

**Circular Economy Strategy – consultation response**

January 2026

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 organisations, 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 Sustainable Economy group.

1. Response**Question 1: To what extent do you agree with the vision and outcomes for the strategy?****Somewhat agree****Question 2: Do you have any comments on the vision?**

We welcome the vision to be a net zero and nature positive nation with the inclusion of reduced impact of production and consumption. However we would have welcomed the inclusion of waste too and the importance of building a safe circular economy.

The vision should include a goal to achieve a circular economy in Scotland by 2045. This means Scotland would become a society where materials are used fairly and sustainably. Currently, [Scotland's material footprint is more than double the sustainable limit](#) and still increasing.

The Circular Economy (Scotland) Act requires the CE strategy to consider how the “processes for the production and distribution of goods, products and materials are designed so as to reduce their consumption and their whole life-cycle carbon emissions”. The vision in the CE draft strategy only states: “we will have reduced the negative global impact of our production and consumption”. It does not explicitly mention reducing consumption or whole life cycle carbon emissions, so the draft vision is not meeting the requirements of the Act.

The vision should prioritise people and nature over profit. It must include a commitment to reduce the consumption of materials in Scotland and the environmental impacts associated with them.

The vision must also be more ambitious for the Scottish Government's circular economy aims at an international level: the products we buy in Scotland should not harm people and nature in other countries.



Current manufacturing and recycling practices are locking harmful chemicals into primary products, limiting repurposing, reuse and recycling opportunities (e.g. mattresses treated with flame retardant chemicals) or contaminating secondary materials (e.g. paper contaminated with endocrine disrupting, bisphenols). The use of harmful chemicals adds to the waste burden and makes it more toxic.

We do not believe that this strategy goes far enough in ensuring single-use products are replaced with reusable options, or that reuse and repair is prioritised enough. We also don't believe that the Strategy is clear about how its impact will be quantified or measured, and would call for targets to reduce consumption, at least to within planetary limits, to be introduced.

Many items which could be recycled and incorporated in a circular economy end up littered and not captured in the waste stream. This leads to harmful material in our environment – 9 in 10 people think litter is a national problem in Scotland. The Strategy must clearly acknowledge litter as a form of pollution and resource leakage and link to other policy instruments including the National Litter and Flytipping Strategy and Marine Litter Strategy.

Beachwatch is the Marine Conservation Society's national beach cleaning and litter surveying citizen science project, which includes the annual Great British Beach Clean. Beachwatch has been tracking litter data since 1994 and is now one of the largest and most comprehensive datasets on beach litter across the UK. This data is used to provide vital evidence for policy change, such as the carrier bag charges and single use plastic bans and highlights where there are gaps in our move to a circular economy.

With 527,468 pieces of litter removed by volunteers across surveyed beaches in Scotland in 2024 we would have welcomed an inclusion of the positive impact a circular economy would have on reducing pollution in Scotland including marine litter, plastic and chemical pollution.

On incineration, all forms of Energy from Waste (e.g. incineration with energy recovery) should be considered a 'leakage' from the circular economy rather than simply the lowest tier of the circular economy. It is a form of disposal and burning potential resources means that they can never be used again. Both landfill and incineration are harmful to circular economy efforts, as they establish and maintain the linear economy system of 'take, make, dispose'.

Question 3: Do you have any comments on the outcomes?

The outcomes should include a reduction in material consumption and its associated environmental impacts in Scotland.

On environmental outcome 1, non-renewable resource extraction should be reduced in line with the Scottish Government's net zero target for 2045.

We support environmental outcome 2 and suggest that this includes a goal to reduce Scotland's material impacts within planetary limits. Rather than 'negative impacts' this goal should be more precise in naming these as 'environmental damage and social harms'. Economic outcome 2 should be revised to '*Scotland uses less materials, including transition minerals, which makes it more resilient to disruptions in global supply of materials.*' This would ensure that reduction in material use is included in the outcomes. The environmental and social impacts of material use must be put before GDP growth in the strategy.



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As highlighted above with 527,468 pieces of litter removed by Marine Conservation Society volunteers across surveyed beaches in Scotland in 2024 we welcome the inclusion of 'disposal' in the outcomes and would like to see this reflected in the vision too.

We also welcome the inclusion of litter within the 'social' outcomes and would also recommend this is brought into the 'economy' outcome through policy work to drive circularity and where single use is still the only option fiscal measures are implemented with ringfenced funding for clean-up and monitoring for pollution.

Behaviour change amongst the public, industry and the public sector must be supported by policy measures as well as legislation to be successful. In addition to plastic that is littered a significant volume of plastic is wasted due to losses in the supply chain and poor waste management resulting in loss of resource and pollution. For example plastic pellets are escaping from plastic industry supply chains in Scotland into our environment.

We recognise the importance of behaviour change to improve our environment, support people to make different choices and understand the challenges and benefits. We know that positive individual choices can and do have a powerful impact on our environmental challenges. However, it is unfair to ask individuals to change their behaviour if the infrastructure needed for that behaviour isn't in place.

We know from our work to encourage people to bin their waste that even when infrastructure is there, it often isn't used, and that huge investment is needed in behaviour change campaigns, evaluation and interpretation to nudge people to take different actions.

We strongly believe that circular systems and behaviours need to become the norm – led by the Scottish Government and implemented and funded by industry. The proposed charge on single-use beverage cups, if reinvested in reuse and recycling infrastructure and campaigns could shift behaviours making reuse the norm. We propose that the outcome is changed to "Circular systems and behaviours are the norm across business and society."

A well-designed circular economy should be safe, with a reduction in plastic and chemicals use and pollution.

Policy Mechanisms:

Taken on its own terms, the main problem here is that none of the policy mechanisms include timescales or an estimation of the impact they are expected to have. Without such basic levels of quantification and targets based on them, this strategy is meaningless. The policy mechanisms should each include timescales for implementation and an estimate of the contribution that each one will make to achieving the vision.

There is no evidence that the policy mechanisms suggested can achieve the vision and outcomes.

Business support

This policy mechanism should be changed to 'enforcing **responsible** business practices', which is more critical to the success of a circular economy.

Behaviour change

Systemic change is required as well as behavioural change - asking people to do the right thing when the



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systems around them are broken (e.g. asking people to recycle more when most of the products they buy can't be recycled easily) is unfair.

Procurement

We support the development of circular economy measures for procurement.

Skills and education

We strongly support the need to develop skills and education around the circular economy, if this is embedded in just transition principles so that people and communities are part of the planning and delivery of change.

Circular economy data

We support this policy mechanism.

Policy alignment and systems thinking

Scotland's circular economy plans should align with UK and EU progress, as much as possible.

Question 4: To what extent do you agree with the policy mechanisms identified?

Somewhat

Question 5: Do you have any comments on the policy mechanisms identified?

We support the introduction of new regulations as soon as possible to set minimum recycled content and reuse as a key policy mechanism to help move procurement to become more circular.

We are concerned about the lack of timescales given for the policy mechanisms, or an indication of the impact they are expected to have. We would expect some targets to be outlined, and a timeline defined at this stage.

We believe that businesses must be enforced to be responsible, and influencing, as outlined in the policy mechanism for business support, does not go far enough.

Additionally we are concerned about the lack of detail provided on investment – as there is a strong case for public and private investment being needed to support systems that we must invest in to ensure people can shift behaviours.

We would also like to see the continuation of the work with other UK governments to improve the circularity of fishing and aquaculture gear.

Funding will also be critical to support small businesses and trials for circular systems like reusable packaging.

We support the development of an ambitious Extended Producer Responsibility programme, which prioritises product categories with significant environmental impacts. The Scottish Government should revert to a specific focus on EPR, rather than product stewardship in general. EPR is a mandatory form of product stewardship that makes producers responsible for post-consumer waste, while product stewardship is a broader approach, often involving voluntary measures that shares responsibility for a product's lifecycle among all stakeholders, including producers, retailers, and consumers.



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Question 6: Do you have any comments on the associated plans and priorities?

We would like to see regulation and monitoring given a stronger feature in the associated plans and priorities.

There is a clear need for national leadership and guidance in addition to sustainable funding models to frame local action if a place-based approach to circular economy is taken.

The priority to 'integrate circular economy principles across policy' is welcomed, and we would encourage further integration with UK REACH to inform chemical control regulations and prevent harmful chemicals from being used in products in Scotland which can hamper a safe circular economy. Materials can only be safely reused, repurposed and recycled if harmful chemicals are eliminated and there is full chemical disclosure through initiatives such as product passports. We would also welcome further integration with the Water Framework Directive which sets priority substances and watchlists and can be used to inform chemical and product regulations if pollutants are identified.

Question 7: To what extent do you agree with the priority sectors identified?

Somewhat

Question 8: Do you have any comments on the priority sectors identified?

A purely sectoral approach, which lacks material specific measures is dangerous. It could lead to the failure to adopt economy-wide measures. All sectors must take action to achieve a circular economy in Scotland.

We welcome the inclusion of textiles as a priority sector but we are disappointed to see no mention of plastics or chemicals at all within the strategy. We recommend including these either within the sectors as plastics and chemicals are used across all five sectors or separate sectors for plastics and chemicals are created as Scotland is both a producer and user of plastic and chemical products with an active plastic and chemical industry.

A new priority area on plastics in the CE strategy must include plans to:

- Measure and reduce how much plastic is produced, used and disposed by Scotland
- Enforcing and expanding the single use plastics bans.
- New research on the impacts of chemicals in plastic on people and nature, including health costs, and recommendations on how to reduce these impacts.
- Banning the burning of plastic in incinerators.
- Enforce bans on exporting plastic waste.
- Improve recycling data reporting to understand how much plastic is sent to recycling, how much is actually recycled (and where and how) and what happens to the rest.
- Invest in affordable, reusable alternatives to plastic-based systems such as packaging.

We are waiting on England publishing their Circular Economy Growth Plan which includes agri-food, the built environment, chemicals and plastics, electrical and electronic equipment, textiles, and transport as their priority sectors and it could be helpful to align these across the nations to make it easier and quicker for industry to shift towards more circular ways of working.



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Question 8a: Do you have any comments on the plans and priorities for the built environment?

Chemical flame retardants are widely used in building insulation foam and timbers and the options for recycling these materials are limited due to the presence of these chemicals. The government must support the production of innovative building construction products that utilise naturally fire resistant materials like wool and hempcrete and facilitate their use in mainstream building construction to reduce the use of harmful chemical flame retardants.

Question 8b: Do you have any comments on the plans and priorities for the Net Zero Energy Infrastructure?

The international harms of material extraction and production for the energy transition are [well documented](#) and increasing. The UK has a critical mineral strategy but Scotland does not, despite our energy and transport plans relying on access to materials, such as lithium, nickel, steel and cobalt. The Scottish Government must create a critical mineral strategy that meets Scotland's energy, transport and consumer needs whilst minimising human rights and environmental harms in supply chains.

Question 8c: Do you have any comments on the plans and priorities for textiles?

Our clothes are made of millions of tiny fibres, the majority of which are plastic. These small plastic fragments, measuring 5mm or smaller, are called microplastic fibres and are shed from synthetic clothes when produced, washed and worn. Globally, more than 840 million domestic washing machines are used and with every wash, these microfibres are shed and released into the water. They then make their way into the environment, with many ending up in the ocean and on our beaches. Research has estimated that between 700,000 and 7 million microfibres are released with every wash.

In the North Sea, 63% of shrimp have been found to contain synthetic fibres. The ingestion of microplastics by organisms such as shrimps is shown to negatively impact feeding behaviour, growth, development, reproduction and lifespan.

Textiles production is one of the largest users of plastic after packaging and construction with 92 million tonnes of textile waste produced across the world each year. According to the UN 11% of plastic waste comes from textiles with only 8% of fibres in 2023 made from recycled sources. Each stakeholder in the supply chain for fashion and textiles needs to play a role in tackling microfibre pollution and we would recommend including the mention of microfibres in the strategy and commitments to work with industry including retailers.

By influencing design choices, supply chains, and consumer behaviour, retailers have the potential to significantly reduce microfibre pollution. This could involve adopting sustainable materials, improving garment durability, supporting innovative washing solutions, and educating customers about responsible care practices. Addressing microfibre pollution is not only essential for our ocean but also provides an opportunity for retailers to lead in sustainability and meet growing consumer demand for eco-conscious products with research by the 'Changing Markets Foundation' showing 50% of consumers would support legislation to tackle microfibres.

In addition in Scotland (and the rest of the UK) many textiles used in furniture and furnishings are currently unable to be safely reused, repurposed or recycled due the presence of harmful chemical flame retardants. For example chemical flame retardants polybrominated diphenyl ethers (or PBDEs) were banned and classified as Persistent Organic Pollutants and waste furniture and their textiles containing these legacy chemicals must now



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be incinerated, to prevent similar issues in the future harmful chemicals should be banned and chemical transparency implemented. Forever chemicals, PFAS, used as stain and water resistance, are another group of problematic chemicals that contaminate textiles. Scotland should not only seek product regulation alignment for textiles but also alignment on regulations on chemicals, as the EU are taking action to address harmful chemical use through REACH including flame retardants and PFAS.

Question 8d: Do you have any comments on the plans and priorities for the transport?

The material demands of our transport system are unknown. There is a risk that transport plans cannot be fulfilled because of material shortages. There are also opportunities to create more circular systems for transport options in Scotland which must be realised to reduce our demand for transition minerals.

A Scottish critical mineral strategy is needed which considers the supply chain challenges and opportunities for each critical mineral identified.

Question 8e: Do you have any comments on the plans and priorities for the food system?

Despite Scotland throwing away one million tonnes of food waste a year and levels increasing by 5% between 2013 and 2021, when the target was a 33% reduction, there is no mention of a food waste target in the circular economy strategy. Food waste is a key driver of climate emissions. None of the 'actions' listed in the plan, which focus on reporting and research, will directly deliver changes in food waste. It is not possible to understand what the Scottish Government's goals around food waste reduction are or how they are going to achieve them with this plan.

Delivering a safe circular economy strategy requires taking a broader approach to food production and health that ensures the long-term sustainability and security of Scotland's agricultural systems. Repeatedly introducing chemicals to farmland contaminants through sewage sludge application and pesticides can irreparably damage the soil ecosystems upon which food security depends.

Food packaging is another area of the food systems that needs to be addressed. PFAS was found in 8 out of 10 samples from supermarkets and in 100% of samples tested from takeaways in Scotland in research for Fidra's *Forever chemicals in the food aisle: PFAS content of UK supermarket and takeaway packaging*. In 2020, Denmark banned the use of PFAS in food packaging, which has since been followed by an EU-wide restriction on PFAS in food contact materials due to take effect in 2026.

Most food and drink that is wasted has not fulfilled its purpose – it has not been consumed, so we strongly believe that waste prevention should be a priority. We would like to see more focus on food redistribution and the sharing of surplus fresh produce in communities – linked to enhanced community and school growing projects.

We recognise and welcome the acknowledgement in the Strategy that food and drink supply chains generate significant amounts of waste and have a massive environmental impact – particularly as packaging often ends up as litter polluting communities and our environment. As referenced in our summary and answer to Q5 and Q9 we believe there is a stronger role for Extended Producer Responsibility for packaging regulations to play in this area.



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It is our view that an ambitious Extended Producer Responsibility programme, including addressing littered single-use packaging items to drive and incentivise producers to reduce waste and redesign products. Needs to be driven forward and consistently raised at a UK Government level.[\[SR1\]](#)

Our litter audits across Scotland identified that 42.7% of sites had at least one item in scope of Extended Producer Responsibility for packaging (pEPR) regulations, and 18.6% of all litter counted was in scope.[\[1\]](#) We have continued to call for the Scottish Government to maintain its commitment and support for pEPR regulations being extended to cover littered packaging, and to ensure litter payments form a key component of reforms in line with the polluter pays principle. Ultimately, we want to see single-use packaging producers design out the most problematic items and, in the meantime, take financial responsibility for its destruction and support litter education, infrastructure and waste management.

We believe that the timescales for existing proposed pEPR schemes do not reflect the urgency or pace of action that is needed to adequately challenge the currently unsustainable patterns of overconsumption, nor do they drive progress in dealing with the environmental crises we face.

[\[1\] Keep Scotland Beautiful Tackling the litter emergency – making the case for packaging EPR to include ground and binned litter 2024](#)

Question 9: Do you have any comments on the proposed approach to product stewardship?

The Scottish Government must focus on delivering Extended Producer Responsibility schemes, utilising the powers it already has to support an urgent reduction in the consumption or the stuff we use and buy.

Research shows that 71% agree with the general principle that producers should bear financial responsibility for managing packaging waste and litter.

We believe that pEPR regulations will push producers to create packaging less harmful to our environment and deliver a polluter pays principle.

We welcome the inclusion of packaging reuse and refill with priorities for product stewardship including packaging and end-of-life fishing gear.

Product stewardship should be extended to cover a greater range of cosmetic, pharmaceutical and personal care products in line with the EU's new Urban Wastewater Treatment Directive (2024/3019/EU). This new Directive will improve water sector circularity and make quaternary treatment mandatory for major treatment plants, removing harmful micropollutants before they can reach water bodies and the wider environment. Furthermore, 80% of the cost of quaternary treatment will be paid for by the polluters through extended producer responsibility schemes.

Cups

In 2024 the Scottish Government consulted on introducing a mandatory minimum charge on single use disposable beverage cups in Scotland, which we supported with Beachwatch data. This follows the recommendations highlighted by the Expert Panel on Environmental Charging and Other Measures (EPECOM) report in 2019.



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With 5,230 single-use cups found by Beachwatch volunteers in 2024, we need to look at policy interventions to reduce single-use cup use and encourage reusable and refillable options.

We would therefore like to see the following actions mentioned in under product stewardship for cups:

1. Introduce a charge on all single-use cups
2. Set binding consumption reduction targets
3. Improve design and labelling for consumers to know when cups contain single use plastic and how to correctly dispose
4. Invest in pathways to reusable and refillable systems
5. Ban single-use cups in closed settings (e.g. workplace canteens)

There is a clear role for policy makers to ensure reuse can be scaled up successfully through charges on disposable cups, funding for infrastructure and setting the timeline and targets for reuse at a national scale.

Fishing gear

Across 2024, data was collected from 181 surveys of beaches across Scottish islands by Marine Conservation Society and Scottish Islands Federation volunteers. Several island groups have significantly higher amounts of litter than the Scottish average of 204 litter items per 100m. This includes the Argyll Islands with 849/100m, Shetland with 481 items per 100m, and the Highland Islands with 225 items per 100m.

The data showed that 32% of island litter comes from fishing and aquaculture sources (such as ropes, creels, feed pipes, and netting). This compares to just 12% on the Scottish mainland.

Litter dropped by the public makes up just 31% of marine litter recorded on Scottish islands, compared to 40% of litter found on mainland beaches with the average size and weight of beach litter on Scottish islands being significantly higher than on the mainland – creating further problems for its removal. The removal of marine litter can cost UK ports and harbours on average €2.4 million, or nearly £2 million per year.

As part of the work to improve circularity for end-of-life gear we would like to see a four-nation commitment to introduce free, standardised waste reception facilities at all ports and harbours in Scotland alongside equivalent facilities for aquaculture sites.

We would also like to see action building on the existing Marine Litter Strategy and develop an evidence-based roadmap to tackle fishing and aquaculture gear pollution with circular solutions, especially for the Scottish islands in conjunction with island communities.

Question 10: Are there any changes or additions that you would like to suggest in relation to the Circular Economy Monitoring and Indicator Framework to ensure it is fit for purpose?

The exclusion of a carbon footprint indicator is a glaring omission from the monitoring and indicator framework. The CE (Scotland) Act requires that the CE strategy relates to the production, use and disposal of goods, products and materials to reduce their consumption and whole life cycle carbon emissions. It is therefore appropriate that the CE strategy should embed references to consumption reduction measures throughout, including in the vision, outcomes and monitoring and indicator framework.



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Material and carbon-based consumption reduction targets are the best way of meeting the requirements of the CE Act. 86% of respondents to the Scottish Government's consultation on the circular economy bill, and the Net Zero, Energy and Transport Committee during its scrutiny of the bill, supported the introduction of consumption reduction targets. These must be included in the monitoring framework too.

We would like to suggest that citizen science litter datasets including Beachwatch and Upstream Battle, and data collected across local authorities and reported by the Improvement Service are used to monitor impact of change towards a Circular Economy which should reduce litter.

Further measures are needed to monitor the control of chemicals, the reduction of harmful chemical use, and ending unnecessary chemical use. It would make sense to include a cross-cutting indicator on chemical pollution to ensure that the circular economy in Scotland is monitoring positive and negative impacts and is then able to implement or adjust policy according to the data. Otherwise, there is a danger that the circular economy develops toxic recycling loops which when discovered will undermine the overall aims of the circular economy.

Similarly the resource use and resource loss from the petrochemical sector must be addressed and monitored with chemicals and plastic controlled and waste (which includes pollution) prevented at source for a safe and successful circular economy. Monitoring and addressing the pollution/resource loss and resource use of the petrochemical sector will therefore be essential to ensure a safe and successful circular economy.

Question 10a: Do you have any comments in relation to the indicators proposed for outcome “The economic value derived from material use is maximised without increasing our environmental impacts”?

The monitoring framework should include indicators on the development and uptake of measures that help maximise the value and longevity of materials such as reduction in the use of harmful chemicals and introduction of chemical transparency along supply chains, through digital product passports.

GVA of circular economy sectors should not be an indicator as it is likely to incentivise increased use of materials and waste. The more materials the ‘circular economy sectors’ use and waste they generate, the greater their GVA will be. GVA does not distinguish between desirable and undesirable economic activity.

Instead, the proportion of GDP (or GVA) related to CE activities, split by the waste hierarchy levels as defined in section 1(4) of the CE (Scotland) Act should be used as an indicator (these are: waste prevention, preparing for reuse, recycling, recovery and disposal). This will show what proportion of the economy is related to CE activity. It can be increased without leading to increases in material use or waste.

Question 10b: Do you have any comments in relation to the indicators proposed for outcome “The Scottish economy is more resilient to disruptions in global supply of materials, including critical raw materials”?

Instead of the suggested indicators, the Scottish Government should create a critical mineral strategy which lists the main minerals required to meet its energy and transport plans which have supply chain problems. It should estimate the amount of these materials needed and measure the supply of these materials over time. It should measure both the domestic (and UK) supply and make efforts to understand where these materials are coming from, globally. It should measure the reuse and recycling rate for each transition mineral.



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Question 10d: Do you have any comments in relation to the indicators proposed for outcome “Non-renewable resource extraction is minimised and renewable resource use is sustainable”?

The indicators do not adequately address the petrochemicals sector’s role in resource use or the unnecessary use of harmful chemicals. Fidra has identified unnecessary uses of chemicals such as PFAS in school uniforms, and chemicals flame retardants in furniture which are not bringing benefits to consumers and are in fact damaging human health and the environment. As outlined by the UN Chemical Outlook chemical production is a major contributor to resource extraction and energy use. Indicators showing the steps Scotland is taking to end the unnecessary use of chemicals are needed such as implementing Ecodesign regulations which enforce safe and sustainable design principles and measures such as product passports.

Question 10f: Do you have any comments in relation to the indicators proposed for outcome “The negative impacts experienced internationally from production, consumption and disposal are reduced”?

Many of the products produced and used in Scotland cause pollution and waste during production and transport, not just from waste exports. For example, plastic pellets produced in Scotland are known to be shipped to Europe and have spilled on route, with the latest incident occurring in [the North Sea in March 2025](#) with internationally important nature areas impacted. These plastic pellet spills and losses can be prevented with a legislated supply chain approach which mandates pellet loss prevention measures. The monitoring framework should include indicators on the development and uptake of these measures, measures of pellet loss in Scotland which can spread globally, as well as addressing circularity of products produced by Scottish petrochemical plants which are shipped internationally.

Question 11: Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment

Groups such as those who are pregnant, children at key development stages and women are particularly vulnerable to exposure to harmful chemicals in the environment, in products and in the workplace. To protect people from harmful chemicals and to ensure safe materials, products and opportunities in a circular economy, the impacts of chemicals must be considered.

Question 12: Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment

It is important to recognise that relying on consumer choice and consumer behaviour to opt for more circular products such as those free from harmful chemicals, such as PFAS-free school uniforms, creates a distinct disadvantage to those without the awareness, time or resource to seek out these alternatives. Whilst consumers behaviour can help support broader change, regulation is essential to ensure circular products free from harmful chemicals are available and accessible to all.

Question 14: Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment

Harmful chemicals can result in significant resource losses as they contaminate and devalue materials. To maximise the value and longevity of materials, harmful chemicals must be addressed at source. Preventing excessive and unnecessary use of chemicals and enforcing chemical transparency along supply chains, such as



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through digital product passports, can also help ensure appropriate reuse and disposal of products when required.

Question 15: Please provide any further information or evidence that should be considered in the accompanying Consumer Duty Impact Assessment

Consumers are often unaware of the chemicals that are in products and their right to request information about the presence of substances of very high concern under UKREACH is often not enacted, with retailers and suppliers reporting a lack of information. This lack of information also hampers recycling efforts. We believe consumers have a right to know what is in their products and support the introduction of products passports with full chemicals and minerals disclosure to better information the entire supply chain including consumers, retailers, recyclers and waste processors.

Please note however that the burden of avoiding harmful chemicals in products should not be placed on the consumer, and regulation to phase out harmful chemicals is essential to ensure safe products are available for all – see Question 12.

Question 16: Please provide any further information or evidence that should be considered in the Child Rights and Wellbeing Impact Assessment

Children are particularly vulnerable to exposure to harmful chemicals in the environment, in products and in the workplace. To protect people from harmful chemicals and to ensure safe materials, products and opportunities in a circular economy, the impacts of chemicals must be considered.

Question 17: Do you have any views on whether there are likely to be any positive or negative environmental impacts from the draft Environment Strategy that have not been identified in the Strategic Environmental Assessment?

Unless the Circular Economy Strategy is fundamentally changed to prioritise care of people and nature over GDP growth, it is likely to fail to stop, and could even contribute towards, significant environmental harms by contributing to the climate crisis and pollution levels. For example, support for businesses without holding them to account for selling harmful and wasteful products could increase the problems of our throwaway society.

If the circular economy strategy addresses harmful chemical use, negative impacts to the environment can be avoided. Circularity must not come at the cost of product safety, human or environmental health.

This response was compiled on behalf of LINK Sustainable Economy Group and is supported by:

Action to Protect Rural Scotland (APRS)

Fidra

Friends of the Earth Scotland

Keep Scotland Beautiful



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