LAs with all coastal LAs offering re-use and recycling facilities for fishing and aquaculture gear litter. Re-use should be maximised by supporting repair enterprises linked to these facilities.

LINK members would like to see comprehensive analysis of commercial and industrial waste to inform recycling services and priorities. Prioritisation should be given to the reduction of and reuse/ recycling of waste streams with the highest life-cycle carbon impacts and those that have other environmental impacts.

Question 9. To what extent do you agree with the measures proposed in this package to embed circular construction practices?

Agree

The measures are welcome, but not strong enough. LINK members ask for mandatory best practice standards and targets for the sector.

[15] Examples of initiatives include https://reuse360.org.uk/ , https://www.letsrecycle.com/news/three-reuse-shops-open-in-greater-manchester/

Question 10. Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?

LINK members think that Scottish Government should set mandatory standards, targets and requirements for the construction sector, rather than relying on voluntary approaches. As an aside, a general principle for all sectors should be if 'best practice standards' are needed to meet carbon and nature targets, those standards must be compulsory, not voluntary.

We would also recommend looking at best practice elsewhere and adopting policies used in urban development in Amsterdam in the Netherlands[16]. From 2022 all urban development and design will use circular economy criteria including incorporating bio-mimicry and recycled materials. Collaboration and innovation are fostered in the system. The plan also includes an ambition for 50% of building maintenance and renovations to follow circular construction principles by 2025. In France, all public buildings have to be built from at least 50% timber or other natural materials[17]. In Scotland, Section 82 from the Climate Change Act could be used for buildings, to require recycled content.

We understand that awareness about the 'circular economy' is low amongst SMEs in the construction sector. There needs to be mandatory training and accreditation.

The design phase is the most important juncture at which to include circular principles and solutions. Planning consent should be conditional on collaboration between the client, main contractor and supply chain partners to reduce the material and carbon footprints of the project and other environmental impacts from its whole life cycle. Design for deconstruction should be mandated through Building Standards as recommended by the Climate Assembly.

Scottish Government should press UK Government to introduce a reduction in VAT on refurbishment[18]. Scottish Government should support the development and promotion of a standardised format for material passports in Scotland and require the use of material passports[19] in new buildings.

Pre-demolition and pre-refurbishment audits[20] must be required for projects above a certain size. These should include a clear demarcation of where unused materials from the site are going, to ensure better traceability of resources.

Public sector must show leadership through the introduction of a mandatory requirement (eg a Built Environment Circularity Commitment) that publicly funded construction projects must meet the Net-Zero Carbon in Public Sector Buildings (NZCPSB) Standard and a) be assessed on total life cycle costs and carbon; b) look to retrofit solutions first and c) procure circular products (reused, designed for disassembly, recyclable).

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[16] For more details, see Friends of the Earth Scotland (2022) Circular Economy in Action around the world and https://knowledge-hub.circle-lab.com/article/7580?n=Amsterdam-Circular-Strategy-2020-2025

[17] https://archinect.com/news/article/150183480/france-requires-new-public-buildings-to-contain-at-least-50-wood

[18] https://www.architectsjournal.co.uk/news/vat-chance-can-tax-reforms-spur-a-retrofit-renaissance

[19] for example using Building Information Modelling (BIM) https://ukbimframework.org/en/ , to improve productivity and reduce waste. BIM is a collaborative way of working underpinned by digital technology. Passports detail the materials used and how materials and components can be recovered and this information is passed on to subsequent owners / managers of buildings. Currently BIM is required of large projects, but not widely used across the industry

[20] https://www.designingbuildings.co.uk/wiki/Pre-demolition_audit Austria has introduced the Recycled Construction Materials Regulation. The regulation sets an obligation to carry out a pre-demolition audit for potentially reusable or hazardous construction components and selective demolition requirements.

Question 11. To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?

Agree

Question 12. Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?

There are considerable quantities of recyclable materials in residual waste. Some waste facilities already pre-sort residual waste prior to disposal to remove valuable material. LINK members suggest that this best practice should become mandatory.

In Scotland, only a fraction of fishing gear is collected for recycling and gets recycled (albeit not in the UK), most ends up in landfill. Research by Plastic@Bay[21] on end-of-life fishing gear types and management in harbours of the Highlands in Scotland showed that all harbours sent their end-of-life gear to landfill, simply because there is no other option. Their research showed that west coast harbours dispose of between 20 – 50 tonnes of EOL fishing gear annually[22]. We supported measures outlined in the consultation for the updated Marine Litter Strategy for Scotland and would again recommend cross referencing work with the Circular Economy Route Map to ensure join up. This includes creating and improving access to local recycling opportunities to reduce the impact of the high tonnage of waste currently going to landfill from Scotland's fishing sector.

Question 13. To what extent do you agree with the measures proposed in this package to support action across the circular economy?

- Introduce duty to develop a Circular Economy Strategy.
- Develop a monitoring and indicator framework.
- Undertake a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities.
- Develop public procurement opportunities to reduce the environmental impact of public spending.
- Support greater uptake of green skills, training, and development opportunities.

agree

LINK members would like to see stronger measures on procurement – Scottish Government needs to do more than develop public procurement **opportunities** to reduce the environmental impact of public spending. We need measures to ensure that the norm is for public spending to align with the principles of a circular economy. This needs a wholesale shift in procurement across the whole public estate and should include:

- A mandate to ensure that Green Public Procurement Guidelines are being followed.
- A requirement to report on 'circular spending': service hire or product sharing, repairing of existing products, or purchasing second-hand / refurbished, rather than purchasing new products.
- A requirement to demonstrate a year on year increase in circular spending as a proportion of overall spend.
- A requirement on suppliers to report on material and carbon footprints.
- A requirement to demonstrate a reduction in public procurement footprints per £ spent.

The proposals include the option of looking at where S82 might be used to require levels of recycled content in procurement. LINK members would like a clear commitment to investigate and report on this by end of 2023.

[21] https://bit.ly/3u8ttvE

[22] https://www.plasticatbay.org/2021/09/30/what-happens-to-end-of-life-fishing-gear-in-nw-highlands/?v=79cba1185463

Question 14. Are there any further measures that you would like to see included in the Route Map to support action across the circular economy?

There needs to be a sustained general awareness raising campaign to increase understanding of what a circular economy is, why we need one and how everyone can get involved.

Sector level plans, including farming, fishing and aquaculture, should be included as part of the proposed Strategy. The Plans should detail how each sector will contribute to CE targets, including material and carbon footprint targets, and, together, provide a comprehensive pathway to achieving interim and long-term targets. Plans should include outcomes, milestones and aligned budget resource and be revised every 5 years. Sector Plans must look at supply chains and inputs to the sectors as well as making best use of the products/materials and reducing waste. A protein strategy and its implementation has an important function in reducing our environmental footprints and needs to be linked to a Sector Plan for farming, fishing and aquaculture.

There also needs to be a commitment to following the principles and practices of Just Transition. Many sectors will change and it is essential that provision is made for people working in those sectors. For example, the likely impacts on employment should be assessed and where a more circular economy requires changes in employment patterns, the affected workers should have a clear offer of support, skills training and, where necessary, alternative employment. Further, it is often the case that workers have the insight and experience to give valuable guidance to new practices and approaches which should be sought and used. Sector level circular economy planning should align with Just Transition Plans.

LINK members would also like to see an action on chemicals which is relevant across the circular economy. Overall, it is necessary to improve transparency and traceability of harmful chemicals to ensure products are safe by design[23]. For example, in some instances, chemicals intended for one purpose such as flame retardants in electronic equipment, have been recycled into other consumer products such as kitchen utensils or children's toys where they serve no purpose and are a risk to health and/or the environment. These considerations need to be included to ensure that a circular economy is safe and sustainable. To inform appropriate use, reuse, recycling and end of life disposal of products, a full materials disclosure should be mandatory for all products, providing transparent and accessible data on chemicals to users from across the supply chain[24].

The leakage of contaminants, especially micro-plastics and harmful chemicals, into treated sludge or biosolids, which are then spread on land, is also problematic. This needs to be addressed through better product design, mandating washing machine filters and improved monitoring.

LINK members would also like to see the Route Map address waste exports with a commitment to reduce these over time. Exporting waste to countries with a lower infrastructure than Scotland to handle waste should be phased out completely. It is unethical and undermines public trust in recycling. We need clearer reporting on shipments of waste and destinations. Scottish Government should also exert pressure on UK Government to follow through on its commitment to ban the export of plastic waste to non OECD countries[25].

The transition to a more circular economy needs to be a whole government endeavour. It is good to see read across to the Environment Strategy, Biodiversity Strategy and Climate Change Plan mentioned; but we crucially need better alignment of the Economic Strategy with circular economy principles and, as such, would like to see read across to the Economic Strategy Delivery Plans in the CE route map.

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[23] http://changingmarkets.org/wp-content/uploads/2018/10/SMALL-changing-markets-layout-EN.pdf
[24] https://www.fidra.org.uk/wp-content/uploads/Fidra-Statement-on-Chemicals-in-Circular-Economy.pdf
[25] https://deframedia.blog.gov.uk/2021/01/22/defra-responds-to-coverage-on-plastic-waste-exports/

Question 15. To what extent do you agree with the principles proposed to underpin future circular economy targets?

Agree

Principle 1: Achieve net zero by 2045 – future targets should align with net zero consumption emissions, rather than territorial emissions which don't take account of emissions from the goods we import from other countries.

Principle 2: Reduce the material footprint of our resources and waste – **agree**

Principle 3: Maximise the value of our circular economy – if value is taken in the wider sense, to include the true social value, then we agree with this principle. We caution against being driven by market value.

Principle 4: Align with the EU - **agree**

We suggest a 5th Principle: Achieve nature positive by 2030. Some damaging aspects of our linear economy, especially the leakage of harmful materials, impact biodiversity and would not necessarily be covered by the other principles.

This response was compiled on behalf of LINK Economics Groups and is supported by:
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