

Consultation Response

Response to consultation on the Circular economy and waste route map
March 2024



Scottish
Environment
LINK

Circular Economy and waste route map to 2030 consultation

Scottish Environment LINK response

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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.

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.

Consultation response

General points

It is difficult to assess what the impact of the different measures will be due to lack of appropriate targets and/or quantification of contribution towards meeting targets.

Given the urgency of climate change and biodiversity loss, LINK members are disappointed that the Scottish Government is not ready to deliver more concrete initiatives with most of the actions still being to develop a plan for future action.

Timescales are not always clear. It is not always clear what will be delivered by when.

The Scottish Government needs to explain what their "vision of a fully circular Economy by 2045" means, in quantifiable terms. Does it mean the average material use is brought down to within sustainable limits?

Circular Economy principles must be genuinely and completely embedded across all Scottish Government departments. Current efforts, such as in the Energy Strategy and Just Transition Plan, the National Planning Framework 4 and the National Strategy for Economic Transformation are a start.

Consultation questions

It is difficult to agree or disagree with the priority given to actions. Without clearer objectives and outcomes, it is difficult to ascertain what the impact of different actions will be and the extent to which we agree with their prioritisation. Saying that, the document does go some way to providing justifications in some places and we acknowledge that there are different objectives within the circular economy which makes comparing impact less straightforward.



1: To what extent do you agree with the priority actions proposed within the reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Generally agree

1a. Drive responsible consumption, production and re-use.

Priority action is to develop and publish a Product Stewardship Plan to identify and tackle the environmental impact of priority products (by 2025/26). *This will include at least three priority products for which a range of product stewardship measures will be identified, alongside delivery timelines. In determining priority products, we are considering including mattresses, tyres and textiles.*

Product stewardship is a worthy priority area and in general we are extremely disappointed at the lack of progress in this, given it was highlighted in Making things Last (2016) and included in the 2022 draft Route Map. However, moving on we would like to make the following points about its inclusion as a priority action in this consultation:

We would like additional clarification on exactly what the output will be. The Route Map mentions *This will include at least three priority products for which a range of product stewardship measures will be identified, alongside delivery timelines.* The text that follows is a bit vague and it leaves one unclear if the outcome is going to be a series of options, or a delivery plan. We strongly press for the latter – a plan of measures that **will be** undertaken within a specified time period. We would advocate for early signalling, so that industry is aware of and can prepare for measures in the pipeline.

There is justification for including textiles as a candidate for priority, but none given for mattresses or tyres. Other candidates for early product stewardship action include turbines, fishing gear, artificial sports pitches / grass¹, carpets², and toys and other categories adopted in France³. In addition, we would like to see a recognition of the importance of dealing with 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.

We welcome the plan to ensure that other aspects of the Route Map support the product stewardship approach and the specific measures prioritised under it. We would also like to see a product stewardship framework with principles and associated measures which, should over time be universally (with exemptions) applied. Take-back requirements being one such measure as we have included in previous responses.

1b. Reduce food waste

¹ <https://www.fidra.org.uk/news/is-grass-always-greener-evaluating-environmental-impact-of-synthetic-sports-pitches/>

² <https://changingmarkets.org/campaigns/carpet-recycling/#:~:text=Testing%20for%20Toxics%3A%20How%20chemicals,largest%20carpet%20manufacturers%20in%20Europe.>

³ <https://changingmarkets.org/campaigns/carpet-recycling/#:~:text=Testing%20for%20Toxics%3A%20How%20chemicals,largest%20carpet%20manufacturers%20in%20Europe.>



There is a clear justification for tackling food waste with a number of reports highlighting it as key to addressing biodiversity loss and carbon emissions⁴. The Route Map acknowledges that efforts to date have been ineffective and suggests two priority measures. First, *to deliver an intervention plan to guide long-term work on household food waste reduction behaviour change (by 2025)*. Second *to develop with stakeholders the most effective way to implement mandatory reporting for food waste and surplus by businesses (by 2025/26)*.

Regarding the first, we need more than a plan, so this action must be clarified to:

- a) Make clear that it is to design (by 2025) and deliver (on an ongoing basis) a long-term intervention plan.
- b) That this plan covers all mechanisms to support a reduction in household food waste, including behaviour change.

LINK members would advocate for the second priority to be to strengthen data and evidence (as this is needed to support the first priority). LINK members have proposed an addition to the Circular Economy Bill, mandating the reporting of volume of food loss and waste generated in Scotland, disaggregated by sector (primary production, manufacturing, retail, catering and in home); by type of waste, and by destination. It is hard to see how food waste can be effectively tackled without such data.

1c. Embed circular construction practices

Construction and demolition creates a huge tonnage of waste materials that could be better used. Commenting on this section is outside LINK's expertise. However, even a cursory read of supporting papers throws up questions.

The priority action in the Route Map is to *support the development of regional Scottish hubs and networks for the reuse of construction materials and assets (from 2025)*. It goes on to say, *'It is our view that a programme for reuse of construction materials would provide a much-needed coordinated approach to expanding reuse opportunities across the sector. This intervention provides the greatest opportunity and impact to directly support the sector to drive waste reduction and reuse, help build market confidence and provide lower carbon options for use on construction projects.'* But there is no evidence for this second sentence.

In fact, in the report on improving the reuse of construction materials⁵, published as a background paper to the Route Map; the main conclusion is *'Acknowledging business and fiscal drivers, evidence presented in this report suggests that until legislative change is implemented to support circular practises as financially preferable, sectoral change may not escalate at the desired rate to meet reduced consumption by 2025 and beyond.'*

The report (based on workshops for industry representatives) makes several specific recommendations for legislative changes and I would question why these are not included in the CE Bill? To consider such measures is included as another activity in the Route Map, but do we need more consideration, we don't have years and years to consider such options.

⁴ <https://www.sitra.fi/en/events/tackling-root-causes-halting-biodiversity-loss-through-the-circular-economy%EF%BF%BC/>

<https://cdn.zerowastescotland.org.uk/managed-downloads/mf--ux01stx-1702035701d>

<https://www.circularity-gap.world/scotland>

⁵ <https://cdn.zerowastescotland.org.uk/managed-downloads/mf-yuukt9ix-1696001112d>



Question 2: To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Generally agree

2a. Drive responsible consumption, production and re-use

Other actions under this objective include placing a charge on disposable cups and prioritising other problematic products to apply environmental charges to. LINK members are concerned that the charge alone will have little impact⁶ on reducing consumption of single use cups, which should be the aim. Parallel measures are needed. First, Scottish Government should ban all single use cups (and other single use crockery /cutlery) from closed settings, such as sit-in cafes, conference centres, work places, festivals. This should be done as a priority – there is no place for single use items in closed settings and to allow them shows a half-hearted approach to the circular economy. Second, we need a system whereby people can borrow a reusable cup and then return it, often called ‘cup deposit schemes’. Such schemes are widespread in Germany⁷ and there have been trials in Scotland⁸. They would be most efficient if operating over a large area such that cups can be picked up from and returned in different locations – this can be achieved through a single scheme or interoperability of neighbouring schemes. To include cups in the UK deposit return scheme for other drinks containers could be an option.

We support the other measures on re-use and expanding business models that prolong product lifespan; but would like to point out that, until mainstream retailers are required to be responsible for the whole life cycle impact of the products they sell/ provide; it is difficult for ‘circular’ enterprises to compete/ survive. Facilitating / enabling the reverse logistics needed for mainstream retailers to reduce their material / carbon footprints must be a priority. Reuse needs to spread from the pioneering social and innovative enterprises to the mainstream.

We also note that the work on the household recycling and reuse services comes under the next mains section, modernise recycling.

2b. Reduce food waste

Of a total UK fish and shellfish resource of 851,984 tonnes, it is estimated that 43% (359,964 tonnes) ends up as products for human consumption and the remainder (492,020 tonnes) is classed as waste⁹. This valuable source of protein can be used in a variety of applications, including but not limited to: fish feed, pet food, fertilizer and composting. There are emerging markets for shell use from shellfish processing, such as for use as an aggregate and building material, however this would require the development and modernisation of facilities to maximize these opportunities and investment to explore these markets further.

2c. Circular construction

As mentioned above, LINK members do not have expertise in construction. However, in line with recommendations in the background report mentioned and various conversations we have had with the

⁶ <https://www.cardiff.ac.uk/news/view/687689-curbing-coffee-cup-usage#:~:text=The%20study%20found%20that%20a,led%20to%20a%20further%20increase>

⁷ <https://www.circularx.eu/en/cases/95/recup-reusable-containers-for-food-on-the-go>

⁸ <https://www.keepsotlandbeautiful.org/cup-movement/choose-to-reuse/highland-cup-movement/>

⁹ Fish Waste Production in the UK - The quantities Produced and Opportunities for Better Utilisation . Seafish. Available online at: <https://www.seafish.org/document/?id=b20daade-1e6e-4204-bf46-e353a255f93a>



construction sector over the last few years, we think that mandatory compliance with existing and new standards should be introduced as soon as possible.

Question 3: To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Generally agree

LINK members would probably agree that to facilitate the co-design process for high quality, high performing household recycling and reuse services is worthy of priority status, given it needs to precede other measures; alongside the measures to improve commercial recycling. We would also like to see the development and delivery of a statutory code of practice given priority status.

Question 4: To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Generally agree

The first action is particularly important: *Develop a statutory code of practice for household waste services (by 2025/26)* and there is a danger that we would see little improvement in household recycling and reuse services without it. We would therefore like it to have priority status.

In relation to the other actions:

Introduce statutory recycling and reuse local performance targets for household waste services (from 2030). There needs to be reuse targets for businesses as well, or possibly, one target that applies to both household and business reuse.

We would like to see an action on the development of a steel recycling plant in Scotland as recommended by ZWS¹⁰.

Question 5: To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Neither agree nor disagree

Develop and deliver a Residual Waste Plan to 2045 (develop by 2025/26). This needs a more ambitious timeframe and should be amended to *Develop and deliver a Residual Waste Plan to 2045 (develop by 2024/25) and delivered thereafter.* It must include improved pre-sorting, as recommended by the Independent review of the role of incineration¹¹.

Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26). This should be amended to: *Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26) and the delivery of*

¹⁰ <https://cdn.zerowastescotland.org.uk/managed-downloads/mf-qwstm9se-1688475468d>

¹¹ <https://www.gov.scot/publications/scottish-government-response-stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland-second-report-decarbonisation-residual-waste-infrastructure-scotland/pages/2/>



that Plan thereafter. As well as operators, development of the Plan must involve ENGOs, community groups and other organisations with an interest.

There should be an additional priority action to introduce the capacity cap for incineration as mentioned in the text, but not identified as an action.

Question 6: To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Generally agree

Consultation questions Question 7: To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Agree

The priority actions:

Develop a Circular Economy strategy every five years (from 2025). 'From 2025' is rather ambiguous. We need a date by which the first strategy will be developed. There must be a clear link between the Strategy and the targets (below) with the Strategy including Plans on how to meet the targets. As such, it is more logical to list the priority action on target setting before the priority action on the strategy.

Set new circular economy targets (determined from 2025). Again, clarity on the time frame is needed. This is urgent and the Scottish Government should set these targets as soon as possible and by 2025 at the latest. Targets need to drive a reduction in our consumption of materials, especially carbon intensive materials, and use and leakage of harmful materials/ products. Targets should include carbon and material footprint targets and a reuse target.

There should be an additional, third, priority action on public procurement (currently under 'other actions') which needs to reform public procurement such that it contributes to Scotland's transition to a circular economy by, for example, using leasing models, refurbished equipment, putting take back requirements onto suppliers, specifying reuse / recycled content (depending on product). The Environment strategy outcome on Scotland's economy report¹² has useful recommendations on this. Mandatory due diligence guidelines should be developed and followed for all public expenditure.

Question 8: To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Agree

These are all important activities and need to be strengthened. Legislative measures are needed to ensure a robust commitment to Just Transition and to drive the changes needed in procurement.

¹² <https://www.gov.scot/publications/environment-strategy-scotland-delivering-environment-strategy-outcome-scotlands-economy-evidence-base-policy-levers/documents/>



This response is supported by the following LINK members:

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