



Scottish
Environment
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Dear Ms Slater, Minister for Green Skills, Circular Economy and Biodiversity,

Follow up letter to LINK CE meeting, 9th Feb 2023

Thank you for meeting with LINK last week to discuss circular economy – progress and challenges.

I would like to take this opportunity to reiterate some of the main points made during the meeting and follow up on some of the issues raised.

It was good to hear of the support for CE measures from MSPs and of the progress under the SUP directive with a range of evidence gathered on food containers, period and incontinence products, sachets, food and veg wrapping and cigarette filters. You explained that Zero Waste Scotland are commissioning the evidence on single use Vapes, looking at policy options in the round. We would be interested in hearing a timescale for SUP measures when available.

As mentioned, we welcome the CE bill proposals and draft route map as offering a more comprehensive approach to the CE transition; but reiterate that our key ask remains that the bill establishes the framework, through consumption reduction targets and a statutory Plan, to deliver that transition. You explained your hesitancy over consumption reduction targets due to the lack of powers to deliver a reduction in Scotland's footprints. Although we concur that Scotland is limited in what it can do; action on construction and procurement in particular; as well as EPR measures more generally, are within the Scottish Government's competency and could have a significant impact on our footprints. Scotland's Circularity Gap report <https://www.zerowastescotland.org.uk/content/circularity-gap-report-december-2022>, commissioned by ZWS, identifies measures which it estimates will deliver a 43% reduction in Scotland's material and carbon footprints. I also mentioned a forthcoming report which will demonstrate the potential material footprint reductions that can be achieved through a focus on construction. I will forward that once published. This is the report I mentioned in the meeting which highlights some of the CE policies being implemented in EU member states [draft-report-for-dg-env_final.pdf \(europa.eu\)](#) - there are some useful examples.

I mentioned our ask for mandatory reporting of scope 3 emissions as a relatively simple measure that would help steer business behaviour towards circularity. If you are interested in more detail, I can put you in contact with someone who works on this.

We stressed that the bioeconomy was largely absent from the CE Bill proposals or the draft route map and we would expect to see it addressed. We noted that the EU's Farm to Fork initiative forms part of its



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Circular Economy Strategy. We would also expect to see concrete measures on construction and procurement as priority areas for action.

We noted that there has been little progress on food waste reduction except at retail level. This should be addressed through the national and local Good Food Nation Plans - as well as for example through mandatory food waste reporting along the supply chain, requiring catering businesses to achieve minimal food waste as a licensing condition and looking at how EPR principles could encourage retailers to help their customers waste less food. Nourish offered to work with SG in thinking about approaches to food waste reduction. Please contact Pete Ritchie pete@nourishscotland.org.uk

Calum noted that the MCS beach litter survey report would be published in the Spring which might also include some useful data on fishing gear. We would like to see marine and coastal activities including aquaculture in the CE route map as the environmental impacts of lost fishing gear and various aspects of aquaculture are a concern. We welcome that you have been pressing UK Government on EPR for fishing gear.

Catherine from Fidra raised the issue of the recent requirement to incinerate used sofas, due to their high levels of PoPs, as an example of how the presence of harmful chemicals and lack of transparency in labeling are acting as a barrier to the CE. She also raised another example of harmful contaminants in Sewage Sludge which is currently applied to agricultural land in Scotland - a practice which should be laudable but really needs to end immediately if we wish to protect Scottish soils. She noted that the UK is falling behind EU REACH with far fewer chemicals listed as a concern. She urged the Scottish Government to press DEFRA on priority chemicals and noted Scotland has not put forward any individual or groups of chemicals of concern to be added to DEFRA's priority list since the UK left the EU. Catherine will follow up with further information.

We asked about integration of circular economy into other SG portfolios and noted concern at the near absence of CE from the National Strategy for Economic Transformation and its delivery plans and from the newly published draft Energy Strategy. We acknowledge that there has been more success in other areas such as NPF4 and understand that this is something that officials aspire to. It would be interesting to know if there are particular barriers and feel a review of progress in getting CE embedded into other portfolios would be useful.

We appreciate your point about capacity constraints affecting the pace at which new measures and initiatives can be brought forward and acknowledge and welcome your ambition and commitment to a more circular economy. If you have further questions or would like to follow up on any of the above points, please do get in touch.

Kind regards,



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