

Response ID ANON-EPBD-HXN8-1

Submitted to Delivering Scotland's circular economy: A Route Map to 2025 and beyond
Submitted on 2022-08-22 17:26:56

Package 1: Promote responsible consumption, production and re-use

1 To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use?

Agree

Supporting evidence:

The REA fully support the waste hierarchy and measures to drive materials up the hierarchy. Changing behaviour with regard to material consumption is difficult and there needs to be adequate funding in place for on-going and sustained communication over many years. It is important that there is sufficient funding provided for this. It should be ensured that any income from proposed environmental charges is ring fenced and used for further education, communication and behaviour change activities.

We support the aim to increase sustainable product choices and this needs to also include recycled products such as compost and digestates. We need to ensure that a holistic approach is taken where there is a system in place to divert organic waste to composting and anaerobic digestion but also that there is encouragement and incentives for these materials produced by these facilities to be used over the use of soil improvers and fertilisers derived from finite resources. This should include requirements for local authorities to 'take back' recycled materials such as compost where they can be a suitable replacement for virgin materials that the council consume, for example for maintaining the council's parks and gardens. This would also have the benefit of raising the importance of ensuring quality feedstocks are supplied to organics recycling sites, if the Local Authority are also using the outputs. There need to be improvements in the labelling of these materials to help consumers make informed choices.

Given the loss of the EU's Basic Farm Payment and its replacement to be based on sustainability, compost will become an increasing valuable asset to agriculture above its current remit. The fertiliser and energy crisis has reduced farmers ability to afford artificially produced products therefore the nutrients provided by compost and digestate become a valuable farm addition.

With regards to single use cups, we highlight that independently certified compostable cold drinks cups and hot drinks cups and lids are available and in use, mainly in closed loop scenarios where they are co-collected with food waste and sent to composting facilities. They are amongst the compostable packaging and non-packaging product forms the Animal and Plant Health Agency, Environment Agency and Scottish Environment Protection Agency have allowed to be composted in facilities that do not have APHA approval under animal by-products regulations (see <http://www.organics-recycling.org.uk/page.php?article=3466>). This position significantly increases the number of composting facilities which could receive and biodegrade with food waste items such as compostable cold and hot drinks cups and lids, subject to those facilities having suitable waste codes and descriptions in their permits to operate.

The REA believes that independently certified compostable cutlery (forks, knives, spoons, chopsticks), plates, trays, platters, bowls, straws, other tableware and food containers should be exempt from any ban or future charge. These items are available and in use, mainly in closed loop scenarios where they are co-collected with food waste and sent to composting facilities. They are particularly useful in contexts where it is not possible to use washable and re-usable products, e.g. at events venues where the washing and storage capacity for re-usable tableware is less than would be needed given the number of people attending the event.

We already have co-collection of used compostable products of these types with food waste from closed loop sources, e.g. restaurants, cafes, offices, canteens, and events spaces in Scotland. According to Vegware, their subsequent composting has been trialled in at least 23 In-Vessel Composting facilities and one suitably equipped wet-AD facility in the UK, and they were being composted/digested at approximately 9 facilities on a regular basis in 2019. In 2020 Vegware had 68 client sites signed up with to their collection service [called] 'Close the Loop' in the following locations: Edinburgh, Glasgow, St Andrews, Dundee, East Lothian, Oban, Perth, Leven and Livingston.

2 Are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and re-use?

Further measures to include:

It should be ensured that any income from proposed environmental charges is ring fenced and used for further education, communication and behaviour change activities.

Package 1 could include further actions on biowastes (particularly food waste) for example: measures to increase consumer awareness (only buy what you need) could be mirrored by optimised selling practices (no BOGOFs for short shelf life foods). Increasing the likelihood of consumers making sustainable choices is important but there is merit in looking into how consumers could only be offered sustainable choices as they (we) will tend to make decisions solely on price, irrespective of other values.

We would also support the introduction of open access sustainability tools, i.e. tools that allow Scottish Government or other stakeholders to determine whether a product or practice meets a pre-defined threshold for 'sustainability'. These would underpin some of the suggested proposals and could be used by anyone to inform sustainability calculations – and hence, investment decisions – making sustainability transparent to all.

Package 2: Reduce food waste

3 To what extent do you agree with the measures proposed in this package to reduce food waste?

Agree

Supporting evidence:

The REA support proposals to introduce mandatory reporting of food surplus and waste. Reporting this will allow businesses to have increased visibility of the food that is being wasted and then be able to make informed decisions about how they can deal with the food waste in line with the waste hierarchy, i.e. minimise the amount they generate, re-use it where possible and finally send unavoidable food waste to organic recycling.

The REA would welcome contributing on behalf of our members to further investigations on food waste action plans.

We fully support the development of a behaviour change strategy and this should be informed by existing research alongside new research. Previous studies have shown the importance of on-going well-designed communications to achieve the desired results, i.e. increased participation. This study of food waste collections in Ireland looked at the effectiveness of different communications and the source of the messaging and the impact this had on householder participation in food waste recycling.

<https://www.mywaste.ie/report-on-the-food-waste-recycling-pilot-project/>

As before, it is imperative that any behaviour change campaign is properly funded to maximise the impact.

The proposals to engage with Scottish businesses and organisations to reduce food waste and engage with the circular bioeconomy must take a whole system approach and also include the legal requirement for these businesses and organisations to have a food waste collection. This needs to be backed up by effective enforcement of the existing regulations.

We are aware that many businesses are already engaged in a range of activities which help to reduce food waste in their business operations. This includes understanding the amounts and types of food waste they generate, building relationships with, and using local suppliers, working with seasonal ingredients, and the re-distribution of surplus food, to food banks, and via other mechanisms such as the Too Good to Go app. Case studies and publication of these good examples could help to encourage and incentivize those businesses who have not yet engaged with food waste reduction.

4 Are there any further measures that you would like to see included in the Route Map to reduce food waste?

Further measures to include::

The Waste (Scotland) Regulations 2012 require that all waste producers take reasonable steps to present key dry recyclables for separate collection. The regulations also require some food businesses to segregate food waste for separate collection. As a reflection of this pending legislation, commercial businesses invested in facilities to manage the increase in volumes advised. However, with regard to food waste, there were limited resources, to communicate, train or implement the changes required. This combined with the lack of enforcement exaggerated the lack of compliance. This was especially evident in the requirement for separate collection of greater than 5kg per week food waste production. The investment in facilities to meet the requirements of the new regulation, was in the main, built above capacity. To avoid similar, businesses would require some reassurance that resources for implementation and enforcement of compliance would be in place to ensure that any legislation is complied with prior to further capital investment.

The current system of informing is not sufficient to drive compliance. The impact of Covid-19 pandemic and the lockdown of the hospitality sector has also impacted this and members have reported widespread non-compliance with the legislation with regard to food waste collections. The REA are supportive of the food waste reduction activities but strongly feel that any actions taken to reduce food waste and to move food waste up the waste hierarchy must be underpinned by adequate resources to enforce the legislation.

Package 3: Improve recycling from households

5 To what extent do you agree with the measures proposed in this package to improve recycling from households?

Agree

Supporting evidence:

The REA support the proposals to design high performing collections and to promote best practice. Quality of the collected materials must be central to this, along with participation. Poor quality waste streams can result in more material being rejected from the treatment facility, increased processing costs, poorer quality outputs which lead to reduced market value and acceptance. Often the full impact of quality is not considered (such as increased costs for incineration or landfill, increased CO2 emissions, reduced amounts of outputs available for use) and this must be when designing the high performing collections.

There needs to be close co-operation between the local authorities and the re-processing / recycling industry to ensure that efforts are focussed on target material. Too often there has been gaps with what householder are told to recycle and what the sector can actually deal with.

Proper funding for effective education and communication is the single biggest factor that will increase the recycling of food and garden waste and improve the quality of materials collected. It is essential that this is delivered on an on-going basis and not just at the roll-out of service to ensure long-term awareness of the materials that are accepted. Provision of generic information to Local Authorities who can then adapt this to their circumstances has been successful for other waste streams through the WRAP Recycle now communication toolkit and Zero Waste Scotland's Recycle for Scotland programme.

The REA support the proposals to consult on the requirement to collect garden waste. Separate garden waste collections (i.e. separate from food waste) may be appropriate in some areas but this must not be the only option. We are aware of examples where co-mingled food and garden waste collections

result in comparable tonnages to the estimated tonnage from separate garden and separate food waste collections. Co-mingled collections are processed mostly by composting sites (although dry-AD also a suitable treatment technology). The resulting compost is used as a source of nutrient and organic matter for soils. The improvement in soil organic matter and structure improves the soils' ability to hold carbon, which aligns with the requirement for carbon capture. Co-mingled collections can also reduce transportation and staff costs associated with separate collection. We are aware that some local authorities have moved from separate food and garden waste collections to co-mingled collections based on best value (North Lanarkshire, Stirling and West Lothian). In other circumstances, depending on existing infrastructure, separate food and garden waste collection may be more appropriate. High recycling performance and achieving the overall policy objective of diverting food and garden waste from the residual bin should be the priority, leaving the collection approach to be decided by the individual local authorities.

The REA support the proposals to require LAs to report publicly on the end destination of household recycling. This will help increase public confidence and participation in the services. A recent study by INCPEN (<https://incpen.org/lack-of-information-on-what-happens-to-recyclates-after-collection-risks-undermining-public-confidence-in-recycling/>) identified provision of information on what happens to recycling after collection as the top positive influence on public confidence in recycling at home in Wales. There is a need to make this more visible to the householders so they realise the impact of their actions.

In Italy there is a strong focus on providing information to householders about what happens to their organic waste which helps both with householder participation but also to convey the importance of quality. This is information provided by the municipality and waste treatment provider. They share reliable information about their process, and have a lot of easy to understand graphics, such as:

- 130kg of food waste can produce enough biomethane for a 100km journey
- 1 tonne of food waste can produce 200kg compost, 500 litres of clean water and 160m³ biogas which either produce 400kW electricity and 400kW heat or 90kg of biomethane (1,800 km) and 64kg of carbon dioxide.
- A family producing 550kg of organic waste can produce 100kg of compost and 45kg of biomethane, for a 900km family road trip.

REA welcome the review of the rural exemption for food waste collections. We feel this is particularly important for commercial food waste collections. Members report that there are businesses in many area who both produce significant amounts of food waste and could access a food waste collection service (for example a truck that is passing close by to service non-exempt businesses) but due to the rural area exemption, are opting to continue to dispose of their food waste with their residual waste. This is a missed opportunity.

With regard to the proposals to develop statutory guidance, it is important that this includes requirements on the quality of materials collected to enable these to be beneficially recycled to long term sustainable markets. Further details included in our answer to question 6.

The REA supports the proposals to introduce statutory recycling targets. We are aware that in other countries this approach has worked well to support investment in infrastructure to treat the materials. Food and garden waste is a large proportion of the total waste generated and we have a good network of existing facilities in Scotland enabling this material to be treated in line with the proximity principle. Reaching targets for recycling will be impossible without high performing food and garden waste collections. As mentioned in our answer to question 6 below, recycling targets should also include a target for the amount of food and garden waste that can remain in the residual bin to help drive high performing collections.

Regarding the proposals to investigate waste and recycling charges, we welcome the opportunity to look at this. We are aware in other countries such as Italy, the polluter pays principle is applied. The cost of waste (collection and treatment) is charged directly to the householder and this enables greater visibility of the whole system costs and also can influence householder behaviour, i.e. it costs less if they recycle more. It also enables Local Authorities to understand their full costs of providing the service and drives efficiencies. The future investigation needs to consider examples from elsewhere and engaging feedback across the waste and resources sector.

6 Are there any further measures that you would like to see included in the Route Map to improve recycling from households and incentivise positive behaviours?

Further measures to include:

In order to drive biowaste recycling (i.e. treating food or plant waste through composting and / or anaerobic digestion) and ensure we have high performing collections, there should be a target for the amount of biowaste / organic waste that can remain in residual waste. Compositional analysis will need to be undertaken by Local Authorities to enable them to report against the targets and measure the success of their collections. This should be reported and published on an annual basis and will aid in evaluation of collection and communication tools, and enable changes to be made. These targets could adopt a phased approach tied to the implementation dates, a suggestion is:

- Less than 50% of food waste by weight in the residual bin 2 years after the implementation of high-performing collections
- Less than 30% of food waste by weight in the residual bin 4 years after the implementation of high-performing collections
- Less than 20% of food waste by weight in the residual bin 6 years after the implementation of high-performing collections

This will drive the waste up the waste hierarchy and ensure we have high performing collections and can maximise the production of quality organics for beneficial use in land- and growing-media-based applications.

Quality of feedstocks is an ongoing challenge for the organics recycling industry. Currently the controls are on the outputs from our members facilities, through meeting industry standards, PAS100 and PAS110. Local authorities require sites to comply with these standards as part of the tendering process but there are no standard requirements on the quality of feedstocks that LAs can provide to sites – this should be included within statutory guidance. For example, a typical allowable contamination limit for garden waste is 5%, and to produce a compost that meets SEPA's end of waste position, compost must contain less than 0.06% plastic. The operational work and cost to achieve this is borne by the compost site operator. Our members would like to see a lowering of allowable contamination levels within LA contracts supplying compost and AD plants so that they can produce high quality outputs which have beneficial end uses in sustainable markets. The pressure should not come from the constraints set by SEPA end of waste positions, there should

also be up stream pressure on LA's to provide cleaner waste streams for commercial operations to process. Appropriate provisions in waste supply and treatment contracts and at-waste-source measures that reduce contamination by non-compostable plastics are important. SEPA's study said that 'feedstock with 5 %, or even 1 %, of contamination requires significant clean-up if the final compost is to achieve either PAS 100 or the new [the current SEPA] regulatory limits' and '...achieving such reduction levels [at composting facilities] is extremely difficult.

Caddy liners

REA call for Local Authorities to be funded to provide caddy liners for food waste collections to householders. It is well known that supplying liners for kitchen food waste caddies and kerbside food waste bins increases the amount of food waste that is separately collected, diverting more of it from residual waste bins. Householder surveys carried out as part of WRAP food waste collections trials in 2008 - 2009 suggested that participation would be significantly affected if supplies of free liners were removed, and residents were then required to purchase liners from retail outlets. Building on this, more recent WRAP research on barriers to participation found that households without an ongoing or adequate liner supply tended to stop participating with subsequent difficulties in re-recruiting these households onto the scheme later.

WRAP's summary document (Household food waste collection guide, <https://wrap.org.uk/resources/guide/household-food-waste-collections-guide>) also highlights that 'providing householders with a combination of well-designed internal and external containers plus a supply of caddy liners supported by quality communication materials can help ensure good engagement and good participation and capture rates'.

Government, regulators and industry are seeking ways to reduce the amount of visible plastics and microplastics that reach soils via waste-derived composts and digestates. In addition, the biowaste recycling and recovery sector is committed to producing digestates and composts of the highest possible quality and to manage food wastes as efficiently as possible. In order to maximise biowaste recycling, minimise any potential impact on the environment and reduce the millions of pounds the UK's organics recovery and recycling industry spends annually on removing and sending incompatible plastics and other contaminants to waste recovery or disposal facilities, the REA and contributing organisations have developed a policy on liners and re-purposed bags (see <https://www.r-e-a.net/resources/policy-on-and-liners-and-re-purposed-bags/>). This policy covers liners and re-purposed bags suitable for separately collecting food waste (non-packaged and user-unpackaged) from households, businesses and non-domestic premises, in England from 2023 onwards but could equally apply to Scotland too.

Criterion 1 from REA liners and re-purposed bags policy (full criteria set and details separately available):

1. Non-packaged and user-unpackaged food that is discarded and separately collected - including where co-collected with plant waste - must be presented:

- a. in plastic or paper liners or re-purposed bags (inside the caddy/bin) independently certified compliant with BS EN 13432 or BS EN 14995*;
- b. in a user-made caddy/bin lining made of a re-purposed paper, non-bag / non-liner item, e.g., newspaper; or
- c. loose inside the bin (also referred to as naked), as the least preferred but still acceptable option if the bin user or organisation responsible for such bins so chooses.

* The liners or re-purposed bags must have a valid certificate of conformance to BS EN 13432 or BS EN 14995, issued by an independent certification body. The latter standard mirrors EN 13432, its scope being for plastics rather than packaging, which is the scope of the former standard. (Liners are not currently classified as packaging whereas bags are.) Both standards include disintegration and biodegradation criteria for item biodegradation under industrial scale composting conditions as well as under AD followed by composting conditions, although item testing for conformance to the latter specific criteria has tended not to be pursued to date. Paper bags / liners must have a valid certificate because they often have glued seals and printed on ink(s) which need to be checked for their compostability.

Our policy facilitates higher quality and higher yields of composts and digestates produced from organic recycling and recovery of separately collected biodegradable wastes, and reduced risk of pollution when the composts and digestates are spread on land.

Compostable liners have been shown to lead to reduced levels of contamination by non-compostable plastics*. This can help to avoid the financial costs of removing and sending front-end removed liners/re-purposed bags to recovery (e.g., energy from waste) or landfill facilities and the associated negative impacts on the environment. It will also enable the compostable bags/liners to be fed into Anaerobic Digesters after suitable pre-treatment or sent and fed into In-Vessel Composting (IVC) after front-end removal at the AD facility.

* A SEPA funded study (Plastic in food waste at compost sites, Project report, November 2019, <https://www.r-e-a.net/resources/sepa-report-on-compost-feedstock-quality/>) on physical contaminants (with emphasis on plastic contaminants) in domestic and commercial food wastes received at Scottish composting sites found that the results of examining and quantifying the plastics provided '...a strong indication that provision of compostable caddy liners by local authorities leads to lower plastic contamination (both in terms of the bag itself and the contents of the bag)'.

REA analysis of some of the study's Table 2 data found that where local authorities provided compostable caddy liners, total non-compostable plastics (bags/liners and plastic inside the bags) was 0.224 %, 1.46 times higher than the 0.327 % w/w they represented where other local authorities did not provide compostable caddy liners (figures on a % w/w fresh matter basis). We regard this difference as significant because Scotland's plastics limits on product status composts and digestates derived from wastes are among the tightest in the world.

In Scotland AD sector compliance with considerably tighter plastics limits than in PAS 110 has been achieved through more finely screening digestates to remove even more plastic > 2 mm in the digestate, with the screened-out plastics and digested solids being sent to EfW or landfill facilities. If non-packaged and user-unpackaged food waste were to be collected only in bags/liners compliant with our policy (or none) then a higher percentage of the organic matter and nutrients locked into the organic matter in the food waste could reach soils, via higher marketable yields of digestates and composts (the latter where the AD operator front-end removes compostable bags/liners and sends them to IVC).

Package 4: Improve recycling from commercial businesses

7 To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses?

Strongly disagree

Supporting evidence:

REA support many of the proposals outlined, with the exception of the proposals to research and pilot commercial waste zoning. We support the proposals for improving the data collects on commercial waste and are aware that our members already hold useful data on this. We would be happy to engage further with our members to determine what data that is already collected can be shared.

Whilst there have been improvements in the amount of food waste collected, our members report there is still widespread non-compliance with the regulations with respect to food waste collections. We support the review of compliance and would be happy to facilitate the sharing of information from our members to aid with the review. Any measures taken to improve commercial waste recycling must be underpinned by adequate resources, both for communication and awareness of the requirements but also for enforcement.

We strongly disagree with the proposals for commercial waste zoning. This idea is fraught with difficulty and our members are concerned about the impact of this and that it will undermine existing service providers. Once a contract has been awarded for a particular geographic area, this will eliminate competition, reduce flexibility, innovation and drive down the level of service that the winning tenderer will deliver. We believe that it might face a legal challenge if implemented on a large scale as it is anti-competitive. REA fully support the position of RMA on this topic and echo many of their comments from their response. There is huge potential for this to damage the waste and resource sector and lead to job losses and a reduction in investments. There are other ways to achieve the aims such as reducing vehicle movements and improving air quality which won't have the same devastating impact on service providers.

8 Are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?

Further measures to include:

The review of the rural area exemption for food waste collections must include the collection of food waste from businesses. Our members report there are many instances where food waste producing businesses could easily access a food waste collection service, but opt out due to the rural area exemption.

REA support looking at alternative measures to the commercial zoning proposals to achieve improvements in commercial waste recycling. We support the RMA proposal for a commercial recycling improvement pilot as detailed in their consultation response.

Alternative measures that should be considered include:

- Piloting a commercial recycling improvement programme – working with key stakeholders to co-design and implement measures to improve recycling performance.
- Look at alternative collection options – for example using alternatively powered vehicles or restricted collection times
- Investigate take back models, such as the resource hub approach in Amsterdam

Package 5: Embed circular construction practices

9 To what extent do you agree with the measures proposed in this package to embed circular construction practices?

Agree

Supporting evidence:

REA welcome the proposals to prevent soil and stones going to landfill. Soil is an important resource which takes millions of years to form but can quickly be degraded and it is important that we value and recognise the importance of soil. There are currently regulatory barriers in place for the re-use and recycling of soils and these need to be address to better facilitate this whilst protecting the environment.

We have members involved with the recycling of soils and have had discussions with SEPA about the end of waste for virgin topsoil. We would welcome the opportunity to provide further input into these discussions.

10 Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?

Further measures to include:

Package 6: Minimise the impact of disposal

11 To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?

Agree

Supporting evidence:

We support the development of a Residual Waste Plan to set strategic direction until 2045. It is essential that this is in line with the waste hierarchy. Energy from waste does have a place in the waste sector, once all other options above it in the hierarchy have been utilised and maximised. For example, separate collection of organic wastes for use in AD and composting are given a higher priority on the waste hierarchy.

12 Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?

Further measures to include:

Package 7: Cross-cutting measures

13 To what extent do you agree with the measures proposed in this package to support action across the circular economy?

Agree

Supporting evidence:

Good data is key to smart decision making and REA support the proposals to improve digital waste tracking.

Communications for householders should go further than stating what materials are or not acceptable. They need to include details on what happens to the waste, how is it recycled and what it is used for, explaining that it is often part of the food chain. This helps to explain why the quality of material is important and why householders should care about what they put in the bin. Examples of effective communication on biowaste collections in Italy is where they run dedicated awareness campaigns which include: direct marketing (letters to all residents, posters, leaflets and bin stickers), direct contact with building managers and citizens, a smart phone app, public meetings, a customer contact centre and school educational projects with special materials for students. They share relatable information about how the residents' waste is processed and what benefits the outputs bring to the environment and economy.

With regards to sustainable procurement, we support the requirement for public sector bodies to support circular economy through their procurement choices. For example, many local authorities use soil improvers and growing media in their parks and gardens, through amenity or neighbourhood services. They could mandate that where technically suitable, they use compost (or fibre digestate), recycled products that are produced using wastes arising in Scotland.

We support the proposals to increase and develop green skills, training and development opportunities.

14 Are there any further measures that you would like to see included in the Route Map to support action across the circular economy?

Further measures to include:

This road map must consider and incorporate the other issues relevant to Scotland such as the fuel, fertiliser, and energy crisis. Wherever possible these should be considered alongside the waste and resources issues. For example, Anaerobic digestion can not only treat food waste but also generate renewable energy (electricity and gas), heat, carbon dioxide and produce renewable fertiliser to replace energy intensive mineral fertilisers. Composting can treat garden and food waste to produce a source of nutrients and organic matter for soils. Increasing soil organic matter has multiple benefits, improving soil structure, preventing erosion, reducing the impact of extreme weather and improves the soil's ability to store carbon.

Beyond 2025

15 To what extent do you agree with the principles proposed to underpin future circular economy targets?

Agree

Supporting evidence:

We believe that the Climate Crisis is urgent and therefore this type of work and target is essential in making good decisions which are future proofed, support investment in the right activity and reduce activity in damaging areas. It should be supported with scenario planning to consider what impacts short term alternative measures may cost if we miss other targets.

We also agree to align with EU laws where it makes sense to do so and go beyond if we decide that is what is needed. We should ensure that we deliver what is right for Scotland, Scottish business sectors and people of Scotland first.

Impact assessments

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

Further information:

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

Further information:

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

Further information:

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

Further information:

20 Please provide any further information or evidence that should be considered with regards to the environmental impact of proposals outlined in the Route Map.

Further information:

About you

21 What is your name?

Name:

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22 What is your email address?

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23 Are you responding as an individual or an organisation?

Organisation

24 What is your organisation?

Organisation:

The Association for Renewable Energy and Clean Technology

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

Publish response with name

26 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

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

I consent

Evaluation

28 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Was really useful to have Jane and Janet attend a webinar we held for members to outline the sections of the consultation relevant to organics - thank you!

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.:

Formatting of answers to make them easier to read is not great in citizen space.