Response ID ANON-HSP7-WWXS-U

Submitted to Draft Circular Economy Strategy
Submitted on 2026-01-13 16:48:29

Questions

1 To what extent do you agree with the vision and outcomes for the strategy?

Agree

2 Do you have any comments on the vision?

Please provide comments in the text box below:

The REA supports Scottish Government's ambition to become net zero and nature positive by 2045 and agrees with its assessment that the transition to a Circular Economy will be an essential enabler to meet this commitment.
Moreover, we're reassured to see that the vision addresses not only economic and environmental benefits but also societal needs, such as the imperative for the benefits and opportunities offered by a circular economy to be distributed fairly across Scottish society. For the Circular Economy to be successful and resilient to potential political headwinds, the benefits of this new model must be seen and felt fairly by people across the whole of Scotland.

3 Do you have any comments on the outcomes?

Please provide comments in the text box below:

Broadly, we support the intended outcomes outlined, and again appreciate that the Draft Strategy considers Economic, Environmental, and Social outcomes.
However, with regard to the Economic outcome stating, 'We will have a circular economy that drives innovation, investment, and the creation of new business models and jobs,' we think it important to highlight that the circular economy can drive innovation only to the extent that the regulatory and policy environment is supportive.
In order to fully mobilise the circular economy transition, a more proportionate regulatory landscape is essential. We have expanded on this in greater detail in our answer to Q8e.

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

Agree

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

Please provide comments in the text box below:

Either within 'Policy alignment and systems thinking', or as a separate 'mechanism', there should be greater attention paid to the role of the regulatory system as either a blocker or enabler to the Circular Economy transition. We have expanded on this in greater detail in our answer to Q8e.

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

Please provide comments in the text box below:

Behaviour change
We agree that behaviour change is critical to a successful Circular Economy transition and requires an 'enabling environment' in which people have the capability, opportunity, and motivation to act in more 'circular' ways.
Specific comments on behaviour change interventions in the bioeconomy sector can be found in our answer to Q8e.

Procurement
We agree that public procurement is a powerful tool to help shift the acceptance of more 'circular' products. While this section largely focuses on the procurement of recycled or recyclable products, where appropriate we'd also encourage government to move up the waste hierarchy in its procurement processes to consider purchasing items that are designed for reuse and repair (e.g. electronics, office goods, etc.) alongside recyclability criteria.
Specific comments on procurement interventions in the bioeconomy sector can be found in our answer to Q8e.

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

Agree

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

We support the proposals outlined.

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

We support the proposals outlined.

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

Please provide comments in the text box below:

Priority: Work with the bioeconomy sector to develop a roadmap

REA welcome the proposal to work with the sector to develop a roadmap and we would like to contribute to the development of this roadmap.

We're pleased to see that this draft strategy recognises the innovation and investment opportunities the circular economy can provide—and particularly within the bioeconomy sector. Yet the extent to which these opportunities can be exploited is dependent on a supportive regulatory and policy environment.

The circular economy transition is already well underway in the bioeconomy sector, with the market driving businesses to regularly identify new and promising solutions to make better use of existing resources. Yet the current regulatory system is often the main blocker to bringing these innovations into commercial use.

For instance, digestate, a nutrient-rich organic material produced from Anaerobically Digested food waste, can be sold and used as a product in Scotland, as per SEPA's end-of-waste position. However, many AD businesses wish to process the digestate so that it more closely resembles the mineral fertilisers farmers and land managers are accustomed to using. This would enable greater uptake of food-waste derived fertilisers in place of carbon-intensive, fossil-based traditional fertilisers – achieving many of the outcomes this strategy aims to achieve (e.g. reducing dependency on raw materials, behaviour change, promoting sustainable choices, etc). However, SEPA's end-of-waste position is unclear about the type of digestate upgrading that is permitted, blocking the route to market.

Generally, end of waste rules make it difficult to keep some materials in use for longer, as once designated as 'waste' there are limitations about how materials can be used. A more flexible and innovation-friendly regulatory system is essential to unlock investment in the R&D and innovative business models required to realistically achieve the outcomes outlined in this Draft Strategy.

Circularity across the supply chain
Recovery of unavoidable food and agricultural waste is possible through maximising industrial symbiosis and utilising innovative biowaste and digestate technology. We need to incentivise investment in biowaste treatment that prioritises nutrient recovery. This needs to be supported by driving significant use of renewable biofertilisers and soil improvers on farms. We need to ensure that we maximise the efficient use of materials, while delivering growth, creating jobs and reducing our reliance on imports (e.g. chemical fertilisers). This will help to decouple sector growth from new resource extraction, generating value from waste, along with associated benefits of reducing pollution and carbon emissions.

Behaviour Change
As it relates to organics recycling, the highest behaviour change priority is ensuring people in businesses, NGOs, households, and public spaces dispose of their waste through the proper channels – disposing of only organic waste in the appropriate food (see also below regarding independently certified compostable items) or garden waste bins and refraining from putting organics in residual or other recycling bins. This reduces contamination and enables the maximum possible volume of source-segregated organic wastes to be treated in the most 'circular' way. It also leaves a 'cleaner' dry recycling stream with reduced contamination from food, making the recycling of plastics and paper etc easier.

Treatment through composting or AD (rather than landfilling or EFW) creates soil-enriching composts and digestates that can be returned to agricultural and horticultural soils as well as renewable energy (if treated through AD). When collected separately and treated properly, waste organic materials can have an almost perfectly 'circular' lifecycle, with co-benefits for soil health and food production – but fully unlocking these benefits requires a change in consumer behaviour. Here's how Scottish Government can support the enabling environment to improve source-segregation of organic waste:
• Capability – consistent education about how to how to properly dispose of food and garden waste (e.g., regular communications to local households and businesses clarifying which items should go in which bins; clear and visual stickers on bins; educational outreach in schools and community groups; etc.)
• Opportunity – making the physical 'binfrastructure' available and accessible to everyone at the point of disposal (e.g., organic waste bins provided to all households, available in all business, public and NGO sector, and public spaces were food and/or plant waste arises) and independently certified compostable liners provided to all households and used in all business, NGO and public sector collections for food-service / food-provision waste, at least where the treatment process organically recycles those liners along with the food waste (see also comments on liners in our answer below on procurement processes). Binfastructure includes bin labels, bin signage and any educational materials associated with informing bin users about which bins to use to appropriately discard of different types and items of waste.

• Motivation – can involve a combination of sticks and carrots. There should be more focus on telling people what happens to the food waste and why it is important that they use the system properly. Conveying environmental, social, economic benefits of proper recycling; potentially offering a small incentive for households who properly recycle organics; small fines for individuals contaminating bins and/or littering (with larger fines and prosecution for more serious, organised waste crime). There is also an opportunity to highlight the financial savings to local authorities for proper recycling, e.g. food waste disposed of in the general waste costs £X/t, whilst food waste in the food waste bin costs £X/t, saving the local authority £Y, and this money can go towards improving public services / limiting council tax increases etc.

Procurement Processes
The draft strategy notes that government will consider new regulations to require public procurement of goods with recycled content, products with bio-based content, products that have been recycled or reused, and products that are recyclable (mechanically, chemically or organically) at end-of-life.

Specifically, we would encourage this to include procurement of recycled organics (e.g., locally produced, waste-derived composts) for landscaping in public green spaces such as parks and gardens. Local authorities should be encouraged to use these materials over virgin equivalents.

Procurement decisions should also consider organic recycling and support the use of independently certified compostable alternatives to traditional products where organic recycling is the most appropriate end-of-life management route and the product functions well during its use phase, e.g. compostable tea bags, coffee bags, sticky labels for individually purchasable fruit and vegetables, and – in settings where use and washing of crockery or other reusable food service ware is impractical and/or uneconomic – compostable food service ware (e.g. compostable bowls, plates and [wooden] cutlery).

Procurement should also choose independently certified compostable liners for kitchen caddies and food waste bins, at least where the treatment process organically recycles those liners along with the food waste (and we could engage with Scottish Government on making an LCA-supported and minimisation of environmentally-persistent microplastics case for also using independently certified compostable liners where an organic recycling facility aims to reject all liner types it receives and send them to a landfill or EfW facility). (Guidance, including decision trees, on compostable products is available at https://www.wrap.ngo/resources/guide/considerations-compostable-plastic-packaging and https://www.compostablebydesign.com/.)

Bio-based content in compostable items should be regarded as an equivalent to recycled content in non-compostable items. This is because bio-based chemicals, materials or other ingredients are from renewable sources (e.g. plants, algae and mycelium) and are produced as part of a 'biological cycle' rather than a 'technical cycle' (see https://www.ellenmacarthurfoundation.org/circulate-products-and-materials). Bio-based content in items can be tested, reported and independently certified; many compostable items contain much bio-based content.

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

Please provide comments in the text box below:

We support greater sharing of the responsibility for products' impacts across the value chain. Historically, the waste sector has been held disproportionately responsible for dealing with managing products' end of life – often put under pressure to deal with issues like PFAS (despite not being involved in product manufacture) and contamination (despite not being responsible for contaminated bins).

By focusing on more shared stewardship across all stages of products' life cycle, from cradle to grave, we can keep items in use for longer and avoid placing unfair burden on those who handle waste materials.

Outcome indicators

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

Yes

If yes, please specify below in relation to the framework as a whole and under the relevant outcome sub-questions below if in relation to specific indicators/outcomes:

See answer to 10d

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

text box for comments:

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

text box for comments:

10c Do you have any comments in relation to the indicators proposed for outcome "Business and entrepreneurs have opportunities to develop circular economy innovations"?

Please provide comments in the text box below:

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

Please provide comments in the text box below:

It is important to evaluate the food waste collections from households, to help inform future changes to the service or where additional support is needed. It is important that food waste collections are not only provided to householders but that the education and communications are effective, and they are actually using them, and the food waste is being organically recycled and does not remain in the residual bin. Measuring the food waste recycling rate is part of this, but this doesn’t give the full picture.

In order to measure the effectiveness of food waste collection, it is important to measure the portion of food waste that remains in the residual waste stream and for targets to be set. 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. The target could be set in relation to ‘baseline’ data and reflect an improvement over a period of time – i.e. after X years, that less than 20% of food waste is in the residual bin.

10e Do you have any comments in relation to the indicators proposed for outcome “The negative environmental impact of our production, consumption and disposal is minimised”?

Please provide comments in the text box below:

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

Please provide comments in the text box below:

10g Do you have any comments in relation to the indicators proposed for outcome “People and communities engage in and benefit from circular activities in a fair and inclusive way”?

Please provide comments in the text box below:

10h Do you have any comments in relation to the indicators proposed for outcome “Circular behaviours are the norm across business and society”?

Please provide comments in the text box below:

Impact assessments

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

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

Please provide comments in the text box below:

The SEA doesn't seem to consider the many benefits that applying composts and digestates to soils can bring. These are well researched and evidenced. ISWA have published a number of reports including 'Benefits of Compost and Anaerobic Digestate when applied to soil' and 'Quantifying the benefits of

applying quality compost to soil' (https://www.iswa.org/biological-treatment-of-waste/?v=79cba1185463). These reports highlight that compost applied to soil increases the soil organic carbon levels (and helps sequester carbon), improves soil structure, reduces erosion, helps maintain soil tilth and acts as a nutrient bank. Applying compost has also been shown to increase microbial biomass and microbial activity. One tonne of green waste derived compost applied to soil over one hectare results in a net CO2 equivalent saving of 143kg/ha/year due to the increases in organic matter. With regard to digestate, the main function is to supply plant nutrients and studies have shown increase crop yields following digestate application.

Increasing the amount of food waste separately collected and sent to AD or composting, will increase the amount of quality compost and digestate that could be available to benefit soils. The SEA should take account of the positive impact on soil.

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 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

Where did you hear about this consultation?

Consultation newsletter, Social media/email of an organisation you follow

If other, please say where::

Evaluation

How satisfied were you with this consultation?

Slightly satisfied

Please enter comments here.:

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

Slightly satisfied

Please enter comments here.:

Annoying that formatting doesn't work!