

Response ID ANON-RK58-D2KQ-V

Submitted to Scotland's draft Circular Economy and Waste Route Map to 2030 - consultation
Submitted on 2024-03-15 17:17:41

Part A : Reduce and reuse

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

Agree

Please provide evidence to support your answer if possible.:

The REA agrees with the priority actions proposed within the Reduce and reuse strategic aim. The paragraphs below outline our positions on each relevant priority action in more detail. Product Stewardship Plan: The Scottish Government plans to publish a Product Stewardship Plan (PSP) by 2025/26 and this year is commissioning research 'to ensure a robust evidence-based approach to building a model for product stewardship in Scotland. REA's high level comment is that packaging and non-packaging products designed to be home composted, organically recycled* or organically recovered* are within scope of product stewardship. * By being commercially composted, anaerobically digested and composted or broken down in a suitably equipped AD facility. Recycled or recovered status depends on whether the compost / digestate output meets End of Waste criteria. We agree that whoever designs, produces, sells or uses such products should take responsibility for minimising their environmental impact throughout all stages of the product's life cycle. Some specifics of a PSP may need tailoring for home compostable products and/or industrially compostable products. Considerations for mechanically recyclable and for chemically recyclable products are not the same in detail as what needs to be considered for home compostable products (counted as 'waste minimisation' when composted at home), industrially compostable products (organically recyclable) and home-plus-industrially compostable (organically recyclable) products. REA would be pleased to work with Scottish Government on checking and ensuring the PSP's content is also appropriate for the compostable products. One of the product types Scottish Government is considering prioritising under its PSP Plan is textiles. It recognises 'the need for a strategic approach to textiles across the waste hierarchy, from production and consumption, through to recycling, and end of life management'. We note a within-UK vendor of industrially compostable towels and capes for use in/when hair dressing (and, unfortunately other on-line vendors of disposable, vaguely-termed 'biodegradable' hair dressing towels). Operators of commercial composting processes in Scotland (and in other countries in the UK) have tended not to seek 'natural-fibre, natural-colour only' and/or independently certified industrially compostable textile wastes. Some composters in Scotland are likely to have permits that allow them to accept such used items, while others may not (and this permit landscape is likely to be similar in other countries in the UK). We anticipate the annual tonnage in future of any commercial composting of 'natural-fibre, natural-colour only' and/or independently certified industrially compostable textile wastes is likely to be very low as a percentage of total textile waste arisings in Scotland (and in the UK). Nonetheless, the REA would be pleased to talk with Scottish Government about its strategic approach to textiles and its appropriate coverage of the specific sub-set that can be commercially composted. Reducing Food Waste: REA supports the Scottish Government's priority actions to reduce food waste from an environmental and economic perspective. As the data in the consultation plan shows, reducing and recycling food waste is critical to achieving net zero and reducing environmental harm. The economic benefits of reducing and recycling food waste is multi-pronged. According to the 2021-22 Household Food and Drink Waste report, UK households wasted 17 billion pounds of food and drink in 2021/22 (WRAP 2023). Changing consumption patterns could put this money back in consumers' pockets. Improving food waste management will also reduce contamination in organic waste feedstocks. A report from the International Solid Waste Association (ISWA) shows that every one tonne of contamination removed by processors costs between 160 to 200 pounds (ISWA 2023). Reducing contamination could lead to considerable savings given UK households are currently producing 6.4 million tonnes of food waste per year (WRAP 2023). We agree that the Scottish Government should be prioritising investment in public education and changing household behaviours by reviewing and delivering an intervention plan. In the REA submission to the Spring Statement 2024, we stressed the importance of funding Local Authorities to deliver local, targeted communications, as well as funding for centralised waste management campaigns to ensure a consistent message on (1) reducing food waste, (2) using the correct bins, and (3) the importance of food waste recycling. The Contaminant Management Hierarchy from the ISWA cites 'Prevent' as the most important step in preventing contamination of organic waste and improving recycling rates. One of the three components of prevention cited in the report is the "frequency and quality of information and awareness raising in order to educate and facilitate behavioural change" (ISWA 2023). Recent trials reiterate the importance of education and communication. The Compostable Coalition UK reported a 5-fold increase in consumers disposing of their compostable packaging in the food waste bin following their first-of-its-kind consumer behaviour trial (Compostable Coalition 2024), and Fife Council collected an extra 1.573 tonnes of food waste to be recycled during their successful high-rise buildings trial funded by Zero Waste Scotland (Fife Council 2024). We believe that investment in quality education and communications via the forthcoming intervention plan will reduce food waste in the first instance and ensure quality food waste recycling in the second. REA also supports the proposal to implement mandatory reporting for food surplus and waste by businesses. We would like as many businesses as possible to analyse and report their food waste data, as the requirement to report, means businesses will be measuring food waste. The measurement of food waste makes it visible and more likely to drive actions to reduce it, or when reduction or redistribution is not possible, for it to be separately collected and biologically treated.

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

Strongly agree

Please provide evidence to support your answer if possible.:

We agree with most of the further actions to 2030 listed across the Reduce and reuse strategic aim. However, we make a specific ask given the Scottish Government's intention to introduce environmental charges and introduce a charge for single-use disposable cups by 2025, if the Circular Economy Bill is passed. Further Actions on the Product Stewardship Plan: Regarding the proposal to introduce a charge for single-use disposable cups by 2025, please exempt the following from the charge or, as our second preference, apply a lower charge to them: · Independently certified industrially compostable* hot and cold drinks cups and lids under the following conditions: o They are used in premises, or at temporary locations for outdoor events, where there is insufficient capacity and facility to use, wash and store re-usable cups or it would be unsafe to use ceramic or glass cups; o Those premises provide bins for disposal of these cups with food waste or with other used certified industrially compostable food-service ware items; and o Wastes in those bins are supplied to commercial composting, AD plus composting, or suitably equipped AD facilities that accept those wastes. An example of a suitably equipped AD facility is one with a pre-AD autoclave and screen set-up, which would reduce the compostable fibre items and compostable fibre-based items to a

pulpy 'soup', e.g. compostable hot drinks cups. *We can provide Scottish government with detail on how to specify this in the relevant document(s). To qualify for the exemption (or lower charge), companies placing compostable hot and/or cold drinks cups on the market would need to demonstrate that suitable arrangements are in place with premises where the products will be used and with contractors who collect the relevant wastes and operators of relevant composting, AD+composting and/or suitably equipped AD facilities. For Scottish Government's awareness, so far, there are the above kinds of closed-environment arrangements in place for use (at some offices, festivals and sports venues), collection and organic recycling (via commercial composting to date) of a range of food service-ware products. We have also previously had some discussion on potential use of compostable food service-ware in targeted zones within a prison premise. Further Actions to Reduce Food Waste: REA strongly support the review of the rural exemption for food waste collections. We feel this is particularly important for commercial food waste collections. Members report there are businesses in many areas 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 to move food waste up the waste hierarchy. REA also support the collection of data and evidence. This helps identify trends and can inform decisions about interventions for tackling food waste. Soil is a valuable resource. It takes many thousands of years to form and can be destroyed quickly by poor management. We need to facilitate the reuse of soils wherever possible, and they should only be landfilled when not suitable for alternative uses. REA supports the proposals to investigate and promote ways to reduce soil disturbance and volumes going to landfill. We suggest establishing an end of waste route for virgin topsoil would be beneficial. This would set clear parameters for companies looking to recycling soils and incentive their re-use. We support the proposals to deliver enhance support for businesses with regards to food waste. There needs to be a whole supply chain approach and it is important that this is underpinned by effective enforcement. To date, enforcement of the requirement for food waste collections has been patchy and as a result there is widespread non-compliance with the regulations regarding food waste collections. The REA are supportive of additional support for businesses 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 current and any future legislation.

Part A: Modernise recycling

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

Please provide evidence to support your answer if possible:

REA strongly support measures that will result in high performing household recycling collections. We believe Local Authorities are best placed to understand their areas and what measures are most appropriate for their residents. 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. Local authorities are best place to understand the best approach for their areas, so the design process should take this into account and focus on the objective of high performing collections without prescriptive mandates on how this must be achieved. Whilst regards to commercial collections, whilst there have been improvements in the amount of food waste collected, our members report there is still widespread non-compliance with the regulations. 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 support a co-design approach for commercial collections and it is important that this includes input across the value chain, waste producers, waste collectors along with the treatment facilities.

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

Please provide evidence to support your answer if possible:

REA support proposals to strengthen householder's duty of care in relation to waste along with the proposals to give local authorities more tools to support household recycling contamination. Currently there is little visibility to the householder on the fate of their waste, and little awareness of the impact of any contamination. There is also no or little consequences for the household who contaminates their bin, despite it having an impact on the treatment facility. Contamination costs time and money to remove it; we estimate at least £7.5 M per annum in the UK. REA has previously published a case study analysing an AD member's data - this showed the operator was paying £156 per tonne to separate unsuitable-to-digest items and the organic waste that was stuck to them, to wash what was extracted, press the washed items, transport those items to landfill and pay disposal fees. This is broadly in line with other countries. A recent report from the International Solid Waste Association (ISWA) suggests that every one tonne of contamination removed from organic waste and disposed of, costs the operator between £150-200. A recent report from America suggests that on average 21% of composter operating costs are spent on contamination removal. With regards to giving local authorities more tools to support household recycling and reduce contamination, REA support proper funding for effective education and communication. This 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. Studies have demonstrated that education programmes, along with the correct tools (i.e. kitchen caddies and liners for food waste) have resulted in increased capture rates, lower levels of contamination and a reduction of food waste in the residual bin. We support the proposals for local authorities to be able to issue written warnings and where those warnings are not heeded, civil penalties or fixed penalty notices to householders who place the wrong materials in waste and recycling bins. Considering the introduction of statutory recycling and reuse local performance targets for household waste services, REA supports the proposals and suggest this should include targets for the amount of organic waste that remains within the residual bin. 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.

Part A: Decarbonise disposal

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.

Agree

Please provide evidence to support your answer if possible:

We support both objectives proposed to decarbonise disposal. While we support a residual waste plan it is important that the plan is aligned with broader waste policy objectives. Residual waste is the material that is left over after materials that can be used higher up the waste hierarchy have already been taken out of the waste stream. Therefore, the accompanying policies that will impact the volume and composition of residual waste should be considered when creating the new residual waste plan. The plan should both recognise the vital role of traditional energy from waste plants in providing residual waste management capacity, as well as the urgent need for innovative and advanced technologies that will enable Scotland to use residual waste in hard-to-abate sectors, such as in production of renewable transport fuels. We also believe the plan should recognise that some energy from waste sites, especially those using waste wood or combined heat and power (CHP), are currently supported by the Renewables Obligation scheme (RO) which will start to come to an end in 2027. The plan will need to provide a clear indication of how Government wishes to ensure existing capacity is not lost from plants decommissioning once the renewable obligation programme ends. Failure to do could undermine residual waste plans. A sector led plan on decarbonisation is also welcome. However, the plan will need to align with broader waste policy and UK-wide decarbonisation plans to ensure successful implementation. In particular, the plan should consider the decarbonisation readiness plan requirements and include energy from waste in the UK ETS.

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.

Agree

Please provide evidence to support your answer if possible:

We support all proposed further actions alongside other action preventing biogenic waste from entering landfill. As stated above, the inclusion of energy from waste in the UK ETS must be aligned with wider waste policy and the rest of the UK. We encourage all governments to ensure the process for inclusion by 2028 is well managed and includes substantial, meaningful consultation with the sector. We also ask the Scottish and wider UK Government to investigate and announce how they intend to support existing energy from waste capacity once projects begin to reach the end of their Renewables Obligation (RO) support. This applies to both waste wood sites and energy from waste with CHP. One suggestion on this would be increasing the priority level of action 'Increase the capture of landfill gas'. Currently, landfill gas electricity generators are incentivised under RO, but support for 85% of the sector in the UK is due to end in April 2027. Scotland's share of electricity generated from landfill gas was around 300GWh in 2021, representing significant capacity. Industry analysis shared with the UK Government (which REA would be happy to share and discuss with Scottish Government) shows that generation is not commercially viable if dependent on power sales alone. In the absence of RO support or any viable alternative, landfill sites are considering decommissioning equipment and disbanding operational teams – losing the benefit of years of accumulated expertise in managing these sites. While flare installation is mandatory at sites, there is a high risk that the overall rate of methane capture will decline. Avoiding this is vital considering the much higher potency of methane as a greenhouse gas compared to CO₂, and given that the UK has committed to reduce methane emissions by at least 30% by 2030 under the Global Methane Pledge. The UK Government recently ran a consultation on future development of the Contracts for Difference scheme. This ruled out support for landfill gas electricity generation. Although there was a commitment to work with industry to find a viable solution, there are yet no credible proposals on how this will be developed. Given the deadlines for loss of support, taking action on this (either at UK or Scotland level) should be a priority, rather than just a 'further action'.

Part A: Strengthen the circular economy

7 To what extent do you agree with the priority actions proposed within the Strengthen the Circular Economy strategic aim? Please provide evidence to support your answer if possible.

Agree

Please provide evidence to support your answer if possible:

In general, we agree with the priority actions proposed within the Strengthen the circular economy strategic aim. We agree that requiring Scottish Ministers to publish or refresh a circular economy strategy every five years is important. However, we also want to emphasise the importance of acting on those plans. Having a strategic plan towards a circular economy is only useful if all the stakeholders involved have the resources, infrastructure, and capacity to deliver the desired outcomes. Therefore, we would like to stress the importance of making the plans practical, realistic and reasonable according to the organisations and businesses involved in delivering the plan. Clear communication with industry thorough planning and delivery will be critical to ensuring the recycling sector can deliver desired outcomes. Prioritising sectors and systems which are most likely to contribute to a circular economy is an important piece of this legislation. We believe composting and anaerobic digestion should be one of the most important systems involved in a 5-year circular economy plan given the significant greenhouse gas emissions from organic waste and the proven benefits of compost and digestate to soil. We also believe the requirement to report on progress is critical to the success of these plans. In addition to emphasising the importance of reporting on 5-year Circular economy plans, we would like to strongly support the Scottish Government in setting new circular economy targets. Existing data on organic waste management is incomplete and inconsistent which limits the advancement of the energy from waste and organic waste recycling sectors. Transitioning to material-specific targets will strengthen the argument for the industries that will play key roles in delivering a circular economy – boosting investment and moving Scotland towards net-zero targets. The new indicators should be measurable and consistent so that future planning and

decision-making is based on accurate and understandable datasets. It would be useful for the new indicators to be harmonised with England, Northern Ireland and Wales to ensure comprehensive data sets.

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

Please provide evidence to support your answer if possible:

REA strongly agrees with the further actions listed under this strategic aim. We support reviewing and refreshing Scotland's Waste Data Strategy's action plan but emphasise (as mentioned above) the importance of making these plans reasonable and actionable through collaboration with industry stakeholders. We strongly support further research proposals, especially on behaviour change. As mentioned in our answer to Question 1, contamination is one of the key issues in organic waste recycling and the best solution is helping householders dispose of their waste in the correct bins. This requires behavioural interventions, so any additional research on this topic is very welcome. REA also supports the proposal for greater uptake of green skills, training, and development opportunities. As mentioned above, Scotland will not be able to achieve the goals outlined in the Route Map and forthcoming circular economy plans if industry does not have the capacity to deliver them. Organic waste recycling is critical to (1) keeping organic waste out of landfills to reduce GHG emissions and (2) providing organic soil-improvers, but like the resources sector in general, organic waste processors continue to struggle with recruitment and hiring. Each of the training and education programs proposed should include organic waste processing as a viable and valuable career option for young people. According to CIWM, currently the UK's resource and waste sector turns over an estimated £9billion per year and provides 150,000 jobs whilst carrying out a number of activities including waste collection, treatment, recycling, reprocessing, disposal and the generation of energy from waste. Over the next decade, the sector will have an increasingly important role to play as the UK seeks to improve resource availability and security and the need to supply quality secondary raw materials and feedstocks from a wide range of different waste streams increases. This cannot happen without people with the appropriate skills. We need to upskill our workforce and attract new talent whilst collaborating with other sectors, academia and leading professional bodies to drive an effective transition to a more Circular Economy. Government has a role in setting out a clear vision that has skills at its heart, recognising that resources and waste sector is a priority sector and increasing the sector attractiveness within schools and colleges.

Part B: 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:

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:

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:

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

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

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

What is your name?

Name:

Jenny Grant

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

The Association for Renewable Energy and Clean Technology

Further information about your organisation's response

Please add any additional context:

The Association for Renewable Energy and Clean Technology (the REA) is a not-for-profit trade association, representing British renewable energy producers and clean technology and promoting the use of renewable energy in the UK. It has around 550 corporate members, making it the largest renewable energy trade association in the UK.

The REA's Organics and Natural Capital forum and its Biogas forum together comprise 422 members, numerous of which operate commercial composting facilities, commercial-scale anaerobic digestion (AD) facilities and recycle organics to land. The REA works with stakeholders to achieve policy and regulatory frameworks for renewables and organic waste recycling that deliver an increasing contribution to the UK's electricity, heat, recycling, and transport needs. More info available at www.r-e-a.net.

To develop this consultation response, we created an online briefing on the consultation for members. We requested feedback via multiple newsletters and then drafted a response. We sent the draft response to 1029 recipients and asked for feedback. 592 individuals opened the email a total of 821 times. We incorporated any feedback into the response before submission.

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

Publish response with name

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

Yes

What is your email address?

Email:

jenny@r-e-a.net

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

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?:

Slightly satisfied

Please enter comments here.:

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 and re-visiting long text answers is difficult.