

Response ID ANON-6UXN-C1U4-E

Submitted to Changes to waste management services
Submitted on 2025-06-17 14:09:02

Rural Food Waste Exemption

14 Are you located in an area with a rural food waste exemption?

No

14 What is your preferred approach to the rural food waste exemption in the future?

Remove it

If other, please provide your answer here.:

REA supports measures to maximise the quantity and quality of unavoidable food waste collected from households and businesses. The more organics that are removed from the residual waste stream, the better. This material is effectively recycled in Scotland to produce renewable energy (if treated through AD) and the nutrients are recycled through the production of biofertilisers and composts. These nutrients can be returned to land to grow more food – the circular economy in action. This has multiple benefits, such as improving soil health, reducing the reliance on artificial fertilisers which helps to decarbonise farming and boosts the security of supply of fertilisers.

For businesses, there are many areas that are currently exempt from food waste collections, that both produce significant quantities of food waste and have access to a collection system (i.e. there is a service provided nearby). The current exemption is used as an 'excuse' to not treat this material higher up the waste hierarchy. Removal of this exemption would ensure this food waste will be captured and recycled.

The current food waste exemption is effectively a barrier to developing the collection systems and reprocessing industry in these areas. Collection systems and vehicles have evolved since the introduction of the exemption. It is important to note that the food waste is still collected from these areas, just not separately but as part of the residual waste. It is possible to have a separate collection pod for food waste to enable it to be separately collected without the need for an additional vehicle and the associated cost and carbon impact of this. Furthermore, the upcoming ban on biodegradable municipal waste to landfill in Scotland presents an additional legislative driver to ensure that organic waste is separated from residual waste at the point of discard. Removing the rural exemption is a common-sense measure to ensure that the ban can be effectual in practice.

For household collections - given that in some areas there is still a significant amount (30%) of food waste in the residual bin, there needs to be further action taken to ensure this material is presented separately.

Having a consistent requirement for food waste collections for the whole of the country would enable more consistent messaging and behaviour change campaigns to be delivered without increasing confusion with the general public who may not currently have access to a collection.

15 If your local authority were to offer a kerbside food waste collection service, would you be likely to opt-in?

Very likely

16 If you live or operate a business in an area in which the rural food waste exemption is used, what do you currently do with your food waste?

Not Answered

If other, please provide your answer here.:

17 Do you have any other views regarding the rural food waste exemption?

Please provide your answer here.:

The rural food waste exemption is effectively a barrier to changing the behaviour of food waste producers and to developing a collection system that would provide a cost-effective food waste collection service.

The forthcoming landfill ban of biodegradable municipal waste is likely to reduce the disposal options for most food waste producers including local authorities which will have the additional cost of providing any additional infrastructure and resources and may require financial assistance to introduce a new collection service.

Whilst we support the removal of the exemption to facilitate an increase in participation in food waste recycling, there may be instances where collecting small volumes is financially and environmentally prohibitive, therefore we would suggest consideration is given to retaining some form of exemption in cases where it can be demonstrated that collecting this material is not economically or environmentally beneficial (e.g. very remote areas), in such cases it may be that promoting alternative treatment methods (e.g. on-site treatment in a digester) is preferable. There should also be an exemption in place for those households and businesses who choose to treat their food waste on-site, i.e. home or small-scale composting.

In addition to removal of the rural area exemption, there needs to be an increased focus on capturing more food waste, even in areas where the

exemption has not applied. The amount of food waste that remains in the residual bin in some areas is a directly result of the lack of participation by householders. There needs to be widespread education and communications to drive behaviour change – similar to previous campaigns regarding littering or materials that should not be flushed.

To ensure we are maximising the capture of food waste, removal of the exemption needs to occur in addition to a national communication strategy and campaigning programme to raise awareness, develop understanding, and enable the public and industry to take action to help support and realise the requirements across the wider Scotland's circular economy and waste route map to 2030.

More efficient reprocessing of all material streams and returning greater volumes of organic matter to the UK's degraded soils are also essential actions to achieve Scotland's target to achieve net zero emissions by 2045.

All Consultation Topics

18 Equality: Are there any additional likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to protected characteristics?

Please provide your answer here.:

We do not foresee additional impacts any sectors of the community that are able to manage their own waste materials at present and resources are available to help those that are disabled or unable to utilise existing collection arrangements to participate.

19 Business and Regulation: Do you think that the proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any business or sector?

Please provide your answer here.:

The proposals within the consultation may place an additional burden on business and the waste management sector due to the need to collect and process food waste separately. However, recent change in landfill tax and the overall cost of residual waste disposal against the lower costs of food waste treatment and disposal should be factored into any business case for changing behaviours towards food waste, collection methods and services to work towards a cost neutral model.

20 Children's Rights and Wellbeing Impact Assessment: Do you think that the proposals contained in this consultation are likely to have an impact on children's rights and wellbeing?

Please provide your answer here.:

We do not foresee any impacts on children's rights and wellbeing.

21 Islands Communities Impact Assessment: Do you think that the proposals contained in this consultation are likely to influence an island community significantly differently from its effect on other communities in Scotland?

Please provide your answer here.:

We do acknowledge that some Island communities may require additional consideration dependant on their size and population and access to suitable cost effective transportation and treatment facilities and may require further consideration in terms of any future exemptions.

22 Fairer Scotland Duty: Do you think that the proposals contained in this consultation are likely to have an impact in relation to the fairer Scotland duty?

Please provide your answer here.:

We do not foresee any impacts in terms of the fairer Scotland duty.

23 Environment: Do you think that the proposals contained in this consultation are likely to have an impact on the environment?

Please provide your answer here.:

We consider that the separation, collection and treatment of food waste will have a positive impact on the environment, but only if undertaken in a sensible and environmentally aware way by considering all the options available including behaviour change to remove or reduce food waste arisings, local treatment options to minimise transportation and the adaption and alternative use of current collection fleets to reduce the need for additional collection vehicles. The outputs from organic recycling also have a positive impact on the environment, so the benefits are not solely related to diversion from disposal, but also recycling the nutrients back to land for the benefit of soils.

24 Conclusion: Do you have any other comments that you would like to make, relevant to the subjects of this consultation, that you have not covered in your answers to other questions?

Please provide your answer here.:

Call for Evidence on Extending Landfill Ban

1 Which category in the following list best describes you?

Not Answered

Please provide further details:

2 If you are replying on behalf of a business or representative organisation, please advise where your business is located, and an approximate size/number of staff (where applicable).

If you are replying on behalf of a business or representative organisation, please provide the name of the organisation/sector you represent, where your business is located, and an approximate size/number of staff (where applicable). :

3 Do you produce or handle/dispose of EWC (European Waste Catalogue) 19 12 12 wastes?

4 If you produce waste from mixed non-municipal and municipal sources, can you provide data on the proportion of EWC 19 12 12 wastes coming from non-municipal sources?

Not Answered

Please provide information here:

5 Do you have any data on the composition or characteristics (e.g., biodegradability) of EWC 191212 wastes sent to landfill at any point over the past 10 years?

Not Answered

Please provide further information:

6 Are there alternative treatment options available to you for sorting residues (EWC191212 wastes) that could reduce the environmental impact of managing or disposing of these wastes? Are there any barriers to adopting alternative treatment options?

Not Answered

Please provide further information:

7 Do you have any evidence about the need to continue landfilling sorting residues from the treatment of non-municipal waste?

Not Answered

Please provide further information here:

8 Do you agree with the list of non-municipal waste that are likely to be biodegradable and maybe biodegradable wastes, are there other wastes you consider biodegradable and do you have evidence on the biodegradability of any of these wastes that you can share?

Not Answered

Please provide further information here:

9 Are there biodegradable wastes, from Tables 6.2.1 (pg.11) and 6.2.2 (pg.12) or otherwise, that you think will need to be landfilled in the future?

Are there biodegradable wastes, from Tables 6.2.1 and 6.2.2 or otherwise, that you think will need to be landfilled in the future? :

10 Our Circular Economy and Waste Route Map noted an intention to identify priority waste streams to mitigate environmental impacts. Which waste streams would you consider to be the priority waste streams to divert from landfill?

Our Circular Economy and Waste Route Map noted an intention to identify priority waste streams to mitigate environmental impacts. Which waste streams would you consider to be the priority waste streams to divert from landfill? :

11 Are there treatment options available for biodegradable wastes, from Tables 6.2.1 (pg.11) and 6.2.2 (pg.12) or otherwise? Do you have evidence or thoughts on why these materials continue to be landfilled?

Are there treatment options available for biodegradable wastes, from Tables 6.2.1 and 6.2.2 or otherwise? Do you have evidence or thoughts on why these materials continue to be landfilled? :

12 What are the potential positive and negative impacts of not including soil in an extended landfill ban?

What are the potential positive and negative impacts of not including soil in an extended landfill ban? :

13 Do you have any views and/or evidence on the suitability of TOC (Total Organic Carbon), AT4, Dynamic Respiration or loss on ignition tests to determine the biodegradability of non-municipal wastes?

Do you have any views and/or evidence on the suitability of TOC, AT4, Dynamic Respiration or loss on ignition tests to determine the biodegradability of non-municipal wastes? :

14 Do you currently carry out biodegradability testing of non-municipal wastes and if so, are you able to share any evidence or information on the testing that you carry out?

Not Answered

15 Would a ban on landfilling mattresses support increased recycling of end-of-life mattresses?

Not Answered

Please provide further information here:

16 Would a ban on landfilling mattresses lead to the diversion of mattresses to incineration?

Not Answered

Please provide further information here:

17 If mattresses could no longer be landfilled, what other barriers are there to increasing the recycling of mattresses?

Please provide answer here:

18 What other policies should be considered to encourage the continued diversion of waste, particularly biodegradable waste, away from landfill?

Please provide answer here:

19 Are there changes to the Scottish Landfill Tax, or other fiscal leavers such as the forthcoming Scottish Aggregates Tax, that could incentivise the diversion of wastes away from landfill, particularly biodegradable wastes that will not fall under the landfill ban?

Please provide answer here:

20 What could the Scottish Government do to incentivise investment in alternative treatment infrastructure?

What could the Scottish Government do to incentivise investment in alternative treatment infrastructure?:

21 If further waste streams were to be included in the landfill ban, what timescale for implementing the ban would allow for industry preparations?

Please provide answer here:

22 Are you able to share information about the potential costs associated with diverting waste to alternative treatment options for the wastes detailed here (including for example costs of testing)? (Please provide details and impacts if possible)

Please provide answer here:

23 Do you have any evidence of other, unintended consequences of diverting waste, particularly biodegradable wastes, away from landfill (such as flytipping)? (Please provide details and impacts if possible)

Please provide answer here:

24 Do you have any other comments or evidence that you would like to share on the potential expansion of the ban on landfilling biodegradable municipal waste?

Please provide your answer here:

About you

What is your name?

Name:

Jenny Grant

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
REA - Renewable Energy Association

Further information about your organisation's response

Please add any additional context:

The Renewable Energy Association (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 500 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 around 400 members, numerous of which operate commercial composting facilities, commercial scale anaerobic digestion (AD) facilities and recycle organics to land. The REA engaged with members regarding this consultation, used their feedback to draft this response and circulated a draft to members to enable them to provide further feedback. More info available at www.r-e-a.net.

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.:

Slightly annoying that formatting doesn't translate to the text boxes.