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

## About us

Consumer Scotland is the statutory body for consumers in Scotland. Established by the Consumer Scotland Act 2020, we are accountable to the Scottish Parliament. The Act defines consumers as individuals and small businesses that purchase, use or receive in Scotland goods or services supplied by a business, profession, not for profit enterprise, or public body.

Our purpose is to improve outcomes for current and future consumers, and our strategic objectives are:

- to enhance understanding and awareness of consumer issues by strengthening the evidence base
- to serve the needs and aspirations of current and future consumers by inspiring and influencing the public, private and third sectors
- to enable the active participation of consumers in a fairer economy by improving access to information and support

Consumer Scotland uses data, research and analysis to inform our work on the key issues facing consumers in Scotland. In conjunction with that evidence base we seek a consumer

perspective through the application of the consumer principles of access, choice, safety, information, fairness, representation, sustainability and redress.

We work across the private, public and third sectors and have a particular focus on three consumer challenges: affordability, climate change mitigation and adaptation, and consumers in vulnerable circumstances.

Consumer Scotland welcomes the opportunity to respond to this consultation on the circular economy and waste route map (CEWRM) to 2030. This work builds on our previous work in this area, including providing oral and written evidence to the Net Zero, Energy and Transport Committee as part of their consideration of the Circular Economy Bill and publishing research on consumer attitudes to decarbonisation.<sup>1</sup>

# Our response

## Summary

The transition to a circular economy is one of the most significant challenges of our time. Providing consumers with clear and accessible information, and supporting them to understand what the most impactful actions and choices are, will be a key part of this transition.

Tackling overconsumption and production by mainstreaming the reduction of consumption, incentivising reuse and repair and promoting sustainable choices will be crucial to making a successful transition to a circular economy.

Consumer Scotland would welcome a greater focus on reducing consumption and reusing resources in the final CEWRM. Supporting consumers in Scotland to move further up the waste hierarchy and make changes to the way in which they consume will be a key part in achieving our net zero targets.

The strategic aims, priority actions and further actions identified in the draft CEWRM have the potential to make an impact at every level of the waste hierarchy along with contributing to a number of the recommendations made by the Climate Change Committee's 2023 Progress Report to Parliament in relation to public engagement and waste prevention.<sup>2</sup>

## Background

Many consumers are increasingly concerned about the environmental impact of the products and services that they buy and are seeking to purchase products and services which minimise harm to, or have a positive effect on, the environment.<sup>3</sup>

However, on average, people in Scotland consume more than double the sustainable level of material use which academics agree would still allow for a high quality of life: around 8 tonnes per person per year.<sup>4</sup> Supporting consumers to buy and waste less will help to reduce the carbon footprint of people in Scotland.

The House of Lords Environment and Climate Change Committee concluded that there was evidence that consumers are concerned about climate change and the environment and that there is a widespread desire for action to be taken. However, they noted that many consumers do not know what the most effective actions are to reduce our emissions and environmental impacts, or appreciate the scale of change that will be needed. The Committee added that while the appetite of people across the UK for climate change action was mixed, the public want clear leadership from government and a coordinated approach to help them adapt.<sup>5</sup>

Research commissioned by Consumer Scotland found that 77% of people in Scotland are concerned about climate change; however, only 34% agreed they know what to do to help

Scotland reach net zero, with 33% disagreeing and a further 34% saying they were unsure.<sup>6</sup> Respondents to the survey cited a lack of information as one of the barriers to positive change.

Almost half (45%) of respondents agreed that their current purchasing decisions are influenced by concerns for the environment, with 61% of respondents saying they will consider the environmental impact of purchases they will make in the future.<sup>7</sup> This suggests that there is a strong starting point for consumers considering the environment when making purchasing decisions, but that there is also scope to improve the extent to which environmental concerns influence consumer purchasing decisions.

The CEWRM has the potential to play a significant role in helping Scotland to achieve net zero targets. Measures in the Route Map are grouped under four strategic aims: 1. Reduce and reuse 2. Modernise recycling 3. Decarbonise disposal 4. Strengthen the circular economy. The strategic aims, priority actions and further actions identified touch on all levels of the waste hierarchy and identify a range of opportunities for consumers to engage in the transition to a circular economy.

The final CEWRM has the potential to deliver against recommendations made by the Climate Change Committee 2023 Progress Report to Parliament on public engagement and waste prevention.<sup>8</sup>

Our response is framed around the 4 strategic aims and will focus on the following areas:

- The importance of maintaining a strong focus on the role of reducing consumption and increasing reuse of resources
- What consumers need to support them to engage in the transition to a circular economy
- Comments on the reduce and reuse, modernising recycling and strengthening the circular economy strategic aims

## **The waste hierarchy**

We note that significant attention is given to recycling and disposal in the draft CEWRM. We welcome the proposed actions identified in these sections. However with around four-fifths (82%) of Scotland's carbon footprint coming from the products and services we manufacture, use, and throw away, supporting consumers in Scotland to focus their actions higher up the waste hierarchy and make changes to the way in which they consume resources will be a key part in achieving our net zero targets.<sup>9</sup>

It is important that the final CEWRM considers all levels of the waste hierarchy and does not focus disproportionately on actions related to recycling and disposal. Consumer Scotland would welcome a greater focus in the final CEWRM on actions higher up the waste hierarchy such as reducing consumption and repairing and reusing existing products.

In the 2023 Progress Report to Parliament, the Climate Change Committee recommended empowering people to make green choices by communicating more clearly the most impactful way that individuals can reduce emissions and supporting people to make these choices.<sup>10</sup>

Consumer Scotland's 2023 survey research identified broad consumer support for measures related to using less and reusing more resources. Respondents were asked for their views on a range of measures related to the use, reuse or disposal of household goods. The highest level of agreement was for the statement: 'there should be more promotion of repair and reuse services, as well as recycling services' (92%). This was closely followed by the statement: 'products should be made so that they are easy to repair, and their components can be re-used' (90%), and the statement: 'companies that sell products should be responsible for taking them back for recycling or disposal at the end of product life' (80%).<sup>11</sup>

Our findings indicate general support from consumers for circular measures relating to household goods. However, there is scope for further action to help inform and support consumers in focusing their actions higher up the waste hierarchy and to make changes to consumption.

## **What do consumers need**

In line with the consumer principle of providing information, consumers should have access to clear and accurate information to help them make informed decisions about the purchases that they make and the actions that they can take to consume more sustainably.

Consumer Scotland's research shows that two-thirds (67%) of consumers state they do not know or are unsure what they need to do to help Scotland reach net zero. There is significant scope for action to build further consumer understanding of decarbonisation and net zero policies and to engage consumers on the specific role they have to play in the changes required. Respondents to the survey cited a lack of information as one of the barriers to positive change.<sup>12</sup>

Consumer Scotland is currently undertaking further research on consumers and net zero, including a focus on the circular economy. We plan to publish the findings of both our quantitative and qualitative projects in the summer. We would welcome any future opportunity to share the findings of this research to support the ongoing development of the CEWRM.

Consumers are currently receiving multiple messages from various sectors, using differing language and approaches. A better coordinated approach, using language that is accessible and understandable to consumers and that is based on an overarching narrative designed to support behavioural changes, would successfully support consumers to understand the action needed by them to transition to a circular economy.

There is a need for governments across the UK to provide better information to consumers to support them to make informed choices that will make a positive impact on meeting

climate change targets. This in line with the consumer principle that such information must be accurate, accessible and useful.

A key task will be to produce messaging that is simple, consistent across sectors and adequately targeted, taking learning from across sectors, particularly where behaviour change campaigns have been successful. It follows that any future messaging should be based on a rigorous evaluation of the success of, and any lessons learned, from previous campaigns, in relation to water use, net zero and energy. It would be useful for any evaluation to be published to inform work across sectors.

Working with trusted organisations, both at a local and a national level, to develop and deliver consistent messaging has the potential to significantly improve the clarity and reach of information campaigns, providing consumers across Scotland with the information that they need. It is important that the impact of such campaigns is evaluated, to support the ongoing improvement and tailoring of key messages.

## **Reduce and reuse**

Tackling overconsumption and production by mainstreaming reuse and repair and incentivising and promoting sustainable choices will be key to the transition to a circular economy.

The development of a product stewardship plan to identify and tackle the environmental impact of priority products could potentially play a significant role in providing consumers with the information required. The plan could assist consumers to understand the impact of these products and support them to reduce consumption and make changes needed to transition to a circular economy.

Consumer Scotland supports taking a prioritised approach to the introduction of environmental charges, focussed initially on those products with the most problematic impacts. In tandem with other measures, this has the potential to support consumers to understand the impact of product choices and allow them to make purchasing decisions which align with their sustainability preferences.

Consumer Scotland's 2023 net zero survey found that more than half of respondents (53%) supported more tax being charged and paid for products which can't be repaired or recycled.<sup>13</sup>

Where any charges for single-use items are introduced, it will be important to avoid potential detriment to consumers who are on low incomes or in vulnerable circumstances. To mitigate against this, there must be accessible and affordable sustainable alternatives available to consumers that fit their needs.

The introduction of a charge for single-use disposable cups has the potential to have significant impact on the number of single-use cups used in Scotland. Currently an estimated 388.7 million single-use cups are used in Scotland each year.<sup>14</sup>

Charges for single-use items should be clear for consumers and information relating to charges should be made accessible in a range of formats in the run up to any charges going live to support consumers to understand the change.

We note the range of pilot schemes aimed at reducing the consumption of single-use cups and the importance of drawing on lessons learned from these, such as the Keep Scotland Beautiful Cup Movement,<sup>15</sup> Transition Stirling Ditching Disposables<sup>16</sup> and Hubbub Starbucks cup charge.<sup>17</sup> In addition to this, reflecting on lessons learned from the single-use carrier bag charge and single-use plastic ban will be valuable.

It is important to acknowledge that charges placed on single-use items are only one part of the solution. Facilitating greater consumer awareness and engagement with reducing consumption of single-use items through sustained behaviour change campaigns will also be crucial. Improving the reuse experience for consumers, which is a stated aim of this routemap, will also require reuse facilities to be easily accessible so that actions to support reuse can be taken as part of consumers everyday activities. The benefits of taking these actions must also be made more clearly visible across all of our communities.

It will also be important to work with manufacturers to continue progress in the development of sustainable products, for example through more research into understanding alternative materials which can replace single-use items, providing incentives to manufacturers to find solutions and exploring technological advances. Developments such as this would remove the need for end consumers to choose more sustainable options, by simply removing less sustainable options from the supply chain. Clarity and consistency of messaging, and policies, is important to allow businesses to plan and to make decisions, which may require investment in infrastructure and in new materials to comply with any new requirements.

The proposal to deliver behaviour change-based approaches focused on sustainable consumption would help support consumers to play their part in Scotland's transition to a circular economy.

Developing restrictions on the destruction of unsold consumer goods has the potential to reduce overproduction and encourage sustainable stock control measures. If delivered effectively, this will support a reduction in use of raw materials and use fewer resources in the production, distribution and destruction processes, meaning that where goods are produced, maximum usage of the materials is obtained.

If restrictions on the disposal of unsold consumer goods are to be phased in by product groups, Consumer Scotland is supportive of the application of life cycle analyses, such as Zero Waste Scotland's carbon metric to guide this phasing.<sup>18</sup> Such an approach would allow prioritisation of products with "high environmental impacts" across their entire lifecycle (resource extraction, use and disposal), as well as those with the highest reuse potential.

It is important to avoid detriment being caused to small businesses, both in their role as consumers purchasing goods and services and as businesses themselves. There will be a

need to provide sufficient time and support to allow businesses to prepare to comply fully with any new measures. The FBS Big Small Business Survey found that almost two fifths (38%) of SMEs in Scotland have limited or no understanding of government targets related to net zero and how these will impact their business, highlighting the need to support small businesses with this transition.<sup>19</sup> Costs and burdens experienced by businesses may be disproportionately felt by SMEs and we note that support will be required for these businesses.

## **Modernise recycling**

The proposed priority action to facilitate a co-design process with Local Government for high quality, high performance household recycling and reuse services has the potential to have a positive impact on consumers. However, it is important that there is flexibility in developing approaches to household waste recycling to make sure that local needs are being met.

Additional support may be needed for local authorities with higher levels of geographic isolation or deprivation. These aspects should be taken into account, to avoid consumers in vulnerable circumstances or local authorities with a more dispersed population base, or a high level of multiple ownership and mixed use buildings, being disproportionately impacted.

We note the relatively limited waste and recycling infrastructure on Scotland's islands, and the potential for these communities to either face high costs in establishing new infrastructure or significant costs, and associated emissions, for transportation to the mainland if there are any major changes to recycling targets.

While acknowledging these challenges, we note that the evidence presented to the Net Zero, Energy and Transport Committee in relation to the Circular Economy Bill suggested that there is more that can be done to support consumers in undertaking effective recycling practices.<sup>20</sup> These include more consistency in what items are collected across local authorities, more consistent use of receptacles and colour coding and better information for consumers about what is collected, by what method and what end uses the material is put to. Consumer Scotland recommends that these approaches should be prioritised before the application of any punitive measures such as household fines.

## **Decarbonising disposal**

The Climate Change Committee has affirmed that the availability of sustainable bioenergy is essential for reaching net zero.<sup>21</sup> It is important that any policies aimed at decarbonising energy from waste fit with the Scottish Government's developing vision for bioenergy in Scotland. Particular focus will be required on the future for existing and new-build anaerobic digestion – especially from food, agricultural and wet wastes – with future, local markets for biomethane such as the whisky industry requiring greater attention if a cost efficient transition to net zero is to be realised.



## **Strengthen the circular economy**

The development of a Circular Economy Strategy, to be refreshed every five years would allow Scotland to react and adapt to technological developments, new challenges and changes in the regulatory landscape. The development of the strategy should keep consumers at the centre of the process, supporting them to make the informed choices that will contribute towards Scotland becoming a circular economy.

In addition to an overarching strategy, having sector level plans, clearly aligned to the strategy and with consistent use of terminology, would help to maximise impact. Consumer Scotland would welcome attention being given to electronics and household appliances, as well as to those products already identified in the CEWRM, as both of these product categories have high value components.

Setting new circular economy targets would be beneficial for consumers. We note that voluntary targets have not been as effective as required for the transition to a circular economy. Scotland has made significant long-term progress towards reaching its waste and recycling ambitions, however, progress has slowed in recent years and there is significant action still required to meet all targets in full.<sup>22</sup>

We note the significant number of related net zero and sustainability targets, plans and strategies that exist both at a Scottish and UK level. It is important that the linkages and interdependencies of these are clear for a range of audiences. In particular, we would draw attention to the need for any circular economy strategy to integrate well with the UK-wide activity in relation to deposit return schemes and extended producer responsibility work to improve the sustainability of packaging. Any actions that have an impact on pricing for consumers must also conform to UK-wide legislation on price marking and we would urge early consultation with Trading Standards bodies in relation to any such measures.

## **Consumer Duty**

The Consumer Duty represents a significant new opportunity to improve outcomes for consumers in Scotland, by requiring public bodies to consider consumer interests when they take strategic decisions. Consumer Scotland will be responsible for issuing guidance to public authorities covered by the Duty.

The Duty will be relevant to all strategic decisions made by relevant public authorities in relation to the CEWRM. Due consideration should therefore be given to achieving the best outcomes for consumers across Scotland when making these decisions.

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- <sup>1</sup> <https://consumer.scot/publications/response-to-the-net-zero-energy-and-transport-committee-on-the-circular-economy-bill/> and <https://www.parliament.scot/chamber-and-committees/committees/committee-official-reports/nzet-07-11-2023?meeting=15534>
- <sup>2</sup> Climate Change Committee (2023) 2023 Progress Report to Parliament. Available at: <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/#recommendations-to-government> accessed 19/02/2024
- <sup>3</sup> CMA (2021) Making environmental claims on goods and services. Available at: <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services> - accessed 15/02/2024
- <sup>4</sup> Zero Waste Scotland - Circular Economy Bill: Continuing Scotland's sustainable journey available at: [https://assets.website-files.com/5e185aa4d27bcf348400ed82/6399cc007f63ad41fae0b240\\_CGR%20Scotland.pdf](https://assets.website-files.com/5e185aa4d27bcf348400ed82/6399cc007f63ad41fae0b240_CGR%20Scotland.pdf) accessed 14/02/2024
- <sup>5</sup> HL Paper 64. 1st Report of Session 2022–23. In our hands: behaviour change for climate and environmental goals
- <sup>6</sup> [Consumer Scotland \(2023\) Consumers and the transition to net zero](https://consumer.scot/media/vzig1umd/consumers-and-the-transition-to-net-zero.pdf). Available at: <https://consumer.scot/media/vzig1umd/consumers-and-the-transition-to-net-zero.pdf>
- <sup>7</sup> [Consumer Scotland \(2023\) Consumers and the transition to net zero](https://consumer.scot/media/vzig1umd/consumers-and-the-transition-to-net-zero.pdf). Available at: <https://consumer.scot/media/vzig1umd/consumers-and-the-transition-to-net-zero.pdf>
- <sup>8</sup> Climate Change Committee (2023) 2023 Progress Report to Parliament. Available at: <https://www.theccc.org.uk/publication/2023-progress-report-to-parliament/#recommendations-to-government> accessed 19/02/2024
- <sup>9</sup> Zero Waste Scotland - How is Scotland's carbon footprint changing? available at: <https://www.zerowastescotland.org.uk/resources/how-scotlands-carbon-footprint-changing> - accessed 09/08/2023
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- <sup>11</sup> Consumer Scotland (2023) Consumers and the transition to net zero. Available at: <https://consumer.scot/publications/consumers-and-the-transition-to-net-zero/> - accessed 14/02/2024
- <sup>12</sup> Consumer Scotland (2023) Consumers and the transition to net zero. Available at: <https://consumer.scot/publications/consumers-and-the-transition-to-net-zero/> - accessed 15/02/2024
- <sup>13</sup> Consumer Scotland (2023) Consumers and the transition to net zero. Available at: <https://consumer.scot/publications/consumers-and-the-transition-to-net-zero/> - accessed 14/02/2024
- <sup>14</sup> Zero Waste Scotland (2022) Consumption of Single-use Disposable Beverage Cups in Scotland. Available at: <https://cdn.zerowastescotland.org.uk/managed-downloads/mf-jdg574yh-1695724903d> - accessed 11/03/2024
- <sup>15</sup> Keep Scotland Beautiful Cup Movement, available at: <https://www.keepsotlandbeautiful.org/cup-movement/> accessed 27/02/2024
- <sup>16</sup> Transition Stirling Ditching Disposables. Available at: <https://www.transitionstirling.org.uk/ditching-disposables> accessed 27/02/2024
- <sup>17</sup> Hubbub Starbucks 5p coffee cup charge. Available at: <https://hubbub.org.uk/starbucks-5p-cup-charge> accessed 27/02/2024
- <sup>18</sup> Zero Waste Scotland – carbon metric publication. Available at: <https://www.zerowastescotland.org.uk/resources/carbon-metric-publications> accessed 14/02/2024
- <sup>19</sup> FSB (2023) Big Small Business Survey. Available at: <https://www.fsb.org.uk/resources-page/big-small-business-survey.html> accessed 14/02/2024
- <sup>20</sup> [Stage 1 | Scottish Parliament Website](#)
- <sup>21</sup> Climate Change Committee (2020) [The Sixth Carbon Budget](#)
- <sup>22</sup> SEPA Waste Data for Scotland. Available at: [Waste data for Scotland | Scottish Environment Protection Agency \(SEPA\)](#) accessed 19/02/2024