

REPORT TO: NEIGHBOURHOOD SERVICES COMMITTEE – 22ND AUGUST 2022

REPORT ON: DELIVERING SCOTLANDS CIRCULAR ECONOMY: PROPOSED BILL AND ROUTEMAP TO 2025 & BEYOND CONSULTATIONS

REPORT BY: EXECUTIVE DIRECTOR OF NEIGHBOURHOOD SERVICES

REPORT NO: 199 2022

1.0 PURPOSE OF REPORT

- 1.1 This report provides information to the committee on Dundee City Council's response to the Scottish Governments recent consultations on Delivering Scotland's Circular Economy – Proposed Circular Economy Bill and Route Map to 2025 & Beyond.

2.0 RECOMMENDATIONS

- 2.1 It is recommended that the committee approve the contents of this report for submission.

3.0 FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications directly associated with this report.

4.0 BACKGROUND

- 4.1 The Scottish Government has published two simultaneous consultation proposals in relation to;

The Circular Economy (CE) Bill [Delivering Scotland's circular economy - proposed Circular Economy Bill: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/consultations/bills-and-legislation/pages/delivering-scotland-s-circular-economy-proposed-circular-economy-bill-consultation.aspx)

The Routemap to 2025 Targets [Delivering Scotland's circular economy: A Route Map to 2025 and beyond - Scottish Government - Citizen Space \(consult.gov.scot\)](https://www.gov.scot/publications/consultations/bills-and-legislation/pages/delivering-scotland-s-circular-economy-a-route-map-to-2025-and-beyond.aspx)

The date of submission for both consultations is set at the 22nd of August 2022.

- 4.2 Both consultations cover a range of proposed measures that are complementary and in the case of the Circular Economy Bill, this is an updated response following the original submission that the council submitted on the 19th of December 2019 (Article V of the minute of meeting of this Committee of 24th February 2020 refers - Report No [36-2020](#)).
- 4.3 The outcomes of these consultations, if transposed into legislation and activities, have the potential to significantly change the way that Local Authorities manage waste and resources. Further detailed consultation is expected in relation to these policy areas during the current parliamentary session.

5.0 UPDATED CIRCULAR ECONOMY PROPOSED BILL CONSULTATION

- 5.1 The overall approach for a circular economy is that it is an alternative proposed approach to the traditional “take, make and dispose” linear economy. It is one in which resources are kept in use for as long as possible, the maximum value is extracted from them whilst in use and the products and materials are then recovered at the end of their life cycle.
- 5.2 This circular economy approach to production and consumption of materials follows the principles of the waste hierarchy, which describes the order of preference for actions to manage and reduce waste – from waste prevention through to waste disposal.
- 5.3 A circular economy has benefits for the environment, the economy and the local community as waste is reduced and new markets and local employment opportunities are created.

- 5.4 The Scottish Government's circular economy objectives can be summarised as:
- Reducing waste;
 - Reducing litter;
 - Reducing carbon and resource footprint;
 - Increasing recycling rates and quality of recyclate; and
 - Maximising economic opportunities.
- 5.5 The proposed circular economy bill puts forward measures that require primary legislation, recognising that these are complimented by other legislative and non-legislative actions in order to achieve the stated objectives. The consultation seeks responses to a number of questions based around the themes of:
- Reduce
 - Reuse
 - Recycle
 - Improving enforcement
 - Assessing impacts of bill proposals
 - Proposals for secondary legislation
- 5.6 A full summary of the consultation questions and responses submitted by Dundee City Council can be found in Appendix 1.
- 6.0 ROUTE MAP TO 2025 & BEYOND CONSULTATION**
- 6.1 Scotland has made significant long-term progress towards its ambitious 2025 waste and recycling targets. Emissions from the waste and resources sector have reduced by almost three quarters over the past 20 years. However, progress has slowed in recent years.
- 6.2 The Scottish Government's Programme for Government 2020-21 and Scotland's Climate Change Plan update set out determination to accelerate progress, and commitment to develop a Route Map to reduce waste and meet Scotland's targets.
- 6.3 Progress to date has seen recent and forthcoming legislation such as the single-use plastic ban, implementation of Scotland's forthcoming Deposit Return Scheme, reform of Extended Producer Responsibility for packaging and a £70 million Recycling Improvement Fund. However, it is clear that further system-wide changes are required if Scotland is to meet the 2025 targets in full and deliver required emissions reductions.
- 6.4 Building on measures already in place or underway, the consultation proposes a range of additional legislative and non-legislative measures that can positively contribute to the delivery of the targets and make progress towards carbon reduction. Proposals are grouped into seven change packages, which span action across the whole circular economy.
- 6.5 The consultation seeks views on the strategic approach to meeting Scotland's goals between now and 2025 and looking beyond to 2030. The proposed packages are:
- Package 1: Promote responsible production, consumption and reuse,
 - Package 2: Reduce food waste,
 - Package 3: Improve recycling from households,
 - Package 4: Improve recycling from commercial businesses,
 - Package 5: Embed circular construction practices,
 - Package 6: Minimise the impact of disposal and,
 - Package 7: Cross-cutting measures.
- 6.6 A full summary of the consultation questions and responses submitted by Dundee City Council can be found in Appendix 2.

7.0 POLICY IMPLICATIONS

- 7.1 This report provides detail of the Council's formal responses to the Scottish Government's updated Circular Economy Consultation and the Routemap to 2025 Targets consultation. The report does not relate to development of a policy, strategy, procedure or service and, as such, has therefore not been subject to an integrated assessment of any impacts on Equality and Diversity, Fairness and Poverty, Environment and Corporate Risk.

8.0 CONSULTATIONS

- 8.1 The Council Management Team have been consulted in the preparation of this report and agree with its contents.

Elaine Zwirlein
Executive Director of Neighbourhood Services

Tony Boyle
Head of Environment

22nd August 2022

Delivering Scotland's Circular Economy A Consultation on Proposals for a Circular Economy Bill



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☒ Organisation

Full name or organisation's name

Dundee City Council

Phone number

07787221651

Address

Neighbourhood Services
5 City Square,
Dundee

Postcode

DD1 3BA

Email Address

charlie.devine@dundeecity.gov.uk

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If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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

- ☒ Yes

☐ No

Questionnaire

Question 1

Do you agree there should be a duty on Scottish Ministers to publish a Circular Economy Strategy every 5 years?

☒ Yes

☐ No

☐ Neither agree or disagree

Question 2

Do you have any further thoughts on a statutory duty to produce a Circular Economy Strategy?

The strategy is required to set out the initial actions, identify key stakeholders and be used to measure progress and success against a defined set of actions and by making this a statutory duty the emphasis, importance and drive will be maintained.

Question 3

Do you think we should take enabling powers to set statutory targets in relation to the circular economy?

☒ Yes

☐ No

☐ Neither agree or disagree

Question 4

Do you have any comments in relation to proposals to set statutory targets?

Given the nature and urgency of the climate emergency, statutory targets will be required to move forward at pace in a consistent and meaningful way. Local authorities will play a key part in this and will require adequate funding to act as both the enabler and regulator.

Question 5

Should a dedicated Circular Economy public body be established?

- ☒ Yes
- ☐ No
- ☐ Neither agree or disagree

Question 6

Please provide evidence to support your answer to question 5?

There will be a requirement for a body to oversee the transition to a circular economy that is publicly accountable, not easily influenced by external factors and able to provide support across all stakeholder groups.

Question 7

If a Circular Economy public body were to be established, what statutory functions should it fulfil?

They should be able to set binding targets, monitor progress against targets, hold the various sectors to account alongside the dispersal of funding dependent on the requirements of the stakeholders.

Question 8

Do you agree that the Scottish Government should have powers to ban the destruction of unsold durable goods?

- ☒ Yes
- ☐ No
- ☐ Neither agree or disagree

Question 9

Do you have any comments in relation to proposals to ban the destruction of unsold durable goods?

All goods that are manufactured using precious resources should be used and / or re-distributed to minimize the environmental impact of the goods and should be re-used and only disposed when the goods are no longer fit for purpose or ready for another use.

Question 10

Are there particular product categories that you think should be prioritised?

Textiles, furniture, prepackaged dry food, electrical items, building products are all everyday waste categories that should be prioritised.

Question 11

Are there product categories that should be excluded from such a ban?

Items such perishable food stuffs, prescription drugs and anything that could create a health issue if used without care. Other preventative measures would be more appropriate for these types of material to eliminate or reduce the volumes that require treatment and disposal.

Question 12

The previous consultation showed broad support for the proposal that Scottish Ministers should have the power to set charges for environmentally harmful items, for example single-use disposable beverage cups. Is there any new context or evidence that should be taken into account in relation to this proposal?

No further comment.

Question 13

Do you have any further comments on how a charge on environmentally harmful items should be implemented?

Charges should be made at as early a stage as possible to limit the items from being presented to the consumer and possibly encourage alternatives. Charges should reflect the environmental damage created by the items to encourage more environmentally sustainable products being brought on to the market.

Question 14

The previous consultation showed broad support for the proposal that Scottish Ministers should have the power to require mandatory public reporting of unwanted surplus stock and waste. Is there any new context or evidence that should be taken into account in relation this proposal?

No further comment.

Question 15

The previous consultation showed broad support for the proposal that food waste should be a priority for regulations. Is there any new context or evidence that should be taken into account in relation this proposal?

The context remains the same and it should be noted that food safety and public health should be the main priority when it comes to the collection and distribution of surplus food takes alongside careful consideration of the other environmental impacts of alternative waste treatments.

Question 16

Are there other waste streams that should be prioritised?

Anything that could be considered as single use should be prioritised as a matter of course.

Question 17

The previous consultation showed broad support for the proposal that Scottish Ministers should have powers to place additional requirements on local authorities in order to increase rates and quality of household recycling. Is there any new context or evidence that should be taken into account in relation to the proposal?

In line with our previous response, we continue to be of the view that any additional requirements placed on local authorities by the Scottish Government are likely to incur additional capital and revenue costs to implement and manage the required changes at a time of considerable budgetary pressure. Furthermore, any such mandated requirements will not have any guaranteed outcomes relating to recycle quantity and quality due to the voluntary nature of householder participation in recycling schemes.

Question 18

The previous consultation showed broad support for the principle that there should be greater consistency in household recycling collections. Is there any new context or evidence that should be taken into account?

The forthcoming changes in waste composition and impacts associated with the introduction of a DRS will change the shape of current recycling services and therefore this and other future changes will need to be considered when re-casting the charter.

Question 19

The previous consultation showed broad support for the principle of moving away from the current voluntary approach to Scotland's Household Recycling Charter towards a more mandated approach, whereby implementation of the Charter and its supporting Code of

Whilst the principle of a consistent approach across Scotland for recycling collections is welcomed, mandating such an approach is not. Only where Local Authorities are free to implement an approach which is aligned to the consistent methodology but which also takes heed of local circumstances and requirements can there be any successful service implementation. In mandating a change for all Local Authorities regardless of the financial impact (capital outlays and ongoing revenue costs), contractual impacts (changes to material mixes and collection frequencies) and local suitability, there exists the potential for widespread disruption and service failure – particularly noting the fact that mandatory requirements for local authorities do not, in themselves, translate into improved recycling performance or quality.

Practice becomes a statutory obligation. Is there any new context or evidence that should be taken into account?

Question 20

Do you agree that Scottish Ministers should have the power to introduce statutory recycling targets for local authorities?

- ☒ Yes
☐ No
☐ Neither agree or disagree

Question 21

If you agree with Q.20, do you agree that Scottish Ministers should have the power to introduce and set financial incentives for local authorities to meet these targets, or penalties should these targets not be met?

- ☒ Yes
☐ No
☐ Neither agree or disagree

Question 22

Please explain your answer

Although we agree in principle with the statutory obligation, the services involved in delivering the requirement will require to be fully funded to provide a comprehensive and sustainable service and this will include capital and revenue increases to meet any statutory obligations.

Question 23

The previous consultation showed broad agreement that householders' existing obligations are not sufficient. Is there any new context or evidence that should be taken into account?

We continue to be of the view that further research is required to fully inform this position as the underlying reason for non-compliance and lack of participation in recycling services within some sectors of the population are not clear and any statutory obligations may lead to unintended consequences if not fully understood and suitable actions taken to make any changes workable.

Question 24

Do you agree with the principle that local authorities should have more powers to enforce recycling requirements?

- ☒ Yes
- ☐ No
- ☐ Neither agree or disagree

Question 25

Please add any additional comments

Local authorities should have carefully considered enforcement powers in relation to waste and recycling that encompasses the authorities need to drive forward recycling and as a deterrent to householders that are unwilling or unable to comply with recycling requirements and only used as a last resort and this will require further research and a durable enforcement model to be successful.

Question 26

Are there further powers, if any, for Scottish Ministers, and/or local authorities, that should be considered in order to incentivise positive household behaviours, to support waste reduction and increased recycling in Scotland?

Current legislation such as the Environmental Protection Act 1990 and subsequent updates have powers that have yet to be enacted in Scotland to compel householders to fully comply with the requirements of the Waste Collection Authorities and these backed with a broad range of incentives including financial incentives should be made available.

Question 27

Are there any other legislative measures that you consider Scottish Government should take to strengthen recycling and reuse at a household level, helping accelerate the rate and quality of household recycling in Scotland?

- ☒ Yes
- ☐ No
- ☐ Neither agree or disagree

Question 28

Please add any additional comments

Fully utilising the current legislative requirements, providing proper financial support & incentives and removing the confusion and mixed messages that currently exist across the various local authority collection systems would in part accelerate the rate and quality of recycling. Confusion exists with the multiple systems, differing terms and language used by the various bodies including the Scottish Govt and support agencies and this along with the various myths around what happens to waste require to be addressed.

Question 29

Do you agree with the principle of Scottish Ministers, and local authorities if appropriate, taking on the necessary powers to explore and trial commercial waste zoning approaches in Scotland?

- ☒ Yes
☐ No
☐ Neither agree or disagree

Question 30

Please add any additional comments:

Commercial waste zoning will increasingly become more appropriate with the drive to preserve the quality and appearance of our town centres and local shopping areas as well as encouraging participation in recycling and responsible & sustainable waste management practices.

The Government will require to consult with the various service providers to ensure that this is applied consistently and that any powers awarded to the local authorities are fully funded to ensure proper regulation and enforcement.

Question 31

The previous consultation showed broad support for the proposal that Scottish Ministers should have the powers to introduce a new fixed penalty regime for littering from vehicles. Is there any new context or evidence that needs to be taken into account?

We continue to support this approach.

Question 32

The previous consultation showed broad support for the principle that the registered keeper of a vehicle bears primary responsible for offences such as littering from or in relation to their vehicle (for example by passengers or people using that vehicle at that time). Is there any new context or evidence that needs to be taken into account?

We continue to support this approach.

Question 33

The previous consultation showed broad support for the principle that enforcement authorities should be given powers to seize vehicles linked to waste crime. Is there any new context or evidence that should be taken into account?

No additional comments.

Question 34

Taking into account the accompanying EQIA, are there any additional likely impacts the proposals contained in this consultation may have on particular groups of people, with reference to the ‘protected characteristics’ listed above?

Any future changes to collection systems and duties placed upon householders will need to be well thought out and designed to meet the needs of disabled and elderly residents to ensure maximum participation for all citizens with minimum intervention from the local authorities to enable the effective operation of high performing collection systems.

Question 35

Taking into account the accompanying BRIA, 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?

Given the potential changes and the enabling status of the proposed bill it is likely that additional costs will be incurred to fully comply and this should be actively mitigated by maximising the use of technology, as well increasing both the quantity and quality of the recycle collected.

Question 36

Taking into account the accompanying CRWIA, do you think that the proposals contained in this consultation are likely to have an impact on children’s rights and wellbeing?

From the CRWIA provided any impacts are limited and should be positive in the long term as today’s young people become tomorrow’s adults and principle beneficiaries of any positive changes.

Question 37

Taking into account the accompanying ICIA, 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?

Any influence on Island and remote communities is likely to be in the form of additional costs and economies of scale in comparison to the more densely populated areas and this issue is comparable to the current situation with waste management and recycling. The careful use of exemptions and subsidies should be considered on a case by case basis to minimise costs and ensure a comparable and compliant system to that elsewhere in Scotland.

Question 38

Taking into account the accompanying Fairer Scotland Assessment summary template, do you think that the proposals contained in this consultation are likely to have an impact in relation to the Fairer Scotland Duty?

As outlined in the summary, the introduction of the Bill itself is unlikely to have an impact but the subsequent secondary legislation and measures are likely to have an impact in some sections of the population in terms of the inclusion of fines for non-compliance and the introduction of charges for single use items and these will require separate assessments as the measures are progressed through the legislative system and subsequent consultations.

Question 39

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

In line with our previous response we continue to be of the view that all of the proposals will have a positive effect on the environment, by increasing public awareness and recycling and promoting sustained behavioural change.

Question 40

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

No further comments.

APPENDIX 2 – DCC RESPONSE TO ROUTE MAP TO 2025 & BEYOND CONSULTATION

Delivering Scotland's Circular Economy: A Route Map to 2025 and beyond



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☒ Organisation

Full name or organisation's name

Dundee City Council

Phone number

07787221651

Address

Neighbourhood Services, 5 City Square,
Dundee

Postcode

DD1 3BA

Email Address

Charlie.devine@dundeecity.gov.uk

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but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- ☒ Yes
- ☐ No

Questionnaire

Question 1

To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use? Please provide evidence to support your answer if possible.

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

Fully supportive of current and proposed actions under this package. Early progress in this area of work has shown that there is a key public interest however there needs to be the financial support for infrastructure and communications.

Statutory targets need to be carefully considered to avoid unintended consequences and suitable funding will be required to assist Local Authorities to achieve these.

Question 2

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

The Route Map covers a wide range of targets and actions aimed at sustainable production and re-use. In addition, it should outline incentives and programmes of engagement to drive public attitudes, behaviour and participation.

Question 3

To what extent do you agree with the measures proposed in this package to reduce food waste? Please provide evidence to support any identified opportunities and challenges associated with the measures in your answer if possible.

- ☒ Strongly agree

- ☐ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

We strongly agree with both current and proposed actions, in particular those encouraging householders to reduce food waste. Additional work should focus on campaigns educating the public about the cost of food waste and sell by/use by dates to reduce confusion.

Question 4

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

Proposed actions should apply across the whole of Scotland and not be confined to densely populated areas to ensure fairness and consistency. Financial support should also be provided to ensure a Scotland wide approach.

Question 5

To what extent do you agree with the measures proposed in this package to improve recycling from households? Please provide evidence to support your answer if possible

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

We agree with the proposals in principle however more information is required on statutory obligations, consequences of non-compliance and the financial support to enable Local Authorities to take forward these obligations. In particular, there needs to be more information provided on the requirement to collect garden waste separately by 2023 and whether the Controlled Waste Regulations will be amended to remove the right to charge for this. The Scottish Government will be required to make necessary financial provision to all authorities, both to align the deficit that will be created by formalising this provision, from what is currently a service which is chargeable to householders to one that each local authority will be obliged to provide, and to ensure that authorities are sufficiently resourced to meet increasing significant demands created by this proposed policy.

Question 6

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

Proposals to maximise measures already in place as well as bringing in more stringent measures. Specific measures to tackle low uptake and lack of participation in the form of either incentives or direct charging for waste services.

Question 7

To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses? Please provide evidence to support your answer if possible.

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

We agree with the proposal to improve recycling from commercial businesses but these measures should be applied consistently across the service providers in order that local authorities, as the provider of last resort, are not left with the burden of providing services in areas where commercial operators are unable to meet the requirements due to cost or logistical restrictions.

Question 8

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

Consistency, regulation and compliance remain major obstacles for the improvement of recycling from commercial premises at the moment and should be the focus of any future measures.

Question 9

To what extent do you agree with the measures proposed in this package to embed circular construction practices? Please provide evidence to support your answer if possible.

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree

☐ Strongly disagree

We agree with measures as presented. This is a fairly complex industry in terms of waste prevention, reduction and recycling with a very diffuse supply chain and the focus should remain on ensuring that the client sets out requirements from the beginning of the projects.

Question 10

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

More emphasis or measures on waste management within the construction industry at the design, planning and architectural stages. Further use of Site Waste Management Plans. Measures or actions aimed at refurbishment of existing buildings.

Question 11

To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste? Please provide evidence to support your answer if possible.

- ☐ Strongly agree
☒ Agree
☐ Neither agree or disagree
☐ Disagree
☐ Strongly disagree

We agree with the measures outlined as part of the journey towards net zero. There requires to be more efficient use of new & existing EfW facilities and a reduction in carbon emissions through better utilisation of feedstocks, improved efficiency of heat capture and the introduction of carbon capture technologies.

However, Local Authorities are amongst the principal users of EfW with many tied into different and complex long term contractual arrangements. This should be taken into consideration when developing any sector led or residual waste plan. Local Authorities are the most vulnerable and least able to deal with any new financial burdens created as a result of an ETS therefore, time should be given to for local authorities and their service providers to develop plans to minimise emissions from fossil materials .

Question 12

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

Landfill should be included within the Emission Trading Scheme to account for the carbon emissions and other pollutants emitted from the practise. A UK wide ban on biodegradable and combustible material may also be required to drive materials up the waste hierarchy and ensure that landfilling/waste export does not become a cheaper more favourable option. There should also be several supplementary policies introduced to encourage the decarbonisation of the waste stream such as incentives to utilise the uptake of district heating to help offset the process as well as the market development of reprocessing capacity for low grade/value materials such as plastic films, pots, tubs & trays etc.

Question 13

To what extent do you agree with the measures proposed in this package to support action across the circular economy? Please provide evidence to support your answer if possible.

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

We agree that to support action across the circular economy, there needs to be strong governance and support in place to help Local Authorities to tackle behaviours and shift attitudes to assist with meeting targets. Further research is particularly welcomed into what interventions will encourage householders into participating in local recycling systems and these should be evaluated and considered by Scottish Government as part of a national approach.

It is imperative that quality data is collected to monitor progress which will be enabled by a digital waste tracking service and compositional waste analysis. However, the impact of forthcoming legislation such as DRS and EPR has the potential to completely change the composition of each waste stream collected with no steer on level and speed of uptake, therefore any analysis would be required to be repeated regularly.

Question 14

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

No further comment.

Question 15

To what extent do you agree with the principles proposed to underpin future circular economy targets? Please provide evidence to support your answer if possible.

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree or disagree
- ☐ Disagree
- ☐ Strongly disagree

New targets should be set out for beyond 2025 and will ultimately be informed by progress up to that point. These should however align with national and even global commitments such as achieving net zero by 2045, focus on sustaining a circular economy and ensure a joined-up approach with other countries.

Question 16

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

It is anticipated that the majority of the proposals contained here would affect all communities across Scotland without prejudice and would not adversely affect any particular group of people. However, where specific interventions contained within the routemap and relating to charging are introduced, further consultation and impact assessments would require to be undertaken.

Question 17

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

As above.

Question 18

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

No further comment.

Question 19

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

The noted intention to consider statutory targets and services alongside the introduction of an ETS is highly likely to increase costs and burdens on local authorities as both capital (bins, vehicles, infrastructure) and revenue (staff, communications costs) expenditure would be required in order for councils to ensure compliance with the requirements. Additionally, the impacts of the forthcoming DRS and EPR on kerbside recycling collections will also require to be assessed. Until such time as reprocessing capacity is generated within Scotland to allow for circularity of recycling, local authorities will remain subject to the market forces of the recycle reprocessing market worldwide and, as such, are likely to be financially impacted. It should also be recognised that local authorities must retain the ability to make decisions based on local circumstances and requirements for services to function well.

Question 20

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

It is anticipated that all of the proposals and packages would have a positive effect on the environment through improving recycling by householders & businesses, minimising the impacts of disposal, embedding circular practises and promoting responsible consumption.

Consideration should be given to high density urban areas where deprivation, poor quality housing stock, multi occupancy households and a lack of infrastructure impact the ability to provide quality recycling facilities and where participation is historically low.