

Scotland's draft Circular Economy and Waste Route Map to 2030 - consultation

Reducing and reusing waste are the first goals of the waste hierarchy and central to changing our relationship with materials and products. Building an economic system that moves away from being based on items that are designed to be disposable will bring significant environmental benefits.

In this section, we have three main objectives:

- Drive responsible consumption, production and re-use
- Reduce food waste
- Embed circular construction practices

Read more on the [Route Map](#).

Objective 1: Responsible consumption, production and re-use

Priority action:

- Develop and publish a Product Stewardship Plan to identify and tackle the environmental impact of priority products (2025/26)

Further actions:

- Deliver a prioritised approach to the introduction of environmental charges for problematic products (by 2025)
- Introduce a charge for single-use disposable cups (by 2025)
- Consult on actions regarding the environmental impacts of single-use vapes (ongoing)
- Review the feasibility of setting reuse targets (from 2025)
- Develop restrictions on the destruction of unsold consumer goods (from 2024)
- Develop measures to improve the reuse experience for consumers (ongoing)
- Deliver behaviour change-based approaches focused on sustainable consumption, aligned to Let's Do Net Zero communications (ongoing)
- Identify ways to expand business models that prolong product lifespan (ongoing)

Objective 2: Reduce food waste

Our Review of the 2019 Food Waste Reduction Action Plan outlines that we need to reset our approach to tackling food waste (see chapter 2). The actions outlined below are based on the evidence we have so far on how best we can reset our approach. We welcome views on how to enhance this to ensure our reset delivers at the speed and scale required to see sustained food waste reduction results.

Priority actions:

- Deliver an intervention plan to guide long-term work on household food waste reduction behaviour change (by 2025)

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- Develop with stakeholders the most effective way to implement mandatory reporting for food waste and surplus by businesses (by 2025/26)

Further actions:

- Strengthen data and evidence (ongoing)
- Review the rural exemption for food waste recycling, as part of recycling codesign process (in 2024/25 and 2025/26)
- Investigate feasibility of action plans (after 2025)
- Deliver enhanced support for businesses (ongoing)

Objective 3: Embed circular construction practices

Priority action:

- Support the development of regional Scottish hubs and networks for the reuse of construction materials and assets (from 2025)

Further actions:

- Develop new and promote existing best practice standards in circular practices within the construction sector, and assess the options for both voluntary and mandatory compliance (ongoing)
- Investigate and promote options to incentivise and build capacity for the refurbishment of buildings (by 2026/27)
- Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill (by 2026/27)
- Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction (from 2024)
- Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices (ongoing)

Questions

1. To what extent do you agree with the priority actions proposed within the Reduce and Reuse strategic aim?

- Strongly Agree Agree Neither agree nor disagree Disagree
 Strongly disagree Not answered

Please provide evidence to support your answer if possible

Develop and publish a Product Stewardship Plan to tackle the environmental impact of priority products (by 2025/26)

ABC expresses concern about the oversight in product stewardship plan proposals related to priority items like tyres, mattresses, and textiles. These proposals need to address Persistent Organic Pollutants (POPs) adequately, and there is a notable absence of initiatives incorporating POPs into Extended Producer Responsibility (EPR) frameworks, thereby burdening local authorities.

The impact of POPs legislation on the circular economy is a growing concern for ABC. While the new legislative landscape overlooks POPs in the circular economy route map, it may lead to increased incineration of domestic furniture and seating.

Additionally, emerging POPs regulations might affect Waste Electrical and Electronic Equipment (WEEE). ABC questions how POPs legislation aligns with promoting a circular economy and expresses concerns that additional charges may increase fly-tipping incidents.

In specific regions of Scotland, particularly the Highland Councils and the Islands and Argyll & Bute, managing POPs presents significant challenges due to geographical constraints and logistical difficulties, especially with ferry transportation—the associated expenses further strain local councils.

Strategic interventions are necessary to effectively address the disposal and management of bulky waste containing POPs. ABC firmly advocates for a producer compliance scheme to handle the complexities of these challenging waste materials. The scheme should shift responsibilities and costs from local councils to the producers, ensuring accountability for the entire lifecycle of products, including proper disposal.

Haulage is a significant issue, particularly for POPs, given the high costs and logistical challenges of transporting substantial quantities to central locations. Local authorities need more financial support and resources to manage these issues effectively. Advocating for increased financial support, potentially through grants, subsidies, or specific funding tailored to regions with higher logistical challenges, becomes crucial.

ABC seeks clarity on the types of textiles covered under a product stewardship plan, as textiles encompass a wide range of products.

However, ABC welcomes the development of a Product Stewardship Plan by 2025/26, focusing on three priority products, including mattresses, tyres, and textiles. This approach addresses the limitations of the current system. It introduces extended producer responsibility (EPR) schemes for priority products, relieving local authorities of the burden of responsibility at end-of-life.

EPR for priority products aligns well with the proposed strategic aim under reduce and reuse, and ABC acknowledges that this could draw on the experience from more mature EPR schemes. ABC is aware of preliminary work by the Scottish Government on investigating an EPR scheme for mattresses, which could enable a relatively swift introduction.

Building upon current policies like EPR to drive progress in reuse, repair, refurbishment, and reducing the need for new products is welcomed by ABC. Engaging with the UK Government and other developed governments to encourage improved product design is essential in driving a circular economy within the UK.

Deliver an intervention plan to guide long-term work on household food waste reduction behaviour change (by 2025)

While much progress has been achieved by local authorities in Scotland on food waste reduction, the current system still fails to capture a significant proportion of food waste from the household waste residual stream, and so there is quite evidently scope for significantly improving the status quo.

The proposed intervention plan to enable long-term work on behaviour change related to household food waste reduction would appear to offer a strong solution for addressing the limitations of the current system.

The Scottish Government's ambition, to work collaboratively with local authorities and householders to enable research and to better understand household recycling behaviour to affect a reduction in volume of food waste being placed in the residual

waste stream, is considered by ABC to be a constructive approach to the addressing the problem at the scale and pace required.

Develop with stakeholders the most effective way to implement mandatory reporting for food waste and surplus by businesses (by 2025/26)

Effective monitoring and management of food waste by the commercial sector is rightly recognised by Scottish Government as currently quite limited and voluntary in scope. Mandatory reporting of food waste and surplus by businesses would close the gap. The Scottish Government recognises the need to work with stakeholders including the business sector and the environment regulator SEPA to develop a robust system of mandatory public reporting that does not unfairly disadvantage smaller organisations and links with other policy developments including Digital Waste Tracking.

Support the development of regional Scottish hubs and networks for the reuse of construction materials and assets (from 2025/26)

While ABC supports repurposing construction materials and assets, we do not endorse the notion that local authorities should be responsible for implementing these plans. Household Waste Recycling Centres (HWRCs) are outdated and are facing increasing capacity constraints due to the growing demand for heightened separation and segregation. This is compounded by stricter regulations governing the storage and disposal of Persistent Organic Pollutants (POPs) materials, disposable vapes, batteries, NOx, bulky and small Waste Electrical and Electronic Equipment (WEEE), among others.

Considering these challenges, the industries responsible for producing these materials should take a leading role in providing both the necessary spaces and funding to bring the aspirations of the waste route map to fruition.

2. To what extent do you agree with the further actions to 2030 listed across the Reduce and Reuse strategic aim?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

Please provide evidence to support your answer if possible.

Deliver a prioritised approach to the introduction of environmental charges for problematic products (by 2025/26)

ABC supports the Scottish Government's plan to implement a prioritised approach to introducing environmental charges for problematic products. This endorsement aligns with ABC's belief that businesses should not be able to dispose of unsold

goods and that single-use products should be disincentivized by making them the more expensive, undesirable choice and offering a viable more environmentally preferable option. ABC would like to reiterate the necessity of addressing overproduction and the resulting overconsumption of raw materials within the framework of a circular economy strategy.

Introduce a charge for single-use disposable cups (by 2025)

ABC endorses the proposal for Scotland to introduce a charge for single-use disposable cups by 2025. This alignment is supported by compelling reasons, including that an estimated 4,566.6 tonnes of single-use cups and 583.1 tonnes of plastic lids are placed on the market annually. ABC anticipates that implementing a charge for single-use cups would contribute to a significant reduction in their sales, as well as other disposable items. Such a decrease in demand is expected to result in a long-term reduction in the need for raw materials, such as timber felling, to produce fibre for cups and other related materials.

Review the feasibility of setting reuse targets (from 2025)

The feasibility of setting reuse targets from 2025 is a critical consideration that warrants careful examination. Individuals and community groups often lead efforts around reuse, and occasionally through national initiatives like online reuse forums such as Freegle or FreeCycle. While local authorities currently participate in some reuse activities, they are not optimally positioned to implement the types of schemes proven to be effective. Instead, they function better as facilitators and supporters of community-driven initiatives by signposting residents.

It is crucial to approach the establishment of reuse targets with caution, ensuring that they do not impose impractical obligations or duties on councils that exceed their capacity to deliver. ABC underscores the need for a strategic shift in responsibility from local authorities to producers. Placing reuse targets on local authorities could necessitate a significant infrastructure expansion, impacting Household Waste Recycling Centres (HWRCs) and bulky waste collections.

ABC contends that the impetus for driving reuse initiatives should be directed towards producers. The understanding here is that producers, as the originators of waste, are responsible for enhancing the reusability or reparability of items. ABC emphasises that imposing reuse targets on local authorities could lead to challenges, including operational scale and infrastructure requirements, particularly in peripheral areas like Island communities in Scotland. These challenges may hinder the ability of local authorities to facilitate increased levels of reuse effectively and ultimately fall short of any targets set.

Develop restrictions on the destruction of unsold consumer goods (from 2024)

ABC strongly advocates for the development of restrictions on the destruction of unsold consumer goods from 2024.

ABC firmly believes that businesses should not have the right to dispose of unsold goods. This stance underscores the need to address overproduction and the subsequent overconsumption of raw materials, highlighting the importance of aligning such efforts within the broader context of a circular economy strategy.

The rationale behind ABC's support for restrictions on the destruction of unsold goods lies in its potential benefits to the circular economy. Implementation of these restrictions is anticipated to lead to surplus stock being redirected through avenues

such as sales, donations, or recycling. This, in turn, is expected to diminish the demand for new products while increasing the availability of used components for remanufacturing.

In addition to these restrictions, ABC envisions the development of targeted strategies and support initiatives. These initiatives will aim to foster increased reuse among consumers, with the overarching goal of reducing the demand for new products. This will significantly contribute to a decline in material consumption and a corresponding decrease in the extraction of virgin materials, promoting a more sustainable and circular approach to consumption and resource management.

Develop measures to improve the reuse experience for consumers (ongoing)

ABC supports the ongoing development of measures to enhance consumers' reuse experience. However, ABC seeks clarification on how repair initiatives and the "right to repair" principles will be fully realised in Scotland. UK regulations for the right to repair only extend to professional repair initiatives. Zero Waste Scotland has highlighted reuse and repair business models to boost the product and component reuse rate, fostering demand within the supply chain and among consumers. Two of these models are incentivised return and asset management. ABC acknowledges these models as valuable components of a comprehensive strategy to encourage reuse.

ABC underscores the importance of making right-to-repair regulations more consumer-focused and transparent. One practical approach could involve implementing eco-labelling practices specifically addressing durability and repairability. By incorporating eco-labels, consumers gain transparent information about a product's longevity and ease of repair, empowering them to make informed and sustainable choices.

Deliver behaviour change-based approaches focused on sustainable consumption, aligned to Let's Do Net Zero communications (ongoing)

ABC strongly supports implementing a behaviour change-based approach that focuses on sustainable consumption, aligned with the ongoing Let's Do Net Zero communications initiative. ABC believe that achieving a circular economy is intricately linked to robust and widespread communication strategies that effectively reach every segment of society.

Scottish councils must be provided with the necessary tools to communicate transformative changes to residents. Furthermore, ABC urges the government to consider the importance of national and local communication efforts, acknowledging the diverse demographics and geographical variations across Scotland. A tailored and inclusive communication strategy is crucial to ensure that the goals of a circular economy are comprehensively understood and embraced at every level of society.

Identify ways to expand business models that prolong product lifespan (ongoing)

ABC stresses the need for supportive policies to drive businesses toward adopting and expanding models that prolong product lifespan, fostering sustainability and a circular economy. Incentives and, when necessary, mandates should be implemented, requiring collaboration with government bodies and industry associations to shape a regulatory environment promoting these practices.

2 Modernise recycling

Recycling helps to conserve our natural resources, keep valuable materials flowing through our economy and reduce the amount of waste sent to landfill. We want Scotland to become a world-leader in recycling, where recycling and reuse services are easy to use and accessible to all, and support and encourage positive choices. By 2030, we want a high-performing recycling system that has modernised recycling services for households and businesses across Scotland, optimised the performance of collection services, and can recycle most waste types to maximise diversion of waste from disposal. Increasing the amount of materials recycled and increasing the proportion of these recycled in Scotland will deliver carbon reductions, reduce the environmental impacts associated with extracting new raw materials, and create a range of important economic opportunities to reprocess and reuse materials here in Scotland.

The objectives are grouped under:

- Modernise household recycling and reuse services, improving and optimising performance.
- Support businesses in Scotland to reduce waste and maximise recycling.

Read more on the Route Map.

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.

Priority Actions:

- **Facilitate a process to co-design high quality, high performing household recycling and reuse services with households, COSLA, local authorities and service operators. Timescale: Scoping work commenced in 2023; delivery of the co-design process will take place in 2024-25 and conclude in 2025-26.**
- **Review of compliance with commercial recycling requirements. Timescale: The review will commence in 2024, and report findings by the end of 2025.**
- **Co-design measures to improve commercial waste service provisions that drive waste prevention and reuse, and maximise recycling. Timescale: Preparation in 2025-26, co-design process in 2026-27.**

Part A: Modernise recycling

Recycling helps to conserve our natural resources, keep valuable materials flowing through our economy and reduce the amount of waste sent to landfill. We want Scotland to become a world-leader in recycling, where recycling and reuse services are easy to use and accessible to all, and support and encourage positive choices. By 2030, we want a high-performing recycling system that has modernised recycling services for households and businesses across Scotland, optimised the performance of collection services, and can recycle most waste types to maximise diversion of waste from disposal. Increasing the amount of materials recycled and increasing the proportion of these recycled in Scotland will deliver carbon reductions, reduce the

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The objectives are grouped under:

- Modernise household recycling and reuse services, improving and optimising performance.
- Support businesses in Scotland to reduce waste and maximise recycling.

Read more on the [Route Map](#).

Proposed actions

Objective 1: Modernise household and reuse services

Priority action:

- Facilitate a co-design process with Local Government for high quality, high performing household recycling and reuse services **(2024/25 and 2025/26)**

Further actions:

- Develop a statutory code of practice for household waste services **(by 2025/26)**
- Introduce statutory recycling and reuse local performance targets for household waste services **(from 2030)**
- Strengthen the Householder's duty of care in relation to waste **(by 2025/26)**
- Give local authorities more tools to support household recycling and reduce contamination **(by 2025/26)**
- Undertake a review of waste and recycling service charging **(by 2024/25)**
- Review the monitoring and reporting framework for local authority waste services **(by 2025/26)**
- Develop options and consult on the introduction of end destination public reporting of household recycling collected **(by 2027/28)**

Objective 2: Support businesses in Scotland to reduce waste and maximise recycling

Priority actions:

- Review of compliance with commercial recycling requirements **(2025)**
- Co-design measures to improve commercial waste service provisions **(2026/27)**

Further actions:

- Conduct a national compositional study of waste from commercial premises **(by 2025/26)**
- Investigate further steps to promote business-business reuse platforms **(by 2027)**

Questions

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.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

Please provide evidence to support your answer if possible

Facilitate a process to co-design high quality, high performing household recycling and reuse services with households, COSLA, local authorities and service operators. Timescale: Scoping work commenced in 2023; delivery of the co-design process will take place in 2024-25 and conclude in 2025-26.

ABC is concerned about the practicality of applying co-design principles to waste and recycling services. We fear that by extending the collaboration too far, negotiations may be removed from local government control during service changes. Control over decision-making and service improvements is necessary to prevent uninformed public decisions. After all, local authorities' officers are the experts in service provision, resources, and specific demography. ABC hopes that government are mindful of timelines when the Deposit Return Scheme (DRS) and other related policy changes will have an effect on the composition of waste.

Review of compliance with commercial recycling requirements. Timescale: The review will commence in 2024, and report findings by the end of 2025.

ABC supports a compliance review for commercial recycling. While a widely accessible recycling service can decrease litter and flytipping, optimise collection routes, and reduce landfills and incineration, changes for local authorities should be fully funded. Additional requirements, like increased collection from commercial premises, must be costed, and local authorities should be reimbursed for added expenses.

Co-design measures to improve commercial waste service provisions that drive waste prevention and reuse, and maximise recycling. Timescale: Preparation in 2025-26, co-design process in 2026-27.

ABC supports this endeavour and wants to see more onus placed on the producer to achieve these goals.

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.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Not answered

Please provide evidence to support your answer if possible

Develop a statutory code of practice for household waste services, with a focus on recycling and reuse.

ABC advocates for enhanced alignment of collection systems, particularly when mandated by new statutory obligations. Given the financial challenges local authorities have faced over the past decade, changes required by such obligations must be fully funded. Any additional requirements stemming from new statutory obligations must be thoroughly costed, with local authorities appropriately remunerated for increased costs.

Financial incentives for local authorities are crucial to effectively support statutory targets, considering ongoing financial pressures and budget cuts. As new statutory targets will necessitate legislative changes and impose additional legal burdens on councils, full funding from the Scottish Government is essential to enable compliance with any new duties.

Additionally, ABC emphasises the necessity for a structured and regular working group led by the Scottish Government to address gaps in waste-related initiatives. This working group should not just ensure coordinated efforts; it should be the cornerstone of the waste route map strategy, with action plans and clear timelines for effective implementation and visibility.

Introduce statutory recycling and reuse local performance targets for household waste services.

ABC is concerned about introducing statutory targets without clearly understanding necessary service adjustments. ABC sees a need for a nuanced approach in setting and comparing recycling targets, considering regional variations in waste management infrastructure and practices within Scotland rather than drawing comparisons to regions like Wales with different compositions, regulations, legislative drivers, and infrastructure. While the route map recognises the need for varied targets considering the diverse starting points of different councils, ABC is apprehensive that imposing financial penalties may exacerbate challenges for councils in the most struggling categories.

Strengthen Householder’s duty of care in relation to household waste: making a breach of the householder duty of care a criminal offence and creating a new fixed penalty regime to enforce this duty.

ABC supports the initiative to strengthen the householder's duty of care regarding household waste by considering breaches as criminal offences and introducing a new fixed penalty regime for enforcement. The current approach of intervening through education before recycling service removal may inadvertently lead residents to dispose of recycling improperly, which conflicts with the principles of a circular economy. ABC advocates for empowering local authorities with additional enforcement powers, similar to those available for fly-tipping offences, starting with Fixed Penalty Notices (FPNs) and escalating to court action if necessary. Striking a balanced and progressive approach is deemed essential to prevent an overload of court cases and garner increased public support for any enforcement actions.

However, while ABC supports the idea of increased powers for councils, there are valid concerns. Enforcing Fixed Penalty Notices (FPNs) in Scotland raises apprehensions about the feasibility of holding householders accountable through this method due to financial constraints and resource limitations for local authorities in implementing and enforcing such measures.

Give local authorities more tools to ensure that households are properly using their recycling containers and to reduce recycling contamination.

See the answer given above.

Undertake a review of waste and recycling service charging.

ABC endorses a comprehensive examination of direct charging for residual waste services, particularly for authorities considering this option. Implementing this approach may necessitate challenging policy changes. However, ABC views charging for residual waste as a progressive step towards enhancing recycling quality, incentivising overall waste reduction, and placing responsibility for conscientious consumption squarely on citizens.

Review the monitoring and reporting framework for local authority waste services and subsequently strengthen where necessary.

ABC supports a comprehensive review of the monitoring and reporting framework for local authority waste services by 2025/26. We underscore the importance of enhancing the framework as required, urging the government to prioritise user-friendly systems. Local authorities must be adequately resourced with data officers to streamline administrative processes. ABC agrees that conducting an up-to-date waste compositional analysis will inform the co-design of future recycling services and gain valuable insights into adding specific streams in any new framework.

Develop options and consult on the introduction of a requirement on local authorities and others to report publicly on end destination of household recycling collected.

ABC strongly endorses this initiative to engage citizens, rebuild trust in services, and encourage proper recycling service use. However, we urge caution to ensure this reporting task is manageable for already time-constrained officers.

Conduct a national compositional study of waste from commercial premises.

ABC acknowledges the crucial role of waste compositional analysis in addressing data gaps within commercial recycling and enhancing service provision. We are pleased to note that beyond 2026, the Scottish government intends to implement a continuous program of commercial waste analysis to assess the impacts of interventions. This is particularly significant considering the numerous policy changes expected to influence waste streams over the next six years.

Investigate further steps to promote business-business reuse platforms.

Regarding the feasibility of encouraging reuse and repair, ABC emphasises the necessity to shift responsibility from local authorities to producers. ABC advocates placing the impetus for driving reuse initiatives on producers, who have the potential to support and financially contribute to enhancing items' reusability or reparability. In Scotland, local authorities, particularly those in peripheral areas like Island communities, face challenges related to operational scale and infrastructure requirements, hindering their ability to facilitate more reuse. The underlying concern is that local authorities have limited influence over what is produced and the availability of outlets for materials. The responsibility lies with producers, distributors, businesses, and retailers.

3: Decarbonise disposal

The production and management of waste results in environmental impacts and represents missed economic opportunities for these materials. That is why our focus in this Route Map is to prevent materials from becoming waste in the first place. As we accelerate our move to a circular economy, we will produce less waste. We want to ensure that materials that cannot be avoided, reused or recycled are managed in a way that minimises environmental and climate impacts, encourages management of materials further up the waste hierarchy, and minimises broader societal impacts.

The objectives are to:

- Understand the best environmental outcomes for specific wastes
- Ensure there is an appropriate capacity to manage waste
- Improve environmental outcomes for waste through innovation
- Incentivise decarbonisation of the waste sector

Read more on the Route Map.

Part A: Decarbonise disposal

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- Understand the best environmental outcomes for specific wastes
- Ensure there is an appropriate capacity to manage waste
- Improve environmental outcomes for waste through innovation
- Incentivise decarbonisation of the waste sector

Read more on the [Route Map](#).

Proposed actions

Priority actions:

- Develop and deliver a Residual Waste Plan to 2045 (develop by 2025/26)
- Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26)

Further actions:

- Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal (from 2028)
- Review and target materials currently landfilled to identify and drive alternative management routes (from 2024)
- Facilitate the co-production of guidelines for effective community engagement (process underway from 2024)
- Increase the capture of landfill gas (by 2025)

Questions

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.

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly Disagree Not answered

Please provide evidence to support your answer if possible

Priority Actions:

Develop and deliver a Residual Waste Plan to ensure the best environmental outcome for unavoidable and unrecyclable waste and set strategic direction for management of residual waste to 2045. Timescale: Research and engagement during 2023-2024 and 2024-25. Publication in 2025-26.

ABC supports the Residual Waste Plan to ensure optimal environmental outcomes for unavoidable waste and establish a strategic direction for residual waste management until 2045. However, we have some concerns:

Cost of ETS: We are wary of the potential substantial cost of the Emissions Trading Scheme (ETS), estimated at approximately £50 to £70 per tonne.

Influence on carbon reduction: There are concerns about local authorities' capacity to influence carbon reduction in the energy-from-waste sector, particularly without a dedicated residual waste plan.

Challenges for Islands: Islands face specific challenges, including ferry capacity issues and the feasibility of reviewing target materials destined for landfill.

Energy-from-waste (EfW) considerations: The route map's focus on managing waste may overlook the dual nature of EfW for Shetland, where it is as much an energy matter as a waste one. EfW is crucial for heating over 1,000 properties, addressing fuel poverty in an area with higher energy costs compared to the mainland.

Citizen behaviour: Local councils' limited ability to influence citizens to use waste services correctly raises concerns. Addressing this challenge is crucial for the success of any waste management plan.

Infrastructure investment: ABC seeks clarification on how the government plans to incentivise investment in essential infrastructure such as 'dirty MRFs'.

Need for clarity and action plans: ABC wants more clarity, detailed action plans, and visible timelines within the Residual Waste Plan.

Inclusive representation in Advisory Panel: ABC requests diverse representation from across Scotland to be included in the Residual Waste Advisory Panel. This ensures that all demographics are considered in any actions resulting from the panel's recommendations.

Facilitate the development of a Sector-Led Plan to minimise the Carbon Impacts of the Energy from Waste Sector. Timescale: Research and engagement during 2023-2024 and 2024-25. Publication in 2025-26.

ABC acknowledges the necessity for waste industry ownership in steering the development of the required infrastructure for handling materials. This sector-led approach is crucial for guaranteeing economic viability and environmental sustainability within the plan. Imposing a mandate becomes instrumental in compelling the necessary expansion and fostering innovation in the sector.

However, this initiative must be seamlessly integrated, effectively removing materials from households and commercial premises. There remains a significant incentive for the government to strategically deploy levers such as reducing residual capacity and frequency availability or implementing direct charges for residual waste services. These measures play a pivotal role in shaping behaviours and promoting responsible waste management practices, aligning with the plan's overall success.

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.

Strongly Agree Agree Neither agree nor disagree Disagree
 Strongly disagree Not answered

Please provide evidence to support your answer if possible

Further Actions:

Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal.

Supporting the inclusion of energy from waste (EfW) in the UK Emissions Trading Scheme (ETS) and exploring other fiscal measures to incentivise low-carbon disposal may pose several challenges for local authorities:

Financial implications: Local authorities may face increased costs associated with complying with the ETS. Implementing low-carbon disposal methods could require investment in new technologies or infrastructure, and this is at a time when local authorities are more stretched than ever before.

Technology Adoption: Implementing low-carbon disposal methods, especially if reliant on new technologies, may require local authorities to invest in and adopt unfamiliar systems. This presents an opportunity for growth and development, empowering local authorities to lead in the transition to a low-carbon economy. Still, ABC is concerned about where the funding to make this transition will come from.

Data and reporting requirements: Compliance with the ETS or other fiscal measures might necessitate enhanced data collection and reporting. Local authorities may need to invest in systems to meet these requirements.

Interactions with existing waste contracts: The proposed changes may require renegotiating or adjusting existing waste contracts. This could entail legal complexities and potential disputes, as well as the possibility of falling short of targets due to delayed implementation.

Review and target materials currently landfilled to identify and drive alternative management routes.

ABC appreciates the chance to contribute to a call for evidence in 2024.

Facilitate the co-production of guidelines for effective community engagement.

ABC endorses the development of meaningful and effective community engagement guidance. Collaborating with community groups, local authorities, and residual waste operators should ensure that the advice is practical and beneficial for all stakeholders.

Increase the capture of landfill gas.

ABC supports this.

4: Strengthen the circular economy

Delivering a circular economy is not a simple task. It requires sustained transformational system change, and a range of actions that are both complementary and coordinated to drive sustainable management of our resources. If Team Scotland are to maximise the opportunities that a circular economy brings to Scotland, we must maintain a strategic approach to its delivery, ensuring the right structures and support are in place to enable action across the circular economy.

The objectives are to:

- Provide strategic oversight and direction for the delivery of a circular economy in Scotland.
- Coordinate action across cross-cutting areas to support progress across the waste hierarchy.
- Robustly monitor and evaluate progress to enable agile working, take action where we are not on track, and learn from and implement what works.

Read more on the Route Map.

Part A: Strengthen the circular economy

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Proposed actions

Priority actions:

- Develop a Circular Economy strategy every five years (from 2025)
- Set new circular economy targets (determined from 2025)

Further actions:

- Review and refresh Scotland's Waste Data Strategy's action plan (development alongside new circular economy targets)
- Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities (ongoing)
- Develop public procurement opportunities to reduce the environmental impact of public spending, including scoping new legislative circular economy

requirements for contracting authorities under section 82 and 82A of the Climate Change (Scotland) Act 2009 (ongoing)

- Support greater uptake of green skills, training and development opportunities (ongoing)

Questions

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.

- Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Not answered

Please provide evidence to support your answer if possible

Develop a Circular Economy strategy every five years. Timescale: Update or refresh every five years, with the first strategy set from 2025.

ABC believes that including a five-year strategic plan into the Circular Economy bill requirements is a proactive measure to steer Scotland towards achieving milestones. This approach ensures flexibility for adjustments and adaptations based on evolving policies.

ABC highlights the intricate challenges in transitioning waste management to net zero and underscores the need for a comprehensive strategy beyond the scope of local authorities. Throughout our discussions in this response, we have stressed the significance of public engagement, participation, and a nuanced understanding of diverse community needs. Resource constraints, technological infrastructure requirements, logistical challenges, and the vital need for robust compliance monitoring. The most crucial point raised is the potential financial burden on local authorities, considering variations in their capabilities. ABC advocates for a collaborative effort involving all stakeholders to co-design measures to improve waste management services, including producers and residents. This holistic approach is necessary for the successful and sustainable implementation of waste management initiatives, and we strongly urge the Scottish Government to carefully consider these factors in future strategies. ABC would like to understand better what proactive measures are planned to ensure a just transition. Anticipated changes for all stakeholders may increase goods, services, and waste handling costs. What measures are proposed to shield the public, local authorities, and others from inflated pricing throughout the proposed changes?

Setting new circular economy targets beyond 2025. Timescale: Research underway across 2023-2024, with new targets to be consulted on, and determined from 2025.

ABC welcomes the initiative to set new circular economy targets beyond 2025, particularly ones that move away from weight-based metrics towards considering factors like carbon emissions. This shift allows for a more comprehensive understanding of the actual costs associated with material use and disposal. However, ABC underscores the importance of extending these targets to include producers and manufacturers. Implementing Extended Producer Responsibility (EPR) for more materials beyond the current scope of products could serve as a

viable solution, compelling producers to take accountability for the entire lifecycle of their products. Additionally, if we're moving away from weight-based assessments, we must address how local authorities will measure and document data regarding materials. Developing new methodologies and frameworks will be essential in this transition.

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.

Strongly agree Agree Neither agree nor disagree Disagree
 Strongly disagree Not answered

Please provide evidence to support your answer if possible

Further Actions to 2030:

Review and refresh Scotland's Waste Data Strategy's action plan.

ABC welcomes this review.

Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities.

ABC welcomes the spirit of collaboration and the level of ambition set out in the route map and agrees that behaviour change is a crucial element that should underpin all elements of the circular economy strategy and priorities.

Develop public procurement opportunities to reduce the environmental impact of public spending, including scoping new legislative circular economy requirements for contracting authorities under section 82 and 82A of the Climate Change (Scotland) Act 2009.

ABC embraces the prospect of more sustainable procurement processes for Scottish authorities and recognises the dual benefits of environmental responsibility and cost savings. Drawing inspiration from recent policies in England, mainly concerning local authorities mandated to establish food waste collections, Scotland can glean valuable insights. While industry and markets were forewarned about the impending procurement demands, ABC anticipates potential challenges such as price increases, bottlenecks, and prolonged waiting times for essential equipment, stemming from numerous authorities' simultaneous efforts to implement similar services.

Support greater uptake of green skills, training, and development opportunities.

ABC advocates for a more robust promotion of green skills, training, and development opportunities. Considering that 2050 is 26 years away, it is imperative to implement plans targeting the younger generation, beginning at the primary school level. As many individuals working in the sector now may retire before 2050, proactive measures must be taken to engage and educate the youth. In this context, it is crucial to address the development of courses and training programs. What

strategies will be employed to ensure the creation of relevant educational content? Educational providers need support integrating Circular Economy (CE) concepts into the curriculum.

Additionally, the notion of a dedicated CE in schools' officer, supported by appropriate funding, could play a pivotal role in increasing interest in our sector.

Part B: Impact assessments

We are committed to assessing the impact of proposals. Alongside this draft Route Map we have published updated assessments of the potential impacts on equality, socio-economic considerations, island communities, business and regulation, and the environment. This is in accordance with our legislative requirements and, importantly, to inform the final policy development process.

Review the [Route Map impact assessments](#).

9 . Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment.

Add text to provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment

The council has an Equalities Impact Assessment guidance and supporting template to reference, see: [Equality and Socio-Economic Impact Assessment \(EqSEIA\) | The Hub \(argyll-bute.gov.uk\)](#) This allows for assessing how the strategic aims of Route Map interventions of 'reduce and reuse, modernise recycling, decarbonise disposal and strengthen the circular economy' actually impact service users with protected characteristics.

10 . Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment.

Add text to provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment

If any of the work will result in providing grant funding to employers/organisations from the council, received from the Scottish Government, then consideration should be given to the Fair Work First conditionality, see: [Fair Work First Criteria: What It Means In Practice - Fair Work First guidance - gov.scot \(www.gov.scot\)](#)

Through this approach the Scottish Government is supporting employers who adopt fair working practices, specifically:

- payment of at least the real Living Wage;
- provide appropriate channels for effective workers' voice, such as trade union recognition;
- investment in workforce development;
- no inappropriate use of zero hours contracts;

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- action to tackle the gender pay gap and create a more diverse and inclusive workplace;
- offer flexible and family friendly working practices for all workers from day one of employment; and,
- oppose the use of fire and rehire practice.

The Fair Work First criteria seek to address particular challenges in Scotland's labour market, to make a real difference to people and their communities, business and other organisations and the economy.

11 . Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment.

Add text to provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment

Agree with an island impact assessment inclusive of revenue and capital cost implications.

12. Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment.

Add text to provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment.

Part B: Strategic Environmental Assessment

The Environmental Assessment (Scotland) Act 2005 requires those plans, programmes and strategies that are likely to have a significant impact on the environment to be assessed and measures to avoid, prevent or reduce adverse effects are sought, where possible, prior to implementation.

Alongside the draft Route Map, we have published a [Strategic Environmental Report](#), which contains further information on the SEA process and the findings on the likely environmental implications arising from the measures set out within the Route Map.

Review the [SEA Report](#).

Questions

13. What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

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Add text to share your views on the accuracy and scope of the environmental baseline set out in the environmental report

14 . What are your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the environmental report? Please give details of any additional relevant sources.

Add text to share your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the environmental report

15 . What are your views regarding potential reasonable alternatives, in reference to the approach set out in the environmental report?

Add text to share your views regarding potential reasonable alternatives, in reference to the approach set out in the environmental report

16 . What are your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Add text to share your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the environmental report

About you

Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will still take account of your views in our analysis but we will not publish your response, quote anything that you have said or list your name. We will regard your response as confidential, and we will treat it accordingly.

To find out how we handle your personal data, please see our [privacy policy](#). By clicking submit you agree to our privacy policy.

What is your name?

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Name

Are you responding as an individual or an organisation?

(Required) Individual Organisation

What is your organisation?

If responding on behalf of an organisation, please enter the organisation's name here.

If you are responding as an individual you can leave this blank.

Organisation

Further information about your organisation's response

Organisations may use this space to provide additional context for their response. This could be information about, for example:

- any research your organisation undertook to inform the response
- any engagement with your members or audience undertaken to inform the response

This is optional.

Please add any additional context

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

(Required) Publish response with name Publish response only (without name) Do not publish response

Information for organisations only:

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The option '*Publish response only (without name)*' refers only to your name, not your organisation's name. If this option is selected, the organisation name will still be published.

If you choose the option '*Do not publish response*', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

(Required) Yes No

What is your email address?

If you would like to be contacted again in future about this consultation please enter your email address here. You will also need to give permission to be contacted in the question above.

Your email address will never be published.

Email

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

[Privacy Policy](#)

(Required) I consent