

## LINK Call for Views Response

Response to Net Zero, Energy and Transport Committee call for views on the Circular Economy (Scotland) Bill  
August 2023



Scottish  
Environment  
LINK

# Net Zero, Energy and Transport Committee call for views on the Circular Economy (Scotland) Bill

## Scottish Environment LINK response

August 2023

### 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. 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 Sustainable Economy Group.

### Circular economy strategy

#### **1) Is a statutory requirement needed for a circular economy strategy?**

Yes. As outlined in the Policy Memorandum, a more circular economy is pivotal to addressing climate and nature crises as well as offering economic opportunities and other social benefits. It is too important an issue to risk being derailed by short-term priorities or other obstacles to its progress. We therefore agree that a CE strategy should be a statutory requirement.

#### **2) Is there anything else you would like to say about a circular economy strategy? (Section 1 – 5)**

The Strategy must be linked to the consumption targets, once set. As such 1 (2) (a) should be changed to along the lines of: *'must set out the Scottish Ministers objectives relating to developing a circular economy, including meeting the CE consumption targets when these have been set'*

An additional point should also be added under 1 (2) along the lines of *'must include a governance structure to ensure implementation and accountability'*. We note the clear governance structure outlined in the new Litter and Flytipping Strategy and support a similar approach.

The clause in section 1 (3) *'In preparing the circular economy strategy, the Scottish Ministers must have regard to the desirability of the economy being one in which .....'* needs strengthening. 'Regard to' and 'desirability of' make it a weak duty on Ministers. Suggest wording along the lines of: *'In preparing the circular economy strategy, the Scottish Ministers must seek to achieve an economy in which ....'*



Section 1 (3) is followed by 5 features of a circular economy, (a) - (e) below, which rightly focus on reducing the consumption of materials. However, the leakage of materials, or any priority in terms of polluting materials, materials the processing of which is polluting, or unsafe materials is not covered. These points should be included in 1(3). Suggested additional points (f), (g) and (h) below:

- (a) processes for the production and distribution of things are designed so as to reduce the consumption of materials,
- (b) the delivery of services is designed so as to reduce the consumption of materials,
- (c) things are kept in use for as long as possible to reduce the consumption of materials and impacts on the environment,
- (d) the maximum value is extracted from things by the persons using them,
- (e) things are recovered or, where appropriate, regenerated at the end of their useful life,
- (f) the production, distribution and end of life management of things is carried out in such a way as to avoid the leakage of materials into the environment,
- (g) polluting and harmful materials and chemicals, and materials which the production of which causes pollution are phased out,
- (h) the content of materials including harmful chemicals, is transparent and traceable to facilitate safe repurposing and reuse of goods and materials.

Section 1 (5): *'The circular economy strategy must be prepared with a view to achieving consistency, so far as practicable, between the objectives and plans set out in the strategy and— (a) the climate change plan prepared under section 35 of the Climate Change (Scotland) Act 2009, 5 (b) the environmental policy strategy prepared under section 47 of the UK Withdrawal from the European Union (Continuity) (Scotland) Act 2021, and (c) any other strategy or plan which the Scottish Ministers consider to be relevant'*. We have concerns that c) leaves it open to require the CE Strategy to be consistent with strategies or plans that are incompatible with achieving CE aims. In these cases, the CE Strategy should require such policies or plans to be revised to be in accordance with CE principles and aims.

Section 1 (6) *'The Scottish Ministers must have regard to the circular economy strategy in making policies (including proposals for legislation).'* needs to be strengthened as 'have regard to' makes it a weak obligation. We would suggest: *'The Scottish Ministers must act in accordance with the circular economy strategy in making policies (including proposals for legislation) unless particular circumstances dictate otherwise.'*

There should be an additional point 1(8) that requires the CE Strategy to align with the principles of Just Transition<sup>1</sup>, such that provision is made for particular workforces or other groups that may be disadvantaged by the transition to a circular economy through support and training.

---

<sup>1</sup> Section 35 of the Climate Change (Scotland) Act 2019: "just transition principles" are the importance of taking action to reduce net Scottish emissions of greenhouse gases in a way which— (a) supports environmentally and socially sustainable jobs, (b) supports low-carbon investment and infrastructure, (c) develops and maintains social consensus through engagement with workers, trade unions, communities, non-governmental organisations, representatives of the interests of business and industry and such other persons as the Scottish Ministers consider appropriate, (d) creates decent, fair and high-value work in a way which does not negatively affect the current



### **3) How should circular economy strategies be aligned with climate change plans and other environmental targets (including biodiversity goals)?**

There should be general alignment between CE strategies and the climate change plans and other environmental targets. The CE Strategy should be seen as providing the mechanisms to deliver biodiversity and climate targets as well as targets that relate to reducing our footprints. There might at times be a conflict in contributing to territorial targets and reducing Scotland's global footprints. In such cases, the approach that reduces Scotland's contribution to carbon emissions / biodiversity loss overall should be favoured (because mitigating these impacts requires net global reduction), whilst also considering other social impacts.

#### **Circular economy targets**

##### **1) Are statutory circular economy targets needed?**

Yes, as outlined in the Policy Memorandum, the importance of transitioning to a more circular economy and the need for targets to guide and drive that transition, warrants statutory targets.

##### **2) Is there anything else you would like to say about powers to introduce circular economy targets? (Sections 6 and 7)**

The setting of targets needs to be an obligation, rather than optional, and there needs to be a date by which they are set. Although we acknowledge that there needs to be further thinking and development in data before a comprehensive suite of targets can be set, there are targets which could be set now/in the near future including a carbon footprint target (please see the response from Friends of the Earth Scotland for more detail), total waste to landfill and incineration, food waste, and carbon impact of total waste arising.

As such, 6 (1) *'The Scottish Ministers may by regulations make provision imposing targets on the Scottish Ministers relating to developing a circular economy'*. This wording needs to be changed such that 'may' becomes 'must' and a date by which this has to be done is included at the end: *'by 24 months after this bill is enacted'*.

6(2) lists the same 5 features as listed under 1 (3) and as such needs expanding as mentioned above.

6 (3) needs strengthening. *'Regulations under subsection (1) may in particular—'* would be more effective as: *'Regulation under subsection (1) will –'*

6 (3) (a) *'provide for targets in relation to one or more of the following— (i) reducing the consumption of materials, (ii) increasing reuse, (iii) increasing recycling, (iv) reducing waste,'* allows for (in the worse case scenario) one target on recycling to be set. An additional point is needed - (v): *'reducing the consumption of carbon and other polluting materials'* and wording needs to be changed such a minimum of one consumption based target is set. It is vital that we have a target that focuses on consumption as it is the scale of consumption of raw materials and the associated carbon impacts that drive the nature and climate crises. We could recycle 100% of our materials, but, if we continue to draw unsustainable levels of raw materials into our economy our unacceptable impacts will continue.

---

workforce and overall economy, (e) contributes to resource efficient and sustainable economic approaches which help to address inequality and poverty.



## **Restrictions on the disposal of unsold consumer goods**

### **1) Do you think there is a need for additional regulation restricting the disposal of unsold consumer goods?**

Yes, the current duty of care is not strong enough and destruction of 'like new' goods is unacceptable.

### **2) Is there anything else you would like to say about the disposal of unsold consumer goods? (Section 8)**

We would like to see a ban applied as widely as possible and do not agree with the comment in the policy memorandum that such a ban would be disproportionate. In fact, it would be easier to understand and apply if it was applicable across the board (with exceptions for any goods that are unsafe etc). Destruction of any usable goods is wasteful and bad for the environment and there is high public acceptability of the proposed measure to restrict this practice. The 'unsold' goods should be used in accordance with the waste hierarchy.

We would also like reassurance that 'consumer goods' includes goods in the supply chain - ie the ban would also apply to a wholesaler who does not sell directly to consumers.

If a phased approach to restricting the destruction of unsold goods is required, the goods with the largest life cycle impact should be prioritised; possibly food, textiles, electronics.

## **Charges for single-use items**

### **1) Should Scottish Ministers have powers to make regulations that require suppliers of goods to apply charges to single-use items?**

Yes

### **2) Is there anything else you would like to say about charges for the supply of single-use items? (Section 9)**

Objections may come from cost of living concerns. We would like to point out that charges can be applied in a cost neutral way such that the original price is split between the cost of the packaging and the cost of the content, thus not adding a cost to the consumer but rather making the cost of the packaging visible.

### **3) How do you think Scottish Ministers should use their powers to have the greatest impact in transitioning to a circular economy?**

They should use these powers quickly to introduce a charge on single use cups. There have been discussions about doing this since the EPECOM report in 2019 and a series of working group meetings in 2022/23. We suggest putting a requirement in the bill that secondary legislation is brought in to impose a charge on single-use beverage cups within 1 year of the passing of this Act. We also think that a charge could be applied to single use takeaway food containers at the same time.

Scottish Government should also introduce a national reusable cup deposit scheme alongside the charge to make reusable cups more accessible and further reduce the consumption of single-use cups. There are currently a number of reusable cup deposit scheme trials in Scotland from which learning can be drawn. However, a nationwide cup that could be returned to cafes and through the DRS collection points for other drink containers (due in 2025), would seem to be the most efficient approach.



Scottish Government should strongly signal a move to a 'refillable' economy in general, by promoting and supporting deposit schemes for other refillable containers/ packaging and retailers to sell more unpackaged goods. (Please see the response from APRS highlighting the rationale for a focus on glass).

### **Household waste**

**1) Should it be a criminal offence for a householder to breach their duty of care in relation to waste under the Environmental Protection Act 1990 (e.g. to fail to ensure that waste is disposed of to an authorised person)?**

We agree with the rationale in the Policy Memorandum for introducing this measure.

**2) Is there anything else you would like to say about household waste and enforcement of household waste requirements? (Sections 10 & 11)**

**3) Is further action needed, either within or outwith the Bill, to tackle flytipping effectively? If so, what action is needed?**

### **Household waste recycling – code of practice and local targets**

**1) Should the Code of Practice on household waste recycling (currently a voluntary code) be put on a statutory footing?**

Yes, once revised, it should be made mandatory. As explained in the Policy Memorandum, in its current voluntary form the code of practice is not fully followed by the majority of Local Authorities.

**2) Is there anything else you would like to say about a Code of practice on household waste recycling? (Section 12)**

It does say in the Policy Memorandum that the Code of Practice will cover reuse and recycling which we welcome. Reuse must be given more emphasis and put on a par with recycling and the name of the Code of Practice should be changed to reflect this.

**3) Should Scottish Ministers have powers to set targets for local authorities relating to household waste recycling?**

Yes, we agree with the rationale in the Policy Memorandum that binding local authority targets for household recycling are needed. We also acknowledge the resource implications and urge Ministers to make sure that Local Authorities are adequately resourced to meet the targets. We understand that the additional money from the reformed EPR (packaging) will help.

**4) Is there anything else you would like to say about targets for local authorities relating to household waste recycling? (Section 13)**

There should be obligations regarding reuse and/or statutory reuse targets concurrently so that reusable items are not recycled to meet recycling targets.

**5) Is further action needed, either within or outwith the Bill, to support local authorities to achieve higher household recycling rates? If so, what action is needed?**



- A sustained public awareness raising campaign
- Better labelled collection bins
- Consistency in how collection bins look
- Better labelled packaging / goods in terms of recyclability
- Compulsory sorting of residual waste such that recyclable content is diverted
- Banning the incineration of plastic

In addition, Councils need to be required and resourced to be more joined up in their own activities and enforce changes to waste management systems. They need to use planning and licensing powers to further the CE in their jurisdictions. For example, conditions on food / drink outlets such that they facilitate the use of reusables. They also need recycling and reuse targets for their own estates.

### ***Littering from vehicles***

#### ***1) Should civil penalties for littering from vehicles be introduced?***

Yes, we agree with this measure.

#### ***2) Is there anything else you would like to say about civil penalties for littering from vehicles? (Section 14)***

### ***Enforcement powers in respect of certain environmental offences***

#### ***1) Should enforcement authorities in Scotland be given powers to seize vehicles linked to waste crime?***

#### ***2) Is there anything else you would like to say about enforcement powers? (Sections 15 and 16)***

### ***Reporting on waste and surpluses***

#### ***1) Should Scottish Ministers have powers to require persons to publish information on anything they store or dispose of (except in relation to domestic activities)?***

Yes. Mandatory reporting should be a general requirement. It is needed in order to both act as an incentive to improve systems/practice to reduce waste/ surpluses; and as a useful data source such that the waste / surpluses remaining can be best used. A recent Scottish Science Advisory Council<sup>2</sup> report describes the need for information on biological waste or bio-arisings.

#### ***2) Is there anything else you would like to say on reporting? (Section 17)***

We think there should be a general requirement for organisations to report their Scope 3 emissions. This is already built into procurement guidelines<sup>3</sup>, undertaken voluntarily by some companies (for example B corps companies), and would keep pace with Europe<sup>4</sup>. It focusses minds on the sustainability of supply chains and the whole life cycle carbon impact of products and, as such, incentivises a move to more circular practices.

#### ***3) How should Scottish Ministers go about identifying which types of waste and surpluses should be subject to mandatory public reporting?***

---

<sup>2</sup> <https://scottishscience.org.uk/article/ssac-report-towards-circular-economy-scotlands-bioresource-flows>

<sup>3</sup> <https://www.gov.scot/publications/public-procurement-taking-account-of-climate-and-circular-economy-considerations-3-2022/>

<sup>4</sup> <https://www.edie.net/british-companies-not-ready-for-eus-scope-3-emissions-reporting-mandate/>



We favour this being applied to all types of waste and surpluses above a certain threshold. If a phased approach is required, food should be followed by other high impact goods such as textiles and electronics. It is worth noting that the Policy Memorandum explains that the prioritisation of restrictions on unsold goods (as discussed above) will be (in part) informed by reporting. Therefore, for that process to be properly informative, it is logical that the reporting needs to be comprehensive.

### **Net zero**

#### **1) Do you think the Bill will play a significant role in achieving Scotland's net zero targets? Please give your reasons.**

Potentially yes, if the powers are used fully and swiftly and accompanied by non-legislative measures on the ground and the bioeconomy is included. Fifty percent of our territorial emissions come from land use and agriculture and, therefore, to have more impact on achieving net zero, this bill needs to ensure that food and fiber production is circular, and land management is regenerative.

Just as importantly, it has the potential to reduce Scotland's overall contribution to climate change through reducing our carbon footprint, which includes emissions that occur overseas in the production of products and goods that we use and consume.

As mentioned in the Policy Memorandum, the powers in this Bill are mainly enabling and, as such, will have little impact until they are used to bring in secondary legislation and accompanying measures.

### **General comments or aspects not in the Bill**

#### **1) Are there any areas not addressed by the Bill that you believe should be included? If so, what are they?**

i) **Purpose clause** or explanation: The bill would benefit from a purpose clause or an explanation. As it is, it sets up processes, but does not lay out what those processes aim to achieve. Although the Strategy and Targets are linked to 5 aspirations – 1 (3) and 6 (2) – other parts of the bill are not. A purpose clause on the face of the bill would aid interpretation and could be worded along the lines of: *'The purpose of this bill is to further a transition to a circular economy in Scotland, aiming to reduce our consumption of raw materials to sustainable levels and to phase out polluting and harmful materials, including chemicals, and products.'*

ii) **Public duty:** We think that the duty to comply with the Strategy and Targets should be extended to all public bodies, including local authorities.

iii) Any company or businesses in receipt of public funds should have a necessary **condition of circularity**, in which they are required to set out how they would work to maximise circularity (this would require the robust definition of what is meant by 'circularity', similar to the one proposed above).

iv) **The Scottish Government** should be required to lead by example and set circular economy targets for its own operations, including its buildings and hospitality premises.

v) A requirement for organisations above a certain size to publicly report on their **scope 3 emissions** (as mentioned in above).

vi) **Soils** are the cornerstone of a circular economy. Soil is a vital, limited, non-renewable and irreplaceable resource. Healthy soils form the essential basis for our economy, society and environment as they produce food, increase our resilience to climate change, to extreme weather events, drought and floods and support our well-



being. With greater reliance on renewable resources and regenerative systems; the importance of soil needs to be elevated in general. The EU are proposing a soil health law<sup>5</sup>. LINK members would like the CE bill to include a commitment to:

- a Chief Soils Officer in Government to go alongside Chief Officers for plants and animals,
- carbon and phosphorus budgeting (to go alongside the existing commitment on nitrogen budgeting)
- a requirement for the Agricultural Act to include provisions such that good soil management is a condition of public funding
- a soil sealing tax

vii) A ban on single-use vapes. This Bill should be used to ban single use vapes. Considering the evidence<sup>6</sup>, public opinion and political momentum in Scotland<sup>7</sup> and south of the border<sup>8</sup> Scotland should lead the UK and the sale and manufacture of single use vapes should be banned through this bill.

viii) The CE bill should also be used to commit to **banning other problematic single use items by a certain date**. Scottish Government sought evidence on this in Spring 2022 but have brought forward no further measures. Items which should be banned include:

- 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 and straight forward.
- 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<sup>9</sup> .

In terms of other potential priorities that require research: In France, plastic food packaging is banned for about 30 types of fruit and vegetables . 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.

ix) The CE bill should also be used to **commit to bring forward EPR measures**. We are aware that UK wide EPR measures for packaging, WEE, batteries and ELV are planned/ in the pipeline. LINK members are concerned that EPR for fishing gear, previously a priority, has lost momentum. This Bill should require Scottish Ministers to bring forward EPR measures for fishing and aquaculture gear by 2026.

As part of the extended producer responsibility agenda, the Bill should also set criteria by which Ministers can require producers to accept returns of certain items, ideally as broadly as possible. This is already done by some retailers, such as IKEA and H & M, so builds on best practice. It will encourage the sale of products that can be

---

<sup>5</sup> [https://environment.ec.europa.eu/topics/soil-and-land/soil-health\\_en](https://environment.ec.europa.eu/topics/soil-and-land/soil-health_en)

<sup>6</sup> [https://www.wcl.org.uk/docs/assets/uploads/WCL\\_Disposable\\_Vapes\\_Briefing.Mar23.pdf](https://www.wcl.org.uk/docs/assets/uploads/WCL_Disposable_Vapes_Briefing.Mar23.pdf)

<sup>7</sup> <https://www.bbc.co.uk/news/uk-scotland-64336216>

<sup>8</sup> <https://www.theguardian.com/society/2023/jul/15/councils-in-england-and-wales-join-calls-for-ban-on-disposable-vapes>

<sup>9</sup> 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 may become 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.





managed further up the waste hierarchy, incentivising products that can easily be reused/ repurposed. Ministers should prioritise takeback requirements for:

- widely used items, such as food, drinks and cosmetics containers, or rechargeable vapes;
- items where the carbon impact of greater circularity would be most significant, such as consumer textiles, including clothes;
- awkward items for the public to manage at the end of their life, such as mattresses and furniture.

## **2) Are there international examples of best practice in legislation supporting the transition to a circular economy?**

Charges or other incentives are successfully used in many European countries

[https://greenbestpractice.jrc.ec.europa.eu/node/7#:~:text=Pay%2Das%2Dyou%2Dthrow%20\(PAYT\)%20is%20a,t%20the%20waste%20management%20system.](https://greenbestpractice.jrc.ec.europa.eu/node/7#:~:text=Pay%2Das%2Dyou%2Dthrow%20(PAYT)%20is%20a,t%20the%20waste%20management%20system.)

Approach in Japan - <https://www.the-ies.org/analysis/circular-economy-japan>

<https://ellenmacarthurfoundation.org/circular-examples/japans-disclosure-and-engagement-guidance>

A repair incentive voucher scheme as in Austria to encourage people to get things repaired

<https://www.euronews.com/green/2023/05/02/austria-has-helped-pay-for-more-than-half-a-million-repairs-in-bid-to-tackle-e->

[waste#:~:text=Designed%20to%20tackle%20electronic%20waste,according%20to%20the%20Environment%20Ministry.](https://www.euronews.com/green/2023/05/02/austria-has-helped-pay-for-more-than-half-a-million-repairs-in-bid-to-tackle-e-waste#:~:text=Designed%20to%20tackle%20electronic%20waste,according%20to%20the%20Environment%20Ministry.) .

Reduce VAT rates for repair, as is the case in Sweden where VAT is reduced by 50%.

Friends of the Earth Scotland (2022) [Circular Economy in Action around the world](#)

France's Anti-waste and Circular economy legislation <https://ellenmacarthurfoundation.org/circular-examples/frances-anti-waste-and-circular-economy-law>

Dutch approach: <https://www.government.nl/topics/circular-economy/circular-dutch-economy-by-2050> sets ambitious CE targets and then credible sector level plans to meet them

### **Resource and Waste Common Framework**

*The Committee is also seeking your views around how the Bill sits within a wider context of:*

- *a mixture of devolved and reserved powers in relation to tackling consumption and areas such as product standards*

Tackling consumption requires working with Westminster and other UK Governments as well as bringing in measures in Scotland due to areas of reserved policy and/or practicalities of going alone. Although the Environment Act (2021) gives Scottish Ministers powers to regulate on products in terms of resource efficiency, in practice this might be vulnerable to challenges under the Internal Market Act. However, requirements to take products back and then manage those recovered products in a more circular manner can be an effective and indirect way of promoting higher standards and more circular product design (as the costs of awkward materials recovered would no longer be externalised onto the environment, the public, and local authorities, and would

LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899), core funded by Membership Subscriptions and by grants from NatureScot, Scottish Government and Charitable Trusts.

Registered Headquarters: 13 Marshall Place, Perth, PH2 8AH

Advocacy Office: Dolphin House, 4 Hunter Square, Edinburgh, EH1 1QW



instead correctly become the responsibility of their producers). It is also worth looking to other sub-national regions that are being progressive in the circular economy for lessons. For example, Flanders<sup>10</sup>.

- *existing UK-wide schemes such as developments with Extended Producer Responsibility*

LINK members accept that it is practicable to bring forward comprehensive EPR schemes on a UK wide basis. However, LINK members are very frustrated at the slow pace and urge Scottish Government to move ahead with their own schemes where possible. We hear that there is appetite amongst businesses for regulation on producer responsibility to level the playing field and would again highlight our ask in relation to take-back as an EPR measure that is relatively easy to set up.

- *how circular economy and waste policy is influenced by the UK Internal Market Act 2020 and relevant Common Frameworks*

Part 1 of the UK Internal Market Act, especially as it concerns mutual recognition, does complicate the implementation of certain circular economy principles, in particular that “goods should be able to be sold ... free from any relevant requirements”, which clearly would cover charges on single use items where set in regulation. However, LINK members believe the Scottish Government and Scottish Parliament should act as if exemptions would be granted, where required, and then make the case for those exemptions through the Common Frameworks where those apply. We would also urge the Committee to make representations to HMG to the effect that a qualified automatic exemption be granted to the devolved institutions where a policy has environmental or public health benefits.

*Do you have comments on how this wider framework should function to support Scotland's transition to a circular economy, in particular on the provisional Resources and Waste Common Framework?*

This submission to the Committee was prepared by members of Scottish Environment LINK’s Sustainable Economy Group who work on circular economy and is supported by the following organisations:

Fidra  
Friends of the Earth Scotland  
Keep Scotland Beautiful  
Marine Conservation Society  
Nourish Scotland  
Whale and Dolphin Conservation  
WWF Scotland



**Scottish Environment LINK** the voice for Scotland’s environment

Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899



---

<sup>10</sup> <https://vlaanderen-circulair.be/en>