

Scotland's Circular Economy and Waste Route Map to 2030 Consultation

Analysis of consultation responses

August 2024

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Executive Summary

Introduction

The Scottish Government published an updated draft '[Circular Economy and Waste Route Map to 2030](#)' in January 2024. This incorporated findings from a consultation on a previous draft, alongside further complementary research and updated impact assessments. The updated draft Route Map has been streamlined from seven packages to four strategic aims, each with priority actions and further actions: Reduce and reuse: Modernise recycling; Decarbonise disposal; and Strengthen the circular economy.

The Scottish Government sought views on the revised Route Map through a public consultation exercise, which took place from 18 January 2024 to 15 March 2024. The consultation contained 24 questions about the proposals, comprising eight closed and 16 open questions. In total, 156 consultation responses were received from individuals, and organisations across a variety of sectors, including waste management companies, retail and packaging organisations and local authorities.

Overview of findings

A high-level summary of responses to the closed questions in the consultation is presented in the table below; it sets out the percentage of respondents who answered 'agree' or 'strongly agree' when asked the extent to which they agreed with the proposed actions set out under each of the strategic aims.

Summary of level of support for each set of actions

Actions	% of those answering who agree or strongly agree
Reduce and reuse: priority actions	77%
Reduce and reuse: further actions	71%
Modernise recycling: priority actions	76%
Modernise recycling: further actions	76%
Decarbonise disposal: priority actions	78%
Decarbonise disposal: further actions	78%
Strengthen the circular economy: priority actions	76%
Strengthen the circular economy: further actions	81%

There were consistently high levels of support for the actions within the four strategic aims, ranging from 71% for the Reduce and reuse further actions, to 81% for Strengthen the circular economy further actions.

More nuance was provided in responses to the open-ended questions, with respondents setting out the reasons they either agreed or disagreed with measures, raising questions or concerns about some of the proposed actions, or providing caveats to their support.

Strategic Aim 1: Reduce and reuse

Many respondents expressed broad approval of the actions under this strategic aim; they were described as “sensible”, “well-considered” and “important”. Others welcomed the inclusion of Reduce and reuse as the first and most prominent strategic aim in the Route Map, noting that this embraces the ethos of a circular economy and reflects the principles of the waste hierarchy.

However, some general concerns were also raised about actions under the Reduce and reuse strategic aim. A few respondents described the proposed measures as vague and non-specific, and others viewed them as lacking sufficient urgency and ambition. Some respondents argued that the proposed actions place too much responsibility on the individual consumer and suggested that more measures should be targeted at addressing the actions of producers, retailers, manufacturers and businesses.

In terms of actions targeted at driving responsible consumption, production and re-use, plans to develop and publish a Product Stewardship Plan were broadly supported, with respondents welcoming the emphasis on environmental accountability throughout the supply chain. The majority of further actions were also well received; however, there was some opposition to the potential introduction of charges for problematic products and single use paper cups, particularly from those in the retail and packaging sector.

Respondents from a mix of sectors supported the actions aimed at reducing food waste, recognising the scale of the issue and describing food waste reduction as critical in reducing carbon emissions and the environmental impact of food production. However, some raised concerns about the additional cost, resource and administrative burdens that mandatory reporting for food waste and surplus could impose on the retail and hospitality sector, cautioning that small businesses may struggle to meet the requirements.

Comments about the actions specific to the construction sector were largely supportive in nature, although some respondents flagged potential barriers to developing regional hubs and networks for the reuse of construction materials, such as securing appropriate sites, licensing matters and quality assurance of reused materials.

Strategic Aim 2: Modernise recycling

Some respondents expressed general approval of the actions under the Modernise recycling strategic aim, with a few welcoming the Route Map’s ambition for Scotland to become a world leader in recycling.

However, one of the main overarching themes under the Modernise recycling strategic aim was questions over how the proposed actions will be resourced; concerns were raised that actions may be difficult to implement due to the financial challenges facing the public sector and lack of available local authority funding and capacity. Additionally, some respondents emphasised the importance of ensuring that the proposed actions do not undermine or interfere with the implementation of legislation related to Extended Producer Responsibility and the Deposit Return Scheme.

Many comments on the household recycling actions were positive, with respondents welcoming the focus on high quality, co-designed services. Several respondents expressed support for a collaborative and multi-method service design approach involving a broad spectrum of stakeholders. Plans to develop a statutory Code of Practice and introduce end destination public reporting of recycling were welcomed, with respondents describing these as key drivers in increasing household recycling rates. However, there were mixed views on the introduction of statutory recycling and reuse performance targets and the measures aimed at stricter enforcement.

The actions focused on commercial recycling were well received, with respondents agreeing that the measures will help to address gaps in data, enhance service provision and increase compliance with requirements. However, it was noted that any measures taken to improve commercial waste recycling must be underpinned by adequate resources and support for businesses.

Strategic Aim 3: Decarbonise disposal

Some respondents welcomed the inclusion of measures which help to minimise environmental impacts of residual waste materials that cannot be avoided, reused or recycled, while others felt that the actions in the Route Map should focus solely on cutting consumption and avoiding waste at source.

Several respondents welcomed plans to develop and deliver a long-term Residual Waste Plan and a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector, noting that these plans will provide strategic direction and lead to more informed decision-making. However, there were mixed views on the proposal to support the inclusion of Energy from Waste in the UK Emissions Trading Scheme, with some respondents expressing support and others raising financial and logistical concerns. A few questioned whether the Energy from Waste should be considered within the Route Map at all, arguing that incineration is not part of a circular economy. The other further actions within this strategic aim were broadly supported by respondents.

Strategic Aim 4: Strengthen the circular economy

While the overall ambitions of the Strengthen the circular economy strategic aim were broadly welcomed, some respondents felt the actions in this section lacked detail, specificity and ambition.

Most respondents welcomed the proposal to publish a Circular Economy strategy every five years, but a small number considered this a low priority, arguing that the implementation of direct producer responsibility measures (e.g. regulation) is of greater importance than producing a strategy document. Some suggested areas they felt the strategy should cover.

There was broad support for the proposal to set new circular economy targets beyond 2025, with some reflecting on how targets will help to drive action and consistently monitor progress. There was strong support for the further actions aimed at research, data and evidence, sustainable procurement and skills and training.

1. Introduction

1.1 The policy context

In 2020's [Climate Change Plan update](#), the Scottish Government set out a 2045 vision for a circular economy, where Scotland reduces the demand for raw material in products; encourages reuse and repairs; and recycles waste and energy to maximise the value of any waste that is generated. This vision set out that by 2045, Scotland's cultural, social and business norms will be driven by a focus on Responsible Production, Responsible Consumption, and Maximising Value from Waste and Energy.

To drive progress towards its circular economy goals, Scotland has had a set of waste and recycling targets in place for over the past decade, spanning the waste hierarchy to 2025. Scotland has made good long-term progress towards reaching these ambitions. To accelerate change, in May 2022, the Scottish Government published a first consultation, '[Delivering Scotland's Circular Economy: Route Map to 2025 and Beyond](#)'¹, which laid out a strategic approach to transform how we produce, consume, and manage Scotland's resources, and maximise progress towards waste, recycling and emission reduction objectives. The consultation set out a range of proposals across the resources and waste system, and sought views on the feasibility and ambition of these proposals.

In line with the 2023-24 [Programme for Government](#), the Scottish Government published an updated draft '[Circular Economy and Waste Route Map to 2030](#)' for a second consultation in January 2024. This reflected findings from the first consultation, alongside further complementary research and updated impact assessments. Building on measures already in place or underway - including a ban on problematic single-use plastic items, a ban on disposable vapes, introduction of extended producer responsibility for packaging and a £70 million investment in local authority recycling infrastructure and further expansion of other producer responsibility schemes for key product types such as WEEE (Waste Electrical and Electronic Equipment) - the Route Map is designed to drive progress on three key fronts:

1. Setting the strategic direction and laying foundations for how the system-wide vision for Scotland's circular economy from now to 2030 will be delivered.
2. Setting out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy. In the Route Map the Scottish Government acknowledges the progress that has been made against the existing 2025 waste reduction and recycling targets, the areas where progress has fallen short, and the lessons that can be learnt as the framework for what comes next is set out. The direction and actions set out in the Route Map are complemented by the provisions in the [Circular Economy \(Scotland\) Bill](#), and in some places are dependent on enabling powers flowing from the Bill if passed.

¹ The Scottish Government sought views on the Route Map through a [public consultation](#) exercise, which ran between 30 May and 22 August 2022. It contained eight closed questions with an open response component and 12 open questions. The [consultation analysis](#) was published in 2023.

3. Reducing emissions associated with resources and waste. The Route Map sets out the opportunities the Scottish Government will seek to take to decarbonise the waste sector.

The updated draft Route Map has been streamlined from seven packages to four strategic aims, each with priority actions and further actions: Reduce and reuse: Modernise recycling; Decarbonise disposal; and Strengthen the circular economy. The Scottish Government has also published updated impact assessments and a [Strategic Environmental Assessment](#) report alongside the Route Map consultation document.

1.2 The consultation

A public consultation on the Route Map took place from 18 January 2024 to 15 March 2024. The consultation contained 24 questions about the proposals, comprising eight closed and 16 open questions. Questions asked respondents to share their views on the priority and further actions outlined under each of the four strategic aims in the Route Map, as well as on the impact assessments and Strategic Environmental Assessment that have been published by the Scottish Government. A list of the consultation questions is in Appendix A.

1.3 Respondent profile

In total, 156 consultation responses were received. Most were submitted via the online consultation platform, Citizen Space. Those received in an alternative format, for example an email or PDF document, were reviewed separately by the research team.

Individuals provided 43 responses to the consultation; the remaining 113 were from organisations. To aid analysis, each organisation was assigned a sector or type. The largest share of organisational responses came from retail and packaging organisations, the third sector, and local authorities.

Table 1: Sectoral classification

Sector	n=	%
Retail & packaging	27	17%
Third sector	18	12%
Local Authority	15	10%
Public body	11	7%
Waste management	10	6%
Construction & development	9	6%
Other - Membership / representative body not aligned with another sector	6	4%
Other – Energy	5	3%
Other – Manufacturing	3	2%
Other – Consulting	3	2%
Other – Academia	3	2%

Other	3	2%
Individuals	43	28%

The number and profile of responses is very similar to the previous consultation which received 160 responses from 48 individuals (30%) and 112 organisations (70%).

1.4 Approach to analysis

The Lines Between was commissioned to provide a robust, independent analysis of the responses to the public consultation. The main purpose of consultation analysis is to understand the full range of views expressed, and where possible using closed questions to quantify how many people held particular views. This report provides a thematic analysis of responses based on the analysis approach outlined below.

1.4.1 Quantitative analysis

The analysis of responses to each question begins with a summary of the closed question data illustrating the range of opinions held by respondents.

As not all respondents answered each closed question, the quantitative analysis in the main report is based on those who answered each question. Each table shows:

- The number of respondents from the **total sample** of 156 who selected each response, and the corresponding percentage.
- The number and percentage response **among those answering each question**, broken down by individual and organisation responses and by type of organisation.

Please note that figures in the tables may not add to 100% due to rounding. A full breakdown of the number and percentage of responses to each question can be found in Appendix C.

1.4.2 Qualitative analysis

Qualitative analysis identifies the key themes across responses to each question. The research team developed a draft coding framework based on a review of the consultation questions and a sample of responses. During the coding process, new codes were created if additional themes emerged.

Reflecting the large number of people who took part, it is impossible to detail every response in this report. A few organisations shared lengthy submissions reflecting their specific industry or subject matter expertise. These responses are referenced where possible. Full responses to the consultation, where permission for publication was granted, can be found on the [Scottish Government's consultation website](#).

Where appropriate, quotes from a range of participants are included to illustrate key points and provide useful examples, insights and contextual information.

When reviewing the analysis in this report, we would ask the reader to consider:

- Public consultations invite everyone to express their views; individuals and organisations interested in the topic are more likely to respond than those without a direct or known interest. **This self-selection means the views of respondents do not necessarily represent the views of the entire population.**
- In a small number of instances where alternative format responses contained information that did not align with specific questions, analysts exercised judgment about the most relevant place to include this material for analysis purposes.
- Analysis of the quantitative responses indicates a high level of overall support for the Route Map. While many respondents agreed with the proposals at the closed questions, they caveated their agreement in open comments by highlighting concerns or queries raised about specific proposals or aspects of the Route Map.
- One less common theme among open-text responses throughout the consultation was frustration with the design of the questionnaire; closed questions did not allow respondents to express agreement or disagreement with individual actions, instead asking them to agree or disagree with the proposed group of actions as a whole. A small number of respondents explained that they had to select 'disagree' or 'neither agree nor disagree' at the closed questions as a result, despite only objecting to one of the proposed actions.
- Throughout the report, priority and further actions are discussed in the same order as they were presented in the consultation paper.
- Some of the proposed actions refer to specific schemes, plans or processes which, due to space constraints, have not been fully defined in this report. Further information on such terms can be found in the [consultation paper](#).

1.4.3 Weight of opinion

Qualitative analysis of open-ended questions does not permit the quantification of results. However, to assist the reader in interpreting the findings, a framework is used to convey the most to least commonly identified themes in responses to each question:

- Many respondents; a point raised by more than 20 respondents.
- Several respondents; 11-20, a recurring theme.
- Some respondents; 5-10, another theme.
- A few / a small number of respondents; <5, a less commonly mentioned theme.
- Two/one respondents; a singular comment or a view identified in two responses.

While most of this report is structured around the strategic aims and actions within the Route Map, themes are presented from most to least prevalent where possible and appropriate to do so.

All themes, including views shared by small numbers of respondents, are covered in this report; an insightful view expressed by a very small number of participants is not given less weight than more general comments shared by a majority. Similarly, all responses have an equal weighting. We recognise this means a response from an individual has the same weight as the response from an organisation which may represent many members, but this approach ensures all views are presented.

2. Reduce and reuse

This chapter presents analysis of responses to Question 1 and 2, which explored views on the priority and further actions identified under the Reduce and reuse strategic aim.

2.1 Reduce and reuse: priority actions

Q1: To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	39	65	13	8	10	21
All respondents (%)	156	25	42	8	5	6	13
All answering (%)	135	29	48	10	6	7	-
Individuals (%)	42	45	29	5	5	17	-
Organisations (%)	93	22	57	12	6	3	-
- Retail & packaging	22	23	36	23	5	14	-
- Third sector	17	12	71	0	18	0	-
- Local Authority	15	33	47	13	7	0	-
- Public body	8	38	63	0	0	0	-
- Waste management	8	13	50	25	13	0	-
- Construction / Dev ²	7	14	86	0	0	0	-
- Other	16	19	69	13	0	0	-

Among those who answered Q1, over three quarters (77%) agreed to some extent with the priority actions within the Reduce and reuse strategic aim; 29% agreed strongly and 48% agreed. A further one in ten (10%) neither agreed not disagreed, and 13% disagreed to some extent.

While organisations recorded slightly higher levels of total agreement than individuals (78% compared to 74% respectively), individuals were more likely to agree strongly with the priority actions (45% compared to 22%). This pattern of organisations having higher total agreement but individuals recording higher strong agreement was evident across all closed questions.

Support for the priority actions varied by type of organisation, ranging from all public bodies and construction and development organisations agreeing to some extent, compared to 63% of waste management organisations and 59% in the retail and packaging sector.

² The full category title is 'Construction & Development' – this has been shortened throughout the report for conciseness.

Question 1 received 113 open text comments. Most respondents commented on each of the priority actions in turn, and as such, this section is structured around feedback specific to each of the priority actions.³ However, some respondents shared more general views on the Reduce and reuse strategic aim and the priority actions as a whole. For example, many expressed broad approval of the four proposed priority actions; they were described as “sensible”, “well-considered” and “important”. Others welcomed the inclusion of Reduce and reuse as the first and most prominent strategic aim in the Route Map, noting that this embraces the ethos of a circular economy and reflects the principles of the waste hierarchy.

However, some general concerns were also raised about the priority actions under the Reduce and reuse strategic aim. A few respondents described the proposed measures as vague and non-specific, and others viewed them as lacking sufficient urgency and ambition. For example, one pointed out that most of the priority actions focus on planning or scoping measures as opposed to delivering direct action. As with the previous iteration of the Route Map, some respondents argued that the proposed actions place too much responsibility on the individual consumer, suggesting that more measures should be targeted at addressing the actions of producers, retailers, manufacturers and businesses.

2.1.1 Priority actions under Section 1: Drive responsible consumption, production and re-use

Develop and publish a Product Stewardship Plan to tackle the environmental impact of priority products.

Plans to develop and publish a Product Stewardship Plan were met with broad support. Respondents discussed the benefits of a Product Stewardship Plan, describing it as important in driving reuse and repair, tackling problematic waste streams, reducing fly tipping and ensuring products last longer and are repairable. Several respondents welcomed the emphasis on environmental accountability across all activities in the supply chain, and others highlighted the importance of shared responsibility throughout a product’s lifecycle. There were calls for a more ambitious timeframe for the publication of the Product Stewardship Plan, with a few respondents suggesting it would be best to publish an initial version in 2024 and then improve upon this by the 2025/26 timeframe specified in the Route Map.

“Given that work has been ongoing on this issue since 2016, we would urge a quicker adoption of widespread producer responsibility/product stewardship: the Route Map does not commit to an implementation date, and only proposes the publication of a plan by 2026.” – Action to Protect Rural Scotland

Several respondents expressed support for the priority products approach and agreed with the selection of the three products under consideration in the Route Map, recognising the carbon impact of these items.

“Supportive of the inclusion of “mattresses, tyres and textiles” in the list of priority products based on Zero Waste Scotland’s latest carbon metric report where textiles make up nearly

³ This also applies to the other chapters in the report.

a third (32%) of the carbon impact of Scotland’s household waste.” – Highlands and Islands Enterprise

References were made to the success of similar approaches in other countries. For example, Glasgow City Council noted that Extended Producer Responsibility policies for textiles have been successfully implemented in countries across the EU. A few organisations with expertise relevant to the priority products made detailed comments about the schemes/processes currently in place to maximise the circularity of such products. For example, the British Tyre Manufacturing Association discussed how its members are committed to developing the circular economy for tyres through the increased use of sustainable and recycled raw materials, extended product lifecycles and improved recovery outcomes for end-of-life tyres.

A few sought clarity on the process through which priority products will be identified, and a number of additional/alternative priority products were suggested. These included aquaculture equipment, lithium batteries and plastic takeaway boxes. Various Local Authorities (including Aberdeenshire, Argyll & Bute and West Lothian Councils) raised concerns about the financial burden of meeting the disposal requirements of items containing Persistent Organic Pollutants (POPs), and suggested products with POPs such as Waste Upholstered Domestic Seating should be considered for selection as priority products. LARAC echoed these concerns, highlighting “a notable absence of initiatives incorporating POPs into Extended Producer Responsibility (EPR) frameworks” and calling for the Route Map to adequately address POPs.

Some respondents, including Action to Protect Rural Scotland, shared concerns about the approach of focusing on three specific priority products, fearing that this would leave the vast bulk of the products used in Scotland within the existing linear economy model and could result in insufficient action in this area. Instead, they advocated for a move towards producer responsibility being the standard approach for all products, with exemptions applied on a case-by-case basis.

The importance of taking a four-nation approach to Product Stewardship was emphasised by a few respondents, with CIWM Scotland and SESA both noting that many policies and interventions related to product stewardship (product design, EPR etc) fall within reserved matters rather than devolved powers. A few respondents advised that the Route Map requires further consideration of the impact of Extended Producer Responsibility, particularly on businesses and SMEs.

A number of organisations within the retail and packaging sector, including The Paper Cup Alliance and Benders Paper Cups, did not support plans to publish a Product Stewardship Plan at this stage, citing significant concerns about the potential introduction of levies and taxes on single use packaging.

2.1.2 Priority actions under Section 2: Reduce food waste

Deliver an intervention plan to guide long-term work on household food waste reduction behaviour change.

Respondents from a mix of sectors expressed support for this priority action, describing food waste reduction as critical in cutting carbon emissions, addressing biodiversity loss, decreasing the environmental impact of food production and supporting food security.

Several commented on the scale of current food waste levels in Scotland, with a number of local authorities and organisations in the waste management sector reflecting on recent compositional analysis studies which show significant levels of household food waste in residual waste streams.

“WRAP strongly supports the priority action for a long-term intervention plan for reducing household food waste. Household food waste represents the largest single source of food waste in Scotland (as with the rest of the UK). Therefore, minimising the amount arising and its impact is important to meeting food-waste targets as well as broader environmental targets.” – Waste and Resources Action Programme (WRAP)

Several respondents approved of the focus on driving behaviour change, emphasising the importance of widespread mindset and behaviour change in reducing household food waste.

“In relation to food waste, behavioural change is key and fundamental to unlocking reductions in food waste over the coming period.” – Scotland Excel

Some respondents provided suggestions on how to strengthen this priority action. Glasgow City Council noted that, while education and awareness raising can be helpful, there should also be a clear focus on incentivisation and providing better alternatives to encourage behaviour change and reduce household waste, for example by providing sustained funding for community fridges and developing robust local/regional food systems where local agriculture can meet local food needs.

A few respondents, including NatureScot and a small number of individuals, felt that this priority action should place a stronger emphasis on ‘upstream’ measures as opposed to focussing on the ‘end-of-pipe’ stage of food consumption. They argued that producing food that is healthy and sustainable for the planet would represent more effective resource use, accelerate the transition to net zero, build resilience to climate risks and enhance food-fibre-water security.

Develop with stakeholders the most effective way to implement mandatory reporting for food waste and surplus by businesses.

Several respondents expressed support for this priority action, highlighting significant gaps in data in this area and recognising that mandatory reporting for food surplus will facilitate effective monitoring, management and ultimately reduction of waste.

“The first step for countries and food chain operators to take meaningful food waste reduction measures is to actually measure current levels of food waste, and publicly report them. Upon discovery of waste in operations, businesses will take action to eliminate this waste given it is costly and inefficient.” – Too Good To Go

The collaborative approach set out in the Route Map was welcomed by a number of organisations in the waste management and retail and packaging sectors, among others.

However, some organisations from a mix of sectors, including local authorities and retail and packaging, raised concerns about the additional cost, resource and administrative

burdens that mandatory reporting could impose on the retail and hospitality sector, cautioning that SMEs may struggle to meet the requirements.

“Small businesses understand that as part of the transition to net zero, system-wide transformation will have to be undertaken in relation to waste. However, placing further reporting requirements on small businesses will increase pressure on already squeezed resources.” – Federation of Small Businesses (Scotland)

Others advised that adequate time, investment and support for businesses will be required to facilitate mandatory reporting for food waste and surplus.

“For food waste reporting processes to be implemented, the Scottish Government must ensure that a stable and attractive policy and investment environment is created, to give businesses the confidence and knowledge to invest. Similarly, if a change in reporting process is implemented, realistic timescales must be provided to allow businesses to prepare, invest and embed the necessary changes, including behavioural change and education.” – Company Shop Group

Scottish Wholesale Association called for further detail on the practical implementation of the reporting and the calculation methods to be used, requesting clarification on how the information will be captured, assessed, and ultimately utilised. McDonald’s UK and Ireland also called for further detail, seeking clarity on the definition of food waste.

“We urge the Scottish Government to clarify the definition of food waste. Whilst we can report on food waste from the kitchen, most of the food waste generated in our kitchen is unavoidable, such as eggshells and coffee grounds. Additionally, we follow food safety and quality standards, which results in some food being thrown away.” – McDonald’s UK and Ireland

Edinburgh Chamber of Commerce questioned whether mandatory food waste reporting would apply only to commercial businesses or whether it would also apply to other non-domestic organisations such as charities that provide food, or schools. A few respondents called for clear definitions and classifications of waste and surplus which explicitly separates edible stock from non-edible products. As with other priority actions, a few respondents, encouraged the Scottish Government to proceed with an aligned four-nation approach, arguing that Scottish-specific reporting would be more complex and require further resources for businesses that operate at a UK level.

2.1.3 Priority actions under Section 3: Embed circular construction practices

Support the development of regional Scottish hubs and networks for the reuse of construction materials and assets.

This priority action received less feedback than others, with a number of respondents noting that they had little expertise on construction and therefore did not have any comment to add. This was also reflected in the corresponding further actions relating to construction. However, most comments which did address this priority action were supportive in nature. Respondents pointed out some of the potential benefits of this action, including a more circular and sustainable construction industry, the creation of

economic/commercial opportunities for businesses and strengthened local supply chains. United Kingdom Without Incineration Network (UKWIN) referred to the success of similar approaches in the USA, where reuse parks for embedding circular construction practices are helping to ensure that surplus resources are not treated as 'waste' when they can be reused.

Organisations within the construction and development sector were broadly supportive of this priority action, with a few acknowledging the leading role the construction sector can play in implementing circular economy practices and others welcoming efforts to share best practice, reduce barriers, and facilitate reuse of materials.

“We consider regional hubs and networks supporting reuse of construction materials and assets as a potentially positive step towards ensuring that local – and suitable – materials can be recycled where possible.” – BEFS (Built Environment Forum Scotland)

While supportive of the prioritisation of circular construction within this aim, UKRI Interdisciplinary Circular Economy Centre for Mineral-Based Construction Materials highlighted a number of broader issues limiting the potential success of platforms for listing and sourcing reclaimed materials. These included: a need for quality assurance of secondary materials for construction in terms of longevity, strength and durability; challenges with material characterisation data; and systemic barriers, such as insurers being reluctant to support firms who use reclaimed or reused products.

Scottish Ecological Design Association suggested additional actions under this objective, including net positive waste practices, integrating waste reduction into all phases of delivery, promoting Material Conservation Management Plans and mandating End of Life Phase plans.

Scottish Water proposed that machines and parts should be included in this initiative, and suggested that a construction materials library/database could be utilised by all businesses at design stage in order to “reduce virgin product use in construction and grow the market for recycled materials”.

Some individuals and organisations, including Mineral Products Association Scotland and BEFS (Built Environment Forum Scotland), called for further detail on how materials hubs would work. A few respondents, including LARAC, Argyll & Bute Council and Comhairle nan Eilean Siar advised that responsibility for the reuse of construction materials should not lie with local authorities but rather with relevant industry bodies.

The Highland Council highlighted potential challenges in the development of regional hubs and networks for the reuse of construction materials, such as securing appropriate sites and licensing matters. These concerns were echoed by other respondents; for example, The Royal Town Planning Institute Scotland felt that the Route Map would benefit from greater consideration of the spatial consequences of regional hubs for reclaimed or reusable construction materials/assets, advising that these will need to be located within a reasonable distance from sources or end users and accessible to suitable transport infrastructure, e.g. rail and road networks. In addition, the Insulation Manufacturer's Association advised that consideration needs to be given to whether third party certification would cover construction products if reused, and one individual questioned whether warranties would remain intact for reused products.

2.1.4 Suggestions for additional priority actions

A priority action focussing on consumer education was suggested by a small number, and a few respondents expressed disappointment at the absence of any actions targeted at supermarkets and retailers. These respondents suggested additional measures such as: stricter regulation around production within the fast fashion industry; limitations around supermarket offers/deals which promote overconsumption e.g. buy one get one free; and a review of rules around ‘sell by’ and ‘use by’ dates on perishable items to minimise food waste.

“You should also tackle the lack of seasonality in Scotland’s supermarket profit-driven ‘food culture’ – which would also have a substantial impact on food import and transportation emissions, and the levels of waste created.” – Individual

A few respondents called for actions aimed at increasing donations/redistribution of surplus food. For example, the City of Edinburgh Council suggested learning could be drawn from a scheme in France whereby large supermarkets and mass caterers are required to establish a partnership with a charity to donate unsold food products and food retailers are forbidden to destroy food products still fit for consumption.

Too Good To Go proposed a number of additional actions for consideration, including:

- A strengthened mandatory food waste reporting framework which includes primary production, and phased-in reporting for medium sized businesses.
- Legally binding food waste reduction targets as recently set out by the European Commission and Parliament.
- An adjustment to financial incentives to better prioritise actions higher up the food waste hierarchy.
- Mandating the use of ‘doggy bags’ in restaurants.
- Adding food waste prevention to the curriculum for excellence to shape behaviour.

2.2 Reduce and reuse: further actions

Q2: To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	27	69	15	13	12	20
All respondents (%)	156	17	44	10	8	8	13
All answering (%)	136	20	51	11	10	9	-
Individuals (%)	42	40	29	5	7	19	-
Organisations (%)	94	11	61	14	11	4	-
- Retail & packaging	23	0	30	35	17	17	-
- Third sector	17	12	59	0	29	0	-

- Local Authority	15	27	60	13	0	0	-
- Public body	8	13	88	0	0	0	-
- Waste management	8	13	88	0	0	0	-
- Construction / Dev	7	0	71	29	0	0	-
- Other	16	13	75	6	6	0	-

Seven in ten (71%) of those answering Q2 agreed with the further actions to 2030; one in five (20%) agreed strongly and just over half (51%) agreed. There was slightly higher disagreement with the further actions than the priority actions, with 19% disagreeing to some extent.

Although total agreement with the further actions was similar among individuals and organisations (69% compared to 71% respectively), there was a more marked difference in strong agreement. Two fifths (40%) of individuals agreed strongly, compared to one in ten (11%) of organisations. While organisations in most sectors were in broad agreement i.e. over 70% agreeing to some extent, support was lower among retail and packaging organisations. Among those in this sector who answered, none agreed strongly with the proposals, 30% agreed, 35% were neutral and 34% disagreed.

Question 2 received 113 open text comments. The following section provides a summary of views on each of the 17 proposed further actions.

2.2.1 Further actions under Section 1: Drive responsible consumption, production and re-use

Deliver a prioritised approach to the introduction of environmental charges for problematic products.

There were mixed views on this further action. Some respondents, including a number of local authorities and organisations in the waste management sector, agreed that financial charges will help to disincentivise the use of problematic products and help consumers to make more sustainable choices. Aberdeenshire Council suggested that income from environmental charges could be used to ensure end markets for the recycling of all the material streams/products being placed on the market.

However, a similar number of respondents, including NFU Scotland and a number of organisations in the retail and packaging sector, expressed concern about the potential negative impacts this measure may have on businesses and consumers. A few highlighted the need to consider the viability of alternatives before implementing environmental charges for problematic products.

“SWA expresses concern about the potential ongoing introduction of new environmental charges. Any impact on the food and drink supply chain reverberates throughout the sector. When more food and drink-related products are labelled as “problematic,” businesses face additional burdens. These burdens ultimately affect consumers through higher costs or reduced availability.” – Scottish Wholesale Association

Some called for clarity on the process through which items will be defined as problematic products. A few organisations, including the Cosmetic, Toiletry and Perfumery Association,

advised that decisions around which products will be subject to environmental charges should be data driven and evidence based, for example underpinned by evidence that the products are commonly littered and pose a risk of harm to the environment.

While supportive of this further action, SUEZ Recycling and Recovery UK Limited expressed concern that the timeline of 2025 and lack of detailed data would mean that the deadline is not achievable or that the action may be ineffective.

Introduce a charge for single-use disposable cups.

Respondents from a mix of sectors endorsed this further action, with some reflecting on the scale of single-use disposable cups usage/waste and the potential benefits of a reduction in their usage, e.g. a reduction in the need for raw materials to produce fibre for cups. Some agreed that introducing a charge is likely to influence behaviour change and encourage consumers to embrace more sustainable options, as has been evidenced by the introduction of the carrier bag charge.

“LARAC endorses the proposal for Scotland to introduce a charge for single-use disposable cups by 2025. This alignment is supported by compelling reasons, including that an estimated 4,566.6 tonnes of single-use cups and 583.1 tonnes of plastic lids are placed on the market annually. LARAC anticipates that implementing a charge for single-use cups would contribute to a significant reduction in their sales, as well as other disposable items. Such a decrease in demand is expected to result in a long-term reduction in the need for raw materials, such as timber felling, to produce fibre for cups and other related materials.” – LARAC

However, a few questioned the validity of direct comparisons with the carrier bag charge and expressed doubt that the measure will yield similar results, noting that unlike plastic bags, cups need to be cleaned before they can be reused. In addition, single use drinks cups are not typically taken back to the home, and cups cannot be conveniently folded away into an individual’s pocket but need to be physically carried.

There was significant opposition to the proposal among organisations in the retail and packaging sector. Reasons for disagreement included concerns about:

- The financial impact of the charge on consumers and businesses.
- A lack of consultation with stakeholders and impact assessment.
- The sustainability of reusable alternatives to single use disposable cups, which are often not made from particularly environmentally friendly materials and are difficult to recycle once they reach the end of their product life cycle.
- Risks of cross contamination with reused items.
- The scheme undermining the proposed UK-wide retailer takeback of paper cups.

“The Paper Cup Alliance do not consider it appropriate under any circumstances for charges to single-use product to be introduced without full consultation with all stakeholders and with impact assessments.” – The Paper Cup Alliance

Some organisations within the retail and packaging sector also reflected on the existing capability and capacity within the UK to recycle paper cups.

Some respondents recommended the introduction of a mandatory, producer-led takeback obligation whereby vendors or sellers of cups are obligated to accept cups back for cleaning and reuse in lieu of a consumer charge. A few called for stronger measures to be implemented, for example an outright ban on single use disposable cups or the charge to apply to other items such as single use food containers.

As with other measures in the Route Map, a few respondents encouraged the Scottish Government to align action with the UK Government to avoid undue complications for businesses that operate on a UK-wide basis.

Consult on actions regarding the environmental impacts of single use vapes.

Most respondents who commented on this further action were supportive of implementing measures to address the environmental impacts of single use vapes. Several respondents across a range of sectors supported the upcoming ban on single use vapes, citing a range of environmental, health, and safety concerns attached to vaping. Plastic-Free Dalgety Bay suggested restrictions should also be applied to reusable vapes, noting that their low-cost may result in users treating them as disposable in the face of a ban on single-use vapes.

Action to Protect Rural Scotland suggested that introducing a producer takeback requirement may be an effective approach as it would encourage reusability, better product design, and lower levels of littering. Two respondents raised concerns that producers may try to get around the ban by simply adding USB ports to existing disposable models. One anonymous organisation advised that a new Waste from Electrical and Electronic Equipment (WEEE) category should be established for vapes to ensure that producers meet their responsibilities in relation to the safe collection and recycling costs of vapes.

Scottish Grocers Federation raised concerns that this policy will have unintended consequences as it may result in a reduction in the number of people able to access vaping products as a means of tobacco cessation.

Review the feasibility of setting reuse targets.

There were mixed levels of support for the introduction of reuse targets. Some agreed that setting reuse targets may help to promote and drive reuse, and Circular Communities Scotland suggested that this further action should be upgraded to a priority action. However, concerns were raised about the obligations that reuse targets would impose on local authorities, with a few respondents expressing the view that responsibility for driving reuse initiatives should be directed towards producers. A few felt that setting and monitoring reuse targets would be a challenging task, noting that reuse takes place across multiple channels, such as charity shops, online marketplaces and informally through family and friends, and therefore will be difficult to measure.

A number of organisations across different sectors advised that reuse targets should not be set without significant, wide ranging consultation and engagement with stakeholders across the supply chain. One anonymous organisation provided a detailed response

outlining a number of concerns about reuse targets specific to the Electrical and Electronic Equipment sector, for example risks that reuse could keep inefficient or unsafe products in use for longer than desirable, or conflict with other policy objectives, such as energy efficiency.

Some felt that additional measures would be required to support the successful implementation of reuse targets, such as support and investment in reuse hubs, additional resourcing for local authorities and further requirements imposed on producers to increase the reusability and repairability of products.

Develop restrictions on the destruction of unsold consumer goods.

Most respondents who commented on this action expressed broad support, considering this action an important step in the move towards a circular economy and welcoming the notion of surplus stock being redirected through avenues such as sales, donations, or recycling. A few highlighted benefits beyond environmental impact, such as the potential to ease cost of living pressures and help households in poverty. Circular Communities Scotland recommended that this further action should be upgraded to a priority action.

A few organisations advised that products that pose a potential safety risk must be taken into consideration when implementing restrictions on the destruction of unsold goods. One anonymous respondent welcomed the proportionate approach suggested in the consultation, describing an outright ban on the disposal of unsold goods as “unworkable” and noting that for the small number of unsold products which are currently destroyed, there is no realistic alternative option. The Cosmetic, Toiletry and Perfumery Association called for clearer definitions of terms such as ‘destruction’, ‘unsold’, and ‘disposal’.

While supportive of the proposed action, Action to Protect Rural Scotland noted they did not expect significant results from this policy, noting that it simply moves “a small number products onto the lowest rung of the linear economy” by switching them from ‘produce-dispose’ to ‘produce-use-dispose’. This was echoed by Scotland Excel, who flagged that it is important that such goods do not find their way almost immediately to landfill or other waste streams through alternative channels.

Develop measures to improve the reuse experience for consumers.

There was broad support for this action, with respondents suggesting measures such as: additional financial support for repair cafes, sharing libraries and food surplus redistribution hubs; strengthening rights-to-repair provisions and addressing the cultural barriers/stigma attached to buying second hand items. A few stressed that this action must be accompanied by further requirements imposed on producers to increase the reusability and repairability of products.

Deliver behaviour change-based approaches focused on sustainable consumption, aligned to Let’s Do Net Zero communications.

Most respondents who commented on this action were supportive, agreeing that behavioural and attitudinal change is key in reducing consumption and encouraging reuse among the public. Several expressed support for investment in national and local communications and education on sustainable consumption.

“Significant work is required nationally, as well as locally, to drive behaviour change and understanding around what is resource and what is waste; the value in reuse or repurposing; buying better, where possible, and keeping longer; and food waste having a real value as compostable material.” – Aberdeenshire Council

A few respondents asked for further detail on how these this action will be funded. The 'One Bin to Rule Them All' Team at University of Manchester stressed the need to move beyond behavioural change approaches in policy and highlighted that the onus should not be on consumers to make the 'right' choice but to ensure that sustainability is designed into products i.e. they are made to be reusable and recyclable.

Identify ways to expand business models that prolong product lifespan.

There was broad support for this action, with the lengthening of product lifespans described as “a worthwhile objective” by one respondent. A few organisations stressed the need for supportive policies to drive businesses toward adopting and expanding models that prolong product lifespan, such as incentives and mandates. Resource Management Association Scotland (RMAS) suggested that this section of the Route Map should include a reference to incentivising ‘designed longevity’ alongside ‘upgradeability, repair and circular business models.’ South Lanarkshire Council suggested that Circular Communities Scotland’s model of ‘Re-Use Consortium’ should be further explored in expanding business models that prolong product lifespan.

A few respondents, while supportive of this action, felt this aspect of the Route Map lacked sufficient and meaningful detail, and suggested that more information on the implementation of this action should be provided.

2.2.2 Further actions under Section 2: Reduce food waste

Strengthen data and evidence.

All of the respondents who commented on this action, including Waste and Resources Action Programme (WRAP), Fife Council and West Lothian Council were supportive of the proposed action to strengthen data and evidence around food waste. It was noted that quality data is likely to support effective decision making, help target activities to maximise impact and contribute to service improvement. The Highland Council noted particular interest in securing regular funding and resource support for Waste Compositional Analysis activities at a local government level.

Review the rural exemption for food waste recycling, as part of recycling co-design process.

A review into the rural exemption for food waste recycling was welcomed by some respondents, with a few organisations in the waste management sector describing it as “long overdue”. A few local authorities raised concerns about the review, with Fife Council noting that funding for additional vehicles would be required if the exemption is removed, and The Highland Council highlighting the gaps in accessible infrastructure across Scotland, particularly in the Highlands. While supportive of the review, NFU Scotland and SUEZ Recycling and Recovery UK Limited echoed The Highland Council’s concerns,

noting that significant improvements in rural infrastructure would be required and some isolated communities may need to be exempt if the rural exemption is removed.

Investigate feasibility of voluntary food waste reduction action plans.

Few respondents commented specifically on plans to investigate the feasibility of voluntary food waste reduction action plans. A few respondents questioned the likelihood of businesses responding to voluntary measures and expressed a preference for mandatory action plans, with one suggesting that an official regulator such as SEPA would have more influence on this. A small number advised that this action would require consultation and engagement with industry bodies, and the Company Shop Group recommended that the voluntary action plan should only be introduced once a firm decision is made on measurement and reporting processes, as these will come “hand in hand” with one another.

Deliver enhanced support for businesses.

Most comments on this further action were generally supportive, with broad recognition of the need for enhanced support for businesses to reduce food waste. The Scottish Wholesale Association noted that feedback from members suggests that more education and training tools around food waste measurement and reduction activities would be welcomed. While supportive of this action, The Highland Council and The Association for Renewable Energy and Clean Technology both agreed that this will require adequate resources to enforce current and future legislation.

2.2.3 Further actions under Section 3: Embed circular construction practices

Develop new and promote existing best practice standards in circular practices within the construction sector, and assess the options for both voluntary and mandatory compliance.

Among comments directly relevant to this action, there was broad support for the development of new, and the promotion of existing, best practice standards. A few respondents, including The Royal Town Planning Institute Scotland and organisations from other sectors, noted that this will play an important role in facilitating a move towards more circular practices in the construction sector. Historic Environment Scotland recognised that such concepts are new for many businesses, and therefore national standards and practices would be of benefit and likely lead to more businesses mainstreaming them. There were mixed views on whether compliance should be voluntary or mandatory; a few felt that uptake of voluntary compliance is often limited, and advised that mandatory compliance is the most effective way to proceed. However, the Institute of Environmental Management and Assessment favoured an approach which involves compliance levers, such as a voluntary ‘comply or explain’ approach, with mandatory compliance reserved for the most important drivers to transition to a circular economy.

Investigate and promote options to incentivise and build capacity for the refurbishment of buildings.

Response to this further action was generally positive, with a few reflecting on the financial and environmental benefits of retrofit. A few organisations, including The Royal Town Planning Institute Scotland, Historic Environment Scotland and Glasgow City Council

welcomed the proposal to work with relevant stakeholders to better understand how the local application of circular economy planning principles set out in NPF4 can support more refurbishment of existing buildings over new build.

While supportive of this further action, the Institute of Environmental Management and Assessment cautioned that when refurbishment is combined with a change of building use, stronger regulation is required to ensure any conversions provide safe and healthy spaces.

Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill.

Some supported this action, welcoming the ambition to reduce soil and stone disturbance, movement and volumes going to landfill. Aside from this, there was little consensus among comments on this further action. CL:AIRE highlighted that promotion of existing best practice in circular practices is fundamental to the ways of reducing volumes of soil and stones going to landfill, citing an example of a scheme in England and Wales which has had great success in diverting soils and stones from landfill by applying the CL:AIRE Definition of Waste Code of Practice (DoW:CoP) on behalf of the Environment Agency (EA) and Natural Resources Wales (NRW).

UKRI Interdisciplinary Circular Economy Centre for Mineral-Based Construction Materials recommended that Scotland should consider how soil reuse depots can be incentivised and scaled up, so that there is a viable alternative to landfill, but recognised that there are complexities to consider such as storage costs, data capability and initiatives for separation of soil to prepare for reuse. The Institute of Environmental Management and Assessment advised that it is important to consider that soil ecology is often uniquely adapted to a particular area and so removal from site, even if the soil avoids landfill and is used elsewhere, will reduce the soil's capacity to support biodiversity and act as a carbon sink.

One anonymous organisation felt that this action does not go far enough and recommended that soil and stones should be banned from landfill, suggesting it is easily recycled to feed circular building materials.

Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction.

Few respondents commented on this further action; those who did were supportive, with one highlighting that circular procurement in construction offers a significant opportunity to reduce carbon emissions and consumption in the sector.

Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices.

Some respondents expressed support for this further action, recognising that taxes can be a strong tool in incentivising the uptake of recycled materials.

“We strongly agree with the proposed action to consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices. To enforce, encourage and enable circular economy activities, taxes that curb consumption and penalise undesirable behaviours are an essential implementation tool alongside regulations, incentives and reporting.” – Institute of Chartered Accountants in England and Wales

However, a few questioned the impact of this proposal, suggesting there is little scope to significantly increase the efficiency of aggregate recycling in Scotland due to current high levels of compliance. Mineral Products Association Scotland noted that policy measures and interventions to extend the lifespan of buildings could lead to a reduction in the supply of demolition waste which can be used as recycled aggregates.

While supportive of incentivising aggregate recycling, a few advised that more caution is needed with respect to incinerator bottom ash aggregate. For example, United Kingdom Without Incineration Network (UKWIN) highlighted a need to ensure that the use of incinerator bottom ash aggregate is closely regulated due to the potentially hazardous or toxic properties of this material, and is not classed as ‘recycling’.

3. Modernise recycling

This chapter presents analysis of responses to Question 3 and 4, which explored views on the priority and further actions identified under the Modernise recycling strategic aim.

3.1 Modernise recycling: priority actions

Q3: To what extent do you agree with the priority actions proposed within the Modernise recycling strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	30	62	11	12	6	35
All respondents (%)	156	19	40	7	8	4	22
All answering (%)	121	25	51	9	10	5	-
Individuals (%)	42	38	29	10	12	12	-
Organisations (%)	79	18	63	9	9	1	-
- Retail & packaging	17	18	76	6	0	0	-
- Third sector	15	13	40	13	27	7	-
- Local Authority	15	7	80	13	0	0	-
- Public body	7	29	57	14	0	0	-
- Waste management	7	29	71	0	0	0	-
- Construction / Dev	4	0	50	0	50	0	-
- Other	14	29	57	7	7	0	-

Three quarters (76%) of those who answered Q3 agreed with the priority actions proposed in the Modernise recycling strategic aim. One quarter (25%) strongly agreed and 51% agreed, with one in ten (9%) neutral and 15% disagreeing.

Organisations recorded a higher level of agreement than individuals (81% compared to 67% respectively), with the majority of organisations again agreeing rather than strongly agreeing. Levels of agreement varied considerably across different sectors. Support was lowest among construction and development organisations (50% agreed and none agreed strongly) and third sector organisations (53% total agreement and 34% disagreeing). However, at least 86% of all other sectors agreed to some extent, including all waste management organisations and 94% of retail and packaging organisations.

Question 3 received 99 open text comments. As with Questions 1 and 2, some respondents provided overall feedback on this aspect of the Route Map. For example, some expressed general approval of the priority actions, with one individual describing them as “excellent ideas”. A few welcomed the Route Map’s ambition for Scotland to become a world-leader in recycling, where recycling and reuse services are easy to use and accessible to all.

However, one of the main overarching themes under the Modernise recycling strategic aim was questions over how the proposed actions will be resourced; concerns were repeatedly raised that the actions may be difficult to implement due to the financial challenges facing the public sector and lack of available local authority funding and capacity. Additionally, some respondents emphasised the importance of ensuring that the proposed actions do not undermine, hamper or interfere with the implementation of legislation related to Extended Producer Responsibility and the Deposit Return Scheme. As with other areas of the Route Map, a few respondents felt that there is a disproportionate focus on the actions of households and local government, and called for more actions targeted at retailers, businesses and producers. Some respondents, including Consumer Scotland, called for the Route Map to place greater emphasis on actions higher up the waste hierarchy, stressing that preventing waste and reducing consumption is of higher importance than recycling and disposal.

3.1.1 Priority actions under Section 1: Modernise household recycling

Facilitate a co-design process for high quality, high performing household recycling and reuse services with households, COSLA, local authorities and service operators.

Many comments submitted under this question focused on the further actions which the co-design process will inform, e.g. the development of a statutory Code of Practice, as opposed to the co-design process itself. As such, these comments have been considered under the relevant further action subheadings in the next section.

The majority of comments which directly addressed this priority action were positive, with respondents welcoming the focus on high quality and efficient collections. Several individuals and organisations from a mix of sectors expressed support for a collaborative and multi-method service design approach involving a broad spectrum of stakeholders.

Some respondents in the retail and packaging sector, including Scottish Beer and Pub Association and British Glass, recommended that the process should be open to all stakeholders within the packaging value chain including brands, retailers, reproducers and recyclers. Glasgow City Council advised that the co-design process should involve citizens from areas with low recycling rates to identify current barriers to recycling and ways to overcome these. There were also calls for engagement with communities and businesses to take place at a local, grass roots level in addition to national consultation.

However, Argyll & Bute Council raised concerns about the practicality of applying co-design principles to waste and recycling services, fearing that this may result in negotiations being removed from local government control during service changes. The Highland Council, LARAC and CIWM Scotland echoed these concerns, discussing the difficulties of managing the expectations of multiple stakeholders and the likelihood of conflicting views if several stakeholders are involved. A few, including the Association for Renewable Energy and Clean Technology, advised that local authorities may be best placed to lead discussions.

Some respondents, including various local authorities, requested more detail on how the proposed co-design process will be funded and the extent of local government involvement in the plans.

Some comments focused on a desire for more consistent recycling service provision across each of Scotland’s local authority areas, with a few respondents suggesting that a more aligned approach will result in less confusion and higher recycling rates. However, others recognised the challenges of this approach, given differences in geography, housing types and the local availability of recycling infrastructure across Scotland.

3.1.2 Priority actions under Section 2: Commercial recycling

Review of compliance with commercial recycling requirements.

The review of compliance with commercial recycling requirements was broadly welcomed, with a few reflecting on issues with the quality of material collected from commercial premises and others noting this will help to understand, and subsequently address, barriers to compliance with the requirements.

“We would urge the Scottish Government to engage widely with businesses to identify the underlying reasons or barriers to compliance including, among other aspects, whether they have reasonable access to facilities that make sustainable waste decisions practical and cost-effective, and if not, why not and what is needed. ICAEW would be pleased to support this effort through engagement of its members.” – Institute of Chartered Accountants in England and Wales

Some respondents suggested that additional support for businesses would be welcomed, for example to help encourage more diversion of recycling, reduce overall waste and reduce the contamination of trade recycling bins. More widely, a few stressed that any measures taken to improve commercial waste recycling must be underpinned by adequate resources, both for communication to raise awareness of the requirements but also for enforcement.

While the specified timeframe for this action was welcomed by a few, it was described as highly ambitious by others, who felt it may not be achievable.

Co-design measures to improve commercial waste service provisions.

Several respondents expressed support for this priority action, recognising the need for a broad spectrum of stakeholders including local government, the waste industry and businesses to participate in the co-design process. Engagement with the business community was seen as particularly important by some, with a few respondents recognising the need to gather insight on the different waste streams and commercial needs of businesses to maximise efficiency and compliance. A few organisations within the retail and packaging sector advised that the co-design process should involve all stakeholders within the packaging value chain; others emphasised the need to consult a wide variety of businesses, including both larger corporate organisations and SMEs.

INCPEN endorsed the timeframe of this priority action, noting that the timescales proposed offer opportunities for learnings from the co-design process on household recycling to be fully maximised.

Aberdeenshire Council cautioned that, as a local authority which collects trade recycling on household collection routes, significant differences between commercial and household collection services would require additional resources and infrastructure. The Highland

Council sought greater detail on the proposal, noting that most commercial waste collectors operate in a highly competitive environment, which has the potential to make co-design with stakeholder engagement extremely difficult.

The decision not to proceed with mandatory commercial zoning measures was welcomed by a number of respondents in the retail and packaging sector.

3.1.3 Suggestions for additional priority actions

The most common suggestion for an additional priority action in this area related to labelling; some called for the introduction of a requirement to include simple, clear recycling labels on packaging. Other suggestions included a priority action aimed at optimising recycling of construction materials and a specific action on anaerobic digestion, for example 'explore opportunities to increase food and garden waste collection and anaerobic digestion treatment'.

3.2 Modernise recycling: further actions

Q4: To what extent do you agree with the further actions to 2030 listed across the Modernise recycling strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	30	55	12	8	7	44
All respondents (%)	156	19	35	8	5	4	28
All answering (%)	112	27	49	11	7	6	-
Individuals (%)	41	41	24	10	10	15	-
Organisations (%)	71	18	63	11	6	1	-
- Retail & packaging	15	40	47	13	0	0	-
- Third sector	14	7	43	21	21	7	-
- Local Authority	15	7	80	13	0	0	-
- Public body	5	40	60	0	0	0	-
- Waste management	6	17	83	0	0	0	-
- Construction / Dev	3	0	100	0	0	0	-
- Other	13	15	69	8	8	0	-

Levels of support recorded for the further actions to 2030 in the Modernise recycling strategic aim were very similar to support for the priority actions. Overall 76% of those who answered agreed to some extent, with 27% strongly and 49% agreeing.

Over four fifths (82%) of organisations agreed to some extent, compared to 66% of individuals, although again individuals were more likely to agree strongly (41%). At least 85% of organisations who answered in each sector agreed with the further actions to some extent, including all three organisations in the construction and development sector. However, support was lower among third sector organisations, with only half of those

answering expressing agreement with the further actions and one quarter (28%) disagreeing.

Question 4 received 93 open text responses. Analysis of feedback on each of the proposed further actions is provided below.

3.2.1 Further actions under Section 1: Modernise household recycling

Develop a statutory Code of Practice for household waste services.

Plans to develop a statutory Code of Practice⁴ for household waste services were welcomed, with respondents describing this as a key driver in increasing household recycling rates. A few organisations, including Scottish Environment LINK and Circular Communities Scotland, suggested this further action should be upgraded to a priority action. A small number highlighted that communication will be key to the success of the statutory Code of Practice, highlighting the importance of consumer engagement and education.

Some felt that the Code of Practice could help to establish a consistent approach to collections across Scotland, which will reduce confusion and secure greater buy in among households. However, this view was not unanimous; some were concerned that the Code of Practice may present a 'one-size fits all' approach, which they felt would be unsuitable and unlikely to deliver improvements in some areas.

“Waste and recycling services are currently designed by local authorities, who are directly accountable to residents of their area. This has led to continued diversity in service provision, reflecting the needs and choices of each area. Mandatory compliance would remove the scope for councils to operate collection services that meet local needs, transferring more control of how services are provided by central government while applying greater accountability on councils.” – West Lothian Council

A few organisations raised concerns about the quality of recyclate entering the waste stream and suggested that source-separated recycling collection systems should be mandated in the Code of Practice to reduce the risk of contamination.

As with other actions, some respondents stressed that any statutory measures must be adequately resourced, advising that additional requirements stemming from new obligations must be costed and local authorities appropriately remunerated for any additional costs.

“Any statutory Code of Practice must be fully funded, with additional, ring-fenced revenue support for remote island local authorities essential. This support must cover revenue shortfalls, as the value of product collected, regardless of how good the quality might be, is

⁴ The statutory Code of Practice for household waste requirements, stipulated in section 12 of the Circular Economy Bill, will be co-designed with local authorities and other relevant stakeholders. The co-design process of developing this new Code of Practice will allow valuable expertise and understanding to build a Code that improves services for people across Scotland and takes into account the different geographical and community needs that local authorities and residents across Scotland encounter.

unlikely to cover collection, storage, haulage and gate fee charges.” – Comhairle nan Eilean Siar

One anonymous organisation said that they would welcome the introduction of an equivalent statutory Code of Practice for commercial recycling.

Introduce statutory recycling and reuse local performance targets for household waste services.

There were mixed views on the introduction of statutory recycling and reuse performance targets. Some respondents recognised the success the Welsh Government has achieved in utilising statutory recycling targets to drive improvements in local recycling rates and suggested that lessons can be learned from the Welsh approach.

“Evidence from Wales shows that effective policy levers, such as statutory targets, and implementation of residual restrictions, separate collections, and enforcement are successful at reducing costs, carbon emissions and waste.” – Waste and Resources Action Programme (WRAP)

However, a few local authorities opposed the introduction of statutory performance targets, raising various concerns including: a lack of clarity on how new targets will be set and assessed; concern about the additional obligations on councils; and other significant legislative changes being introduced over the next few years such as DRS, EPR and changes to the WEEE Regulations.

A few organisations supported the introduction of statutory recycling targets but opposed reuse targets, reiterating concerns made under the proposed further action to ‘Review the feasibility of setting reuse targets’ under the ‘Reduce and reuse’ strategic aim.

The need for a nuanced, flexible approach to setting local recycling and reuse targets was raised, with respondents emphasising the need to consider regional and geographic variations. The following were flagged as important by at least one respondent:

- quality and extent of local recycling service provision
- the nature of the housing stock, including consideration of the percentage of multi-occupancy properties
- urban/rural differences in garden access and size, and the impact this has on garden waste rates
- population density
- the demographics of the local population

A few added that local recycling and reuse performance targets should consider the challenges that remote, rural and island communities face, for instance a lack of recycling infrastructure and limited opportunities for reuse. Others discussed the need to set realistic targets which do not result in undue burdens and penalties for local authorities.

Some noted that, for best results, local authorities will require support with service planning, implementation and citizen engagement. Others reiterated the need for adequate financial resources to underpin the measures.

“As new statutory targets will necessitate legislative changes and impose additional legal burdens on councils, full funding from the Scottish Government is essential to enable compliance with any new duties.” – LARAC

Some comments focused on the timescale for this action, with a few agreeing that the 2030 timeframe proposed is sensible given the need for further research and the range of policy and legislative changes which are ongoing in parallel. However, some organisations, including RMAS and SUEZ Recycling and Recovery UK Limited, expressed disappointment at the long-term timeframe proposed.

A few organisations in the retail and packaging sector proposed having separate targets for ‘dry recycling’ (e.g. packaging and other similar materials) and organics (food waste and green garden waste).

While supportive of this further action, Trivium Packaging opposed setting recycled content targets for metal packaging, discussing differences between the outcomes of metal recycling versus plastic recycling.

“On no account should recycled content targets be set for metal packaging... Metal recycles forever and a huge and dependable recycling economy and infrastructure already exists to the benefit of carbon reduction. Recycling metal saves the carbon of initial manufacture regardless of whether or not there is recycled content in packaging... This is unlike plastics, where the inclusion of recycled content is intended to provide an outlet for end-of-life plastic that would otherwise go to landfill, incineration or the environment and where a plastic packaging tax has been used in an attempt to create a viable market for recycled material.” – Trivium Packaging

Strengthen Householder’s duty of care in relation to waste.

This further action was met with a mixed response; some respondents supported the proposal to strengthen householder’s duty of care in relation to waste, welcoming the introduction of new measures which disincentivise waste crime. Fife Council expressed particular support for measures which promote responsible use of third parties to dispose of waste by householders, noting that citizens may not be aware they are still liable for waste they have disposed of in this way. However, organisations from a mix of sectors caveated their support with calls for additional resource to improve capacity for enforcement procedures.

“Highland Council Officers support the proposal to strengthen Householder’s duty of care in relation to household waste. However, the ability to make effective use of these new powers will only be possible through the provision of additional resource at a local government level in order to undertake the investigations and administration processes to identify and enforce potential breaches of this duty.” – The Highland Council

Some disagreed with introducing measures which focus on penalising households, raising concerns about the impact on vulnerable people and the additional administrative burden placed on local councils. A few questions were raised about the enforcement of the strengthened duty of care, including queries about how those using communal bins would be subject to enforcement action and the consequences of not paying fines.

Give local authorities more tools to support household recycling and reduce contamination.

As with the previous further action, this proposal received a mixed response. Some respondents were supportive of this further action, reflecting on the significant costs attached to addressing contamination in recycling and agreeing that this could have a positive impact on recycling buy-in and quality.

“We do welcome this. Failure to use services correctly has consequences, not only for the local authority and the environment but also for other citizens who have to pay for the financial costs associated with this.” – City of Edinburgh Council

However, others disagreed with imposing punitive measures on non-compliant households, describing stricter enforcement as potentially “unfair” due to the lack of clarity among householders about recycling procedures. Specific concerns were raised about the impact of the measures on vulnerable people, including those with disabilities or mental health issues. A few expressed concerns about financially penalising those who may struggle to adhere to the correct recycling procedures due to physical or mental health conditions and suggested that exemptions will need to be applied in some cases.

A few respondents argued that greater impact could be achieved through enhanced producer responsibility and improvements in recycling service provision.

“We would caution against imposing stricter rules and enforcement on households. As our research has demonstrated (Holmes et al., 2023), not only is this likely to be highly costly for local authorities but runs the risk of further ‘turning off’ households from engaging with and appreciating the benefits of recycling. As we advocate the most important thing to improve recycling rates is to make things easier for households in the first place. Much of this must start higher up along the supply chain (product design) and filter through to straightforward waste regimes.” – 'One Bin to Rule Them All' Team, University of Manchester

Undertake a review of waste and recycling service charging.

Most respondents who commented on this further action welcomed a review of waste and recycling service charging. Aberdeenshire Council argued that this further action should be upgraded to a priority action, noting that the outcome of the review would be fundamental to local authority services and will potentially affect the statutory Code of Practice.

A few warned that the removal of waste charges in areas where these are currently in place would have a significant impact on income for local authorities and additional funding would be required to address the funding gap which would be created.

A few respondents supported a move to a Direct Variable Charging⁵ model, considering this a progressive step towards enhancing recycling quality and incentivising waste reduction. United Kingdom Without Incineration Network (UKWIN) echoed this, noting that the case study examples of this published alongside the consultation show this to be a fairer and more circular approach. However, a few individuals opposed charges for such services, suggesting that this may lead to increased instances of waste crime and that costs should be borne by producers.

Dundee City Council requested more information on the requirement to collect garden waste separately, and whether the Controlled Waste Regulations will be amended to remove the right to charge for this.

Review the monitoring and reporting framework for local authority waste services.

Few respondents commented directly on this further action; those that did were supportive of a review of the monitoring and reporting framework for local authority waste services. A few felt that improvements in data collection, collation and analysis processes will be critical in monitoring progress towards a circular economy. LARAC urged the adoption of user-friendly systems and called for funding for local authority data officers to streamline administrative processes. Aberdeen City Council advised that consideration should be given to streamlined, meaningful reporting, and avoiding duplication and unnecessarily increasing the burden on local authorities.

Develop options and consult on the introduction of end destination public reporting of household recycling collected.

Most comments on this further action were supportive, with respondents reflecting on the benefits of public reporting on household waste end destinations. These included: increased transparency in the waste management processes; greater public trust in services; and increased understanding and awareness of waste treatment processes. Some respondents agreed that this may lead to increased household recycling rates, with a few pointing to findings from research conducted by INCPEN, which suggests that a lack of information on what happens to recycling is the top reason that negatively influences citizens participation in recycling. The need for greater transparency was emphasised by a few individuals.

“People need to understand what happens to their recycling when they dispose of it, there is not enough transparency on how the waste is treated/re-processed. People think they are wasting their time and cannot see what value their waste has e.g. a large proportion of the population are likely to understand the value in an aluminium can or a glass bottle but less likely to understand how their food waste could generate energy or plastic film could be made into a construction board.” – Individual

United Kingdom Without Incineration Network (UKWIN) questioned the proposed timeframe of this action, suggesting it could be accelerated. They also advised that end reporting should be extended beyond household waste to include commercial waste.

⁵ Direct Variable Charging is a system for waste collection in which households are charged according to the amount of waste they produce.

Moray Council advised that public information about household waste end destination is already available via the waste data flow tool, and cautioned that this further action could result in a duplication of efforts. Glasgow City Council noted that local authorities already endeavour to obtain information to comply with the duty of care requirements, and advised that more emphasis should be placed on the waste treatment supply chain to provide all relevant information to assist local authorities meet these requirements.

While supportive of the ambition to increase transparency within the waste management system, The Highland Council felt that this responsibility should not lie with local authorities but should instead fall to treatment providers and to the regulator, who hold and record this information as part of their existing legal duties. West Lothian Council echoed this, noting that placing the primary responsibility on councils will create additional cost and sub-optimal outcomes which could be avoided by placing a parallel duty on all stages in the reprocessing chain.

3.2.2 Further actions under Section 2: Commercial recycling

Conduct a national compositional study of waste from commercial premises.

There was broad support for this action, with a few respondents recognising the value of a national compositional study of commercial waste in addressing gaps in data and subsequently enhancing service provision and increasing compliance with requirements.

“HIE backs the need for a national compositional study of waste for commercial premises, as there is currently no detailed national data to refer to. By improving the quality of data available it will be possible to identify priority materials and the sectors requiring further interventions.” - Highlands and Islands Enterprise

A few welcomed the commitment to an ongoing programme of commercial waste analysis, noting that this will help to evaluate the impacts of upcoming policy interventions affecting the waste management system. A small number advised that the compositional study sample should include a wide range of business types, ensuring variety in size, location and sector.

“The compositional study should also, if possible, consider a range of different business types to identify composition based on business type as each business will have different waste/recycling/reuse streams based on what their primary function is e.g. office, retail, construction, etc.” – Aberdeenshire Council

A few local authorities said that they will struggle to support the delivery of a compositional study of commercial waste due to budget and capacity constraints. Some felt that a compositional analysis of commercial waste will be a difficult undertaking given the wide range of business waste streams.

Aberdeenshire Council argued that this further action should be upgraded to a priority action, noting that findings from the compositional study could feed into the co-design of commercial recycling services.

Investigate further steps to promote business-business reuse platforms.

Most respondents who commented on this further action welcomed exploration of measures to encourage business-to-business reuse platforms.

“We strongly agree with the proposed further action to investigate further steps to promote business-business reuse platforms by 2027. The Scottish Government has an essential role to play in bringing businesses together and helping create ecosystems for the reuse system, overseeing the platform and its operations.” – Institute of Chartered Accountants in England and Wales

Scottish Water noted a desire to see a database of Scottish business assets and waste that can be used by other businesses to create products and facilitate the reuse of waste streams. RMAS shared examples of existing business-to-business reuse platforms including WARP IT, an office furniture and equipment resource distribution network. It was noted that public and commercial awareness are critical to the success of such sites, and support to publicise them would be beneficial.

As with previous actions relating to reuse, a few organisations felt that the responsibility of driving such initiatives should lie with producers rather than local or national government.

One anonymous organisation highlighted the limitations of reuse platforms for paper and cardboard-based products and packaging, noting that recycling such materials can have advantages over reuse in terms of usability and sustainability.

While supportive of actions aimed at helping businesses to adopt circular business models, Scottish Enterprise found this particular further action “confusing and difficult to understand.” They felt that this section of the Route Map simply describes ways in which businesses can innovate and does not relate to creating a business-to-business reuse platform.

4. Decarbonise disposal

This chapter provides analysis of responses to Question 5 and 6, which explored views on the priority and further actions identified under the Decarbonise disposal strategic aim.

4.1 Decarbonise disposal: priority actions

Q5: To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	36	51	7	6	11	45
All respondents (%)	156	23	33	4	4	7	29
All answering (%)	111	32	46	6	5	10	-
Individuals (%)	41	49	17	2	15	17	-
Organisations (%)	70	23	63	9	0	6	-
- Retail & packaging	12	42	58	0	0	0	-
- Third sector	15	20	33	20	0	27	-
- Local Authority	15	13	80	7	0	0	-
- Public body	5	20	80	0	0	0	-
- Waste management	6	33	50	17	0	0	-
- Construction / Dev	5	20	80	0	0	0	-
- Other	12	17	75	8	0	0	-

Among those who answered Q5, 78% agreed to some extent with the priority actions proposed in the Decarbonise disposal strategic aim; 32% strongly agreed and 46% agreed. A further 6% were neutral and 15% disagreed.

Two thirds (66%) of individuals who answered expressed support for the priority actions, with half (49%) strongly agreeing. Although strong agreement was lower among organisations (23%), a clear majority (85%) agreed to some extent. All public bodies, retail and packaging and construction and development organisations who answered supported the proposals, as did most local authorities and other organisations (93% and 92% respectively). However, just over half of third sector organisations agreed to some extent, with 20% neutral and 27% strongly disagreeing. This was the highest level of strong disagreement across the closed questions. Only two of these third sector organisations left comments elaborating on their disagreement; both are noted below.

Question 5 received 83 open text comments. Some respondents provided overall feedback on the Decarbonise disposal strategic aim. For example, some expressed broad support, with RMAS describing this section of the Route Map as an “essential component of the strategic framework necessary to transition to a circular economy.”

However, a few individuals disagreed with the inclusion of this strategic aim altogether, arguing that the actions in the Route Map should focus on cutting consumption and avoiding waste at source. Conversely, others recognised that there are currently residual waste materials that cannot be avoided, reused or recycled, and felt it is therefore important to ensure that these are disposed of in a way that minimises environmental and climate impacts.

As with other questions, some expressed the view that the proposals lack urgency and ambition, and a few respondents discussed the importance of ensuring that the actions contained within this strategic aim work cohesively alongside upcoming Deposit Return Scheme and Extended Producer Responsibility initiatives.

Develop and deliver a Residual Waste Plan to 2045.

There was broad support for this priority action, with several respondents from different sectors welcoming plans to develop and deliver a long-term Residual Waste Plan. A few described the potential benefits of the plan, suggesting that it will provide strategic direction, allow better understanding of waste volumes and compositions and lead to more informed decision-making on how best to allocate resources. A few respondents were particularly supportive of plans to explore new technologies and innovation aimed at reducing the environmental impact of waste disposal, and others welcomed the proposal to convene a diverse Residual Waste Panel to provide expert development, coordination and delivery of the plan.

“Fife Council support measures for a long-term strategy on residual waste. The Council want as little as possible going to landfill or Energy from Waste (EfW) so reporting on investigation of new technologies that could deal with hard to recycle materials or how to manage unavoidable wastes would help local authorities in their long-term disposal aims.”
– Fife Council

CIWM Scotland expressed approval for this priority action but emphasised the importance of establishing clear and tangible carbon measurements to establish baseline costs which will assist understanding the benefits and challenges of decarbonising waste streams.

Keep Scotland Beautiful advised that the Residual Waste Plan should identify a clear pathway for the appropriate composting of single-use packaging that is promoted as being compostable but often ends up in landfill due to a lack of appropriate composting facilities.

A few respondents called for a more ambitious timeframe to be implemented for this action, and a small number requested the inclusion of detailed action plans, costs and visible timelines within the Residual Waste Plan.

Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector.

Several respondents expressed support for this priority action, with a few commenting that industry bodies will have valuable and necessary insight into the development of a plan to minimise the carbon impacts of the Energy from Waste⁶ sector.

“HIE supports the facilitation of the development of a Sector-Led Plan as a specific strand of the residual waste plan to minimise the carbon impacts of the Energy from Waste Sector. We acknowledge that Waste industry ownership of this sector-led plan is important to ensure the economic and environmental viability of the plan and that a significant impact can be achieved on a voluntary basis.” – Highland and Islands Enterprise

However, some respondents, including a few individuals and third sector organisations such as United Kingdom Without Incineration Network (UKWIN), raised concerns about the ‘sector-led’ aspect of this proposal, advising that the vested interests of the incineration/waste disposal sector, such as desire to protect commercial profits, may lead to insufficient action being taken.

“We feel there is a terrible risk in allowing the waste disposal sector to determine the policies that will affect it, as for-profit corporations will prioritise their profits and market share, and the direction of policy overall, for their own, rather than societal and global benefit as a whole.” – Parents for Future Scotland

Some discussed the need for a collaborative approach, advising that different bodies including operators within the resource/waste management sector, environmental non-governmental organisations (eNGOs) and community groups should be involved in the process. For example, RMAS proposed an approach which involves a group with network-wide representation from incineration service providers, an independent Chair and an independent carbon analyst.

Some strongly endorsed the proposed measures to end the unnecessary incineration of plastics. However, two respondents noted that existing long-term contracts between Energy from Waste operators and local authorities may pose challenges, advising that consideration should be given to how these contracts can be adapted in the future.

While most respondents who commented on this strategic aim were generally supportive of efforts to minimise the carbon impacts of the Energy from Waste sector, a few questioned whether this sector should be considered within the Route Map at all, arguing that incineration is not part of a circular economy.

CircularChem raised concerns about the proposal to explore carbon capture utilisation and storage (CCUS) as an option for Energy from Waste noting that such technologies are currently still in their infancy and are not close to commercial readiness on the scale needed.

⁶ Energy from Waste (EfW) refers to the conversion of non-recyclable waste into usable forms of energy (e.g. electricity or heat) through processes such as incineration

Suggestions for additional priority actions

Scottish Environmental Services Association criticised the absence of a specific, costed measure on removing plastic from residual waste, which they described as key to decarbonising waste disposal.

Friends of the Earth Scotland felt that this aspect of the Route Map does not adequately reflect the conclusions and recommendations from the recent independent review on incineration. While supportive of the overall strategic aim, Anaerobic Digestion and Bioresources Association felt that greater recognition and support for Anaerobic Digestion is warranted within this section of the Route Map.

Other suggestions for additional priority actions under the decarbonise disposal strategic aim included: preventing new permits being issued for new or expanded incineration capacity; introducing the capacity cap for incineration; and adopting a more intensive advanced sorting all-in plastics collection approach.

4.2 Decarbonise disposal: further actions

Q6: To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	29	54	11	6	7	49
All respondents (%)	156	19	35	7	4	4	31
All answering (%)	107	27	50	10	6	7	-
Individuals (%)	40	40	25	10	10	15	-
Organisations (%)	67	19	66	10	3	1	-
- Retail & packaging	12	42	58	0	0	0	-
- Third sector	14	21	50	21	0	7	-
- Local Authority	15	7	60	20	13	0	-
- Public body	4	25	75	0	0	0	-
- Waste management	6	17	83	0	0	0	-
- Construction / Dev	4	25	50	25	0	0	-
- Other	12	8	92	0	0	0	-

Agreement with the further actions to 2030 across the Decarbonise disposal strategic aim was also high; 78% agreed to some extent, including 27% who agreed strongly.

Levels of support for the further actions were similar to those for the priority actions among individuals and organisations who answered Q6, with 65% and 85% respectively agreeing to some extent. All retail and packaging, waste management, public bodies and other organisations agreed to some extent with the proposals. While lower, a majority of those in other sectors were also in agreement, including 67% of local authorities, 71% of third

sector organisations and three quarters (75%) of construction and development organisations.

Question 6 received 69 open text responses. Overarching comments on this set of further actions were mostly positive; for example, Industry Council for Packaging and the Environment (INCPEN) expressed strong support for the further actions outlined up to 2030, describing them as “a well-considered list of actions which look set to minimise the impact of disposal in Scotland if delivered successfully.” However, Fife Council raised concerns that the timescale for the further actions is unrealistic and should be delayed to give sufficient time to plan targets and implement measures.

Support the inclusion of Energy from Waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal.

There were mixed views on this further action. Some respondents expressed support for the proposal to include Energy from Waste in the UK ETS as part of a wider drive to reduce the carbon impact associated with residual waste. Scottish Water advised that Energy from waste in the Route Map should also include energy generated from biosolids.

However, some concerns were raised about the inclusion of Energy from Waste in the UK ETS, including:

- Energy from Waste operators may seek to pass on any associated costs to their customers, many of which will be Local Authorities
- Compliance with the ETS and investment in new low-carbon disposal technologies could result in significant costs for local authorities
- The ETS will defer investment in low carbon infrastructure
- The proposed changes may require renegotiations or adjustments to existing waste contracts, which could entail legal complexities and potential disputes
- Lack of alternatives to Energy from Waste for some items such as POPs
- Specific challenges for rural areas and islands, including transportation distance, cost and capacity issues

The proposal to investigate other fiscal measures to incentivise low carbon disposal was welcomed, and some fiscal measures were suggested by respondents. These included: measures to support the demand for recycled materials, including a long-term escalator on the plastic packaging tax and a 50% recycled content mandate; the introduction of a middle band of Landfill Tax that rewards biostabilisation prior to landfill; zero VAT rating plastic only residual waste collections; and a review of Scottish Landfill Tax rates post-2028 to maintain an appropriate balance between unit cost of Energy from Waste and landfill in the medium term.

Review and target materials currently landfilled to identify and drive alternative management routes.

There was broad support for this further action; it was strongly endorsed by various organisations including the Scottish Ecological Design Association and British Glass. A few requested clarity on which waste streams will be considered for alternative

management routes for landfill, and others welcomed the opportunity to respond to the upcoming call for evidence.

The 'One Bin to Rule Them All' Team at the University of Manchester recommended consideration of the 'plastics hierarchy of fates', which was created as part of research at University of Manchester, advising that this could help in the identification of alternative treatment options for waste streams that have high amounts of plastics.

However, United Kingdom Without Incineration Network (UKWIN) did not support pursuing a targeted approach, suggesting that effort should instead focus on all residual waste sent to either landfill or incineration in order to reduce the overall volume of residual waste. In addition, The Highland Council expressed concern about the potential loss of most landfill capacity in Scotland, and what this would mean for dealing with material exempt from the Landfill Ban, which is unsuitable for shredding and sending to Energy from Waste. They advised that an appropriate level of landfill capacity must be maintained across Scotland into the future.

Facilitate the co-production of guidelines for effective community engagement.

Most comments on this further action were supportive, with respondents from a mix of sectors welcoming efforts to enhance and increase community engagement. A few recommended that communities and third sector organisations should be involved in the process of producing the guidelines. As with other actions related to community engagement, a few respondents advised that engagement with the public must take place through multiple channels, including a mix of online and in-person opportunities.

United Kingdom Without Incineration Network (UKWIN) questioned the placement of this further action within the Decarbonising disposal section of the route map, noting that the recommendation cited from the incineration review report related more broadly to waste management as a whole, not incineration.

Increase the capture of landfill gas.

Comments on this further action were mostly supportive. Organisations including a few local authorities, LARAC, Highlands and Islands Enterprise and SUEZ Recycling and Recovery UK Limited expressed support for plans to increase the capture of landfill gas, with Stirling Council noting this is of particular importance in the context of large scale site closures across Scotland. The Association for Renewable Energy and Clean Technology recommended that this further action should be upgraded to a priority action.

“We also ask the Scottish and wider UK Government to investigate and announce how they intend to support existing energy from waste capacity once projects begin to reach the end of their Renewables Obligation (RO) support. This applies to both waste wood sites and energy from waste with CHP. One suggestion on this would be increasing the priority level of action ‘Increase the capture of landfill gas’.” – The Association for Renewable Energy and Clean Technology

A few respondents warned of the potential costs associated with this proposal, and Comhairle nan Eilean Siar recommended that further work should be carried out to

minimise the release of landfill gas and maximise the use of gas for energy generation rather than being flared.

CircularChem recognised the importance of increasing gas capture from existing landfill in reducing methane emissions to the atmosphere, but cautioned that increasing landfill capacity is at odds with the vision of the Route Map.

5. Strengthen the circular economy

This chapter presents analysis of responses to Questions 7 and 8, which explored views on the priority and further actions identified under the Strengthen the circular economy strategic aim.

5.1 Strengthen the circular economy: priority actions

Q7: To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	47	46	11	9	9	34
All respondents (%)	156	30	29	7	6	6	22
All answering (%)	122	39	38	9	7	7	-
Individuals (%)	41	51	15	2	15	17	-
Organisations (%)	81	32	49	12	4	2	-
- Retail & packaging	15	53	33	13	0	0	-
- Third sector	16	38	25	6	19	13	-
- Local Authority	14	21	71	7	0	0	-
- Public body	8	50	38	13	0	0	-
- Waste management	7	14	71	14	0	0	-
- Construction / Dev	6	17	67	17	0	0	-
- Other	15	20	60	20	0	0	-

Three quarters (76%) of those who answered Q7 agreed to some extent with the priority actions in the Strengthen the circular economy strategic aim; 39% strongly agreed and 38% agreed. A further 9% were neutral and 14% disagreed.

Among individuals who answered, two thirds (66%) agreed to some extent, including half (51%) who agreed strongly. Overall, 81% of organisations agreed, with at least 80% of all sectors agreeing to some extent with the exception of third sector organisations (63%). However, 32% agreed strongly with the priority actions; this was the highest level of strong agreement recorded across the four strategic aims. Strong agreement was particularly high among retail and packaging organisations (53%), public bodies (50%) as well as among third sector organisations (38%). Disagreement among organisations was limited to third sector organisations, of which one third (32%) disagreed.

There were 105 open text comments submitted under Q7. While the overall ambitions of this strategic aim were broadly welcomed, some respondents felt the priority actions lacked detail, specificity and ambition. For example, they were described as “weak”, “vague”, “ambiguous”, “high-level” and “lacking substance”, and there were calls for more detail, specificity or commitments to direct action. For example, the 'One Bin to Rule Them

All Team at the University of Manchester felt this section requires more specific objectives and suggested that alignment with the EU's circular economy action plan would be beneficial.

As with other sections, a few respondents urged greater consideration of the costs associated with the actions set out. Additionally, some respondents emphasised the importance of ensuring that the proposed actions do not undermine, hamper or interfere with the implementation of legislation related to Extended Producer Responsibility and the Deposit Return Scheme.

A few raised general concerns that overall, the Route Map is too narrow in scope and focuses too closely on environmental measures, without addressing the wider economic drivers and levers necessary to deliver a circular economy.

Develop a Circular Economy strategy every five years.

Most comments on this priority action were supportive, with respondents from a mix of sectors welcoming the introduction of a requirement for Scottish Ministers to publish or refresh a circular economy strategy every 5 years.

“We fully support the pragmatic approach of reviewing the CE strategy every five years and welcome the opportunity to review success and help support any gaps in reaching targets.” – McDonalds UK and Ireland

Some organisations felt that a national strategy will give a clear indication of priority sectors and help key stakeholders to better understand the strategic direction of travel within a circular economy context. A few others, including Waste and Resources Action Programme (WRAP) added that publishing a five-year Circular Economy strategy will help Scotland to react and adapt to rapidly changing environmental issues and regulatory landscapes.

“We agree that the development of a Circular Economy Strategy at national level will help provide clarity over the direction of travel and priority sectors. A cross-cutting approach will also strengthen systems thinking which is critical in achieving long-term and sustainable change. Revising the strategy every five years will ensure it remains current and takes into consideration any advancements towards targets.” – Glasgow City Council

There were calls for extensive stakeholder engagement to inform the development of the strategy, including input from local government, the waste management sector, communities and businesses from various sectors.

A few emphasised the importance of public education and awareness about the circular economy and called for this to be a priority area with the Circular Economy strategy. Others called for the strategy to recognise the role of anaerobic digestion as a circular waste management option that can contribute to Scotland's circular economy and net zero goals. A few respondents from the third sector called for both carbon and material consumption reduction targets for Scotland to be included in the strategy.

While some recognised the need for a Circular Economy strategy, a small number considered this a low priority, arguing that the implementation of direct producer

responsibility measures (e.g. regulation) is of greater importance than publishing a strategy document. Others, including Common Weal, made similar points, noting that it is important that the renewal of the strategy does not become a distraction to implementing the aims and objectives within it.

“Clear and effective actions with no strategy document will make change: a strategy document without the required actions will not.” – Action to Protect Rural Scotland

“It may be better to concentrate on actually achieving the targets set out in any strategy rather than create a new strategy altogether.” – Stirling Council

On timings, Stirling Council questioned the feasibility of publishing a strategy every five years, and The Royal Town Planning Institute Scotland, highlighting the vital role that planning can play in moving towards a circular economy, suggested that a 10-year period may promote better synchronicity with NPF4 and Local Development Plans. The Food and Drink Federation felt a longer term strategy would be best, suggesting a strategy to 2045 in line with the Scottish Government’s net zero commitments with a refresh every 5 years. They also highlighted overlap in the Scottish Government’s Climate Change Plan, Net Zero commitment and Circular Economy Route Map and proposed combining these into one overarching long-term strategy with KPIs and refreshes every 4-5 years. Two respondents suggested that annual updates to the Circular Economy Strategy should be published.

A few encouraged the development of strategies at a local and community level as well as national, and there were calls for greater discussion of how the Circular Economy will align with other national strategies.

“We agree with the priority action that a refreshed Circular Economy strategy should be developed every five years. However, the key issue is that the strategy aligns with other Scottish Government strategies (especially the National Strategy for Economic Transformation, Innovation Strategy, Environment Strategy and Climate Change Plan) so it genuinely becomes a whole of Government approach.” – Scottish Enterprise

Setting new circular economy targets beyond 2025.

There was broad support for this priority action, with some reflecting on how targets will help to drive action and consistently monitor progress. A few organisations supported the move away from weight-based metrics towards factors like carbon emissions, noting that this shift allows for a more comprehensive understanding of the actual costs associated with material use and disposal. Others welcomed the Route Map’s recognition of the need for a robust monitoring framework to be put in place to accompany any new targets.

The need for outcome-based targets which are realistic, flexible and achievable was discussed by a few respondents. Edinburgh Chamber of Commerce added that targets need to be clear, measurable and relatable for businesses and other stakeholders. As with the development of the circular economy strategy, there were calls for extensive stakeholder engagement to inform the creation of targets, the data required and the frequency of reporting.

“In Valpak’s experience targets have proven to be an effective instrument at the disposal of regulators in encouraging the environmentally sound management of particular resources at end-of-life. As such, we support the installation of circular economy targets and hope that any future targets are the result of industry engagement, including but not limited to formal consultation.” – Valpak

A few requested more detail on what the targets might look like, with one anonymous organisation withholding support for this priority action until the targets are defined, noting they would not support reuse targets for paper and board. LARAC highlighted the importance of extending the new circular economy targets to include producers and manufacturers.

Scottish Environment LINK described this priority action as urgent and requested clarity on the timeframe. They advised that the Scottish Government should set these targets as soon as possible or by 2025 at the latest.

A few suggested that terms such as ‘recycling’, ‘downcycling’, ‘waste’ and ‘re-use’ should be clearly defined to assist with the delivery and monitoring of outcomes. Comhairle nan Eilean Siar advised that the new circular economy targets must be aligned with Producer Responsibility so that any new financial burdens are included in funding streams such as EPR. With regard to the setting targets for the construction industry, the UKRI Interdisciplinary Circular Economy Centre for Mineral-Based Construction Materials advised that targets should not be limited to waste, but also include factors such as reuse, refurbishment, longevity of materials, decarbonisation, or protection of natural capital.

Suggestions for additional priority actions

A few respondents, including Ostrero, suggested including a priority action about promoting education, behaviour and mindset change. The Recycling Association recommended including a priority action aimed at developing circular product standards using end-of-waste criteria.

5.2 Strengthen the circular economy: further actions

Q8: To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	44	53	6	10	7	36
All respondents (%)	156	28	34	4	6	4	23
All answering (%)	120	37	44	5	8	6	-
Individuals (%)	41	49	17	2	20	12	-
Organisations (%)	79	30	58	6	3	3	-
- Retail & packaging	14	57	29	14	0	0	-
- Third sector	15	27	47	0	13	13	-

- Local Authority	15	13	87	0	0	0	-
- Public body	6	50	50	0	0	0	-
- Waste management	8	25	75	0	0	0	-
- Construction / Dev	6	33	67	0	0	0	-
- Other	15	20	60	20	0	0	-

Over four fifths (81%) of those who answered Q8 agreed with the further actions to 2030 across the Strengthen the circular economy strategic aim. This was the highest level of total agreement recorded across the four strategic aims. Over one third (37%) strongly agreed, 44% agreed, 5% were neutral and 14% disagreed with the further actions.

Individuals held almost identical views of the further actions compared to the priority actions, with 66% agreeing to some extent and 49% agreeing strongly. Among organisations who answered, 89% agreed to some extent including 30% that strongly agreed. All local authorities, public bodies, waste management and construction and development organisations agreed with the proposals. While 86% of retail and packaging organisations agreed, over half (57%) of these organisations agreed strongly with the further actions; this was the highest level of strong agreement recorded by a sector across the four strategic aims. Although 73% of third sector organisations agreed with the further actions, one quarter (26%) expressed their disagreement.

Question 8 received 97 open text comments. Some respondents expressed broad support for the three cross-cutting themes identified under the Strengthen the circular economy strategic aim, agreeing that these are all necessary areas of focus in the transition to a circular economy.

“British Glass welcomes the further strategic actions up to 2030, which maximise impact of circular economy measures, tackle cross-cutting areas to support progress across the waste hierarchy, and contribute to robust monitoring and evaluation of progress. It’s sensible that these are centred across the three themes: research, data and evidence; sustainable procurement; and skills/training.” – British Glass

Review and refresh Scotland’s Waste Data Strategy’s action plan.

Few respondents commented on this further action specifically, but those who did were supportive, recognising the need for empirical data to underpin decision-making. The Recycling Association suggested that it could be beneficial to upgrade this to a priority action as the Waste Data Strategy action plan might help inform other aspects of the Route Map. The Scottish Ecological Design Association also considered the review of waste data capture a high priority, particularly for the construction sector.

The Association for Renewable Energy and Clean Technology expressed support for this further action, but emphasised the importance of making the action plan reasonable and actionable through collaboration with industry stakeholders.

Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities.

Most comments on this further action were supportive, with respondents welcoming the commitment to a continued programme of research in the identified areas. Circular Communities Scotland recommended that this action be upgraded to priority status.

A few suggested specific areas for future research, including: behavioural interventions to reduce contamination in organic waste recycling; international examples of best practice; and trials of innovative technologies, such as anaerobic digestion and hydrothermal carbonisation, to transform grass cuttings from waste into resources.

The Institute of Chartered Accountants in England and Wales recommended that the 'Research, data and evidence' cross-cutting theme should be expanded to include innovation in technologies that support transparency and traceability of supply chains, products and materials, as well as other aspect of the circular economy plan.

Develop public procurement opportunities to reduce the environmental impact of public spending.

There was particularly strong support for this further action, with respondents welcoming efforts to increase the sustainability and circularity of public procurement. A few respondents described this further action as key in supporting Scotland's transition to a circular economy and others recognised the opportunity for public procurement to help achieve positive environmental, economic, and social outcomes.

"Mandating circular economy and climate obligations in procurement strategies for public bodies would help reuse choices become more mainstream within the public sector and help circular enterprises grow and expand." – Circular Communities Scotland

Scottish Environment LINK suggested that this action should be upgraded to priority status, with additional focus on reforming public procurement so that it contributes to Scotland's transition to a circular economy by, for example, using leasing models, refurbished equipment, and imposing take-back requirements on suppliers. Scottish Water suggested developing a public procurement approach in line with the Climate Change (Scotland) Act 2009.

One anonymous organisation requested the implementation of a bio-preferred procurement scheme where the use of bio-based feedstocks is incentivised over fossil-based incumbents. Aberdeenshire Council advised that consideration should be given to the requirements to purchase goods with recycled content or recycled products, noting that for certain industries, there is a need to ensure that goods with recycled content/recycled products meet the same standards as new products from a safety aspect.

Support greater uptake of green skills, training, and development opportunities.

There was broad support for this further action; it was described as 'vital', 'essential' and 'very important' by a few respondents. Several respondents reflected on the need to upskill the workforce and ensure that the education and skills systems are prepared to support an effective transition to a more circular economy.

“RMAS strongly agrees with all measures aimed at supporting training, education and development of skills within the sector and is a strong advocate for the opportunities within the industry. The current system and levels of financial support for education and training in the sector are limited and there need to be clear links at Government level to help deliver long-term change.” – Resource Management Association Scotland (RMAS)

Some called for circular economy education to be integrated into school curriculums to embed the principles of circularity within younger generations.

A few respondents reflected on the training and workforce development needs of specific industries, such as the construction, planning and agricultural sectors. For example, the Construction Industry Training Board (CITB) noted that in order to achieve a circular economy, the current construction workforce must become skilled in maximising reuse; designing for optimisation; using standardisation; and minimising impact and waste. They also reflected on some of the challenges impacting the construction education and skills system including: budget cuts; the withdrawal of key funding streams such as the Flexible Workforce Development Fund for the academic years 2023-2024 and 2024-2025; and limited capacity to plan effectively, due to on-going reforms.

A few called for more detail on how the Scottish Government intends to finance the proposed measures to support greater uptake of green skills, training, and development opportunities.

6. Impact Assessments

This chapter provides an analysis of the four impact assessment questions. While the publication of the Route Map itself will not result in any direct impacts, the Scottish Government wishes to assess how a specific intervention may have an impact if introduced. The impact assessment questions cover equality, socio-economic considerations, island communities and business and regulation.

For further information, review the [impact assessments](#) that were published by the Scottish Government alongside this consultation.

Q9: Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment.

Of the 30 responses received under Q9, the most common theme was a desire for further and ongoing consideration of the potential impact of the proposals on protected groups, such as people with disabilities and mental health conditions, the elderly and those who face language barriers. A few emphasised that any enforcement activity must take into account the personal circumstances and individual needs of those with protected characteristics. Common Weal highlighted that those within the protected characteristics of disability, age, race, and sex are more likely to be food insecure, and would therefore more likely to be affected by any measures intended to reduce food waste.

The British Soft Drinks Association described the Equalities Impact Assessment as effective in addressing ‘pertinent considerations’ and did not feel any further information or evidence was required for consideration. Comhairle nan Eilean Siar agreed that they had “no areas of concern” with the Equalities Impact Assessment.

Glasgow City Council called for more detail on which parties will be involved in the co-design processes mentioned in various proposed actions.

A few individuals questioned the need for an equalities impact assessment on the Route Map, with one arguing the impact of the measures will be felt equally by “everyone”.

Q10: Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment.

There were 25 responses to Q10. Among those, the most common theme was concern about the socio-economic impacts of the proposals on low-income households, with some respondents emphasising the need to ensure that the proposals do not inadvertently adversely affect these groups. The British Holiday and Home Parks Association highlighted specific concerns around vulnerable and low-income households living on residential parks, noting that they may not be in a financial position to make significant changes to accommodate additional environmental changes and waste management. Dundee City Council cautioned that the proposals may inadvertently result in an unfair impact on those relying on surplus food, and advised that this should be considered moving forward.

Two respondents raised concerns about the socio-economic impact some proposals may have on rural communities given the additional costs and challenges with circularity and waste disposal in remote, rural and island towns.

A few respondents considered the Fairer Scotland Assessment to be adequate and felt that no further information or evidence needs to be considered.

Q11: Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment.

Nineteen comments were submitted under Q19. The most common theme among these was a call for greater consideration of the increased costs and additional challenges with circularity and waste disposal in remote, rural and island areas.

“Any changes to waste management and associated circular economy regulation that creates specific burdens on Island local authorities need to be identified and fully costed. If there is an additional financial burden on island authorities, additional financial support must be provided. If there are technical reasons why any element of any of the proposed plans cannot be implemented due to Island-specific restrictions (e.g. limited ferry capacity, Energy from Waste facilities not available on-island) an alternative solution or derogation must be permitted.” – Comhairle nan Eilean Siar

The Scottish Islands Federation Marine Litter Working Group felt that the challenges in relation to Marine Litter and the lack of facilities or support from Local Authorities to pick-up and recycle waste had not been adequately considered in the Impact Assessment.

Orkney Islands Council welcomed the inclusion of the Island Communities Impact Assessment, and the British Soft Drinks Association considered the document adequate and did not feel any further information or evidence was required for consideration.

Q12: Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact.

The most common theme among the 32 responses to Q12 was for a desire for further consideration of the financial impact of the proposals on businesses. A few respondents highlighted the lack of data, cost impact assessments and targets within the BRIA and called for more detailed evidence to be included. Others requested more specific consideration of the impact of the proposals on different types of businesses in terms of size, sector and rurality, stressing that a ‘one size fits all’ approach is not sufficient.

“We would ask that the Business and Regulatory Impact Assessment takes care to consider all different sizes and sectors of business, as the potential impact of these policies and actions could vary hugely depending on these factors.” – Edinburgh Chamber of Commerce

While the British Standards Institution welcomed the Scottish Government’s commitment to working collaboratively with the business community on the draft Route Map, the British Holiday and Home Parks Association felt there was a lack of transparency regarding which businesses and business groups have been consulted throughout the process. Some respondents called for greater collaboration with SMEs and industry bodies in order to fully

explore and understand the potential impact of the proposed measures on businesses. A number of respondents, including British Holiday and Home Parks Association and Scottish Wholesale Association volunteered to engage with the Scottish Government on further development of the BRIA. SUEZ Recycling and Recovery UK Limited suggested that a cross sector approach to the ongoing development of the BRIA should be adopted.

As with the other impact assessments, a small number felt that no further information or evidence should be considered within the BRIA.

7. Strategic Environmental Assessment (SEA)

This chapter provides an analysis of the four questions about the Strategic Environmental Assessment. For further information, review the [full document](#) that was published by the Scottish Government alongside this consultation.

Q13: What are your views on the accuracy and scope of the environmental baseline set out in the SEA Environmental Report?

There were 35 responses to Q13. Approximately a third of these responses expressed positive views about the accuracy and scope of the environmental baseline set out in the SEA Environmental Report; the report was described in comments as “comprehensive”, “accurate” and “robust”.

“The scope and environmental baseline of the SEA appears proportionate across the themes and priority actions to further understand the impacts across the various environmental topics from the Route Map.” – 'One Bin to Rule Them All' Team, University of Manchester

Others described the SEA as high level and lacking in detail, with calls for more timescales and specific examples. One respondent described the content as “aspirational” and Stirling Council stated that the SEA, while accurate based on current data, fails to account for population growth.

A few organisations, including RMAS and Dundee City Council welcomed the baselining exercise but advised it must be applied consistently to allow direct comparisons between regions and other nations.

Dovesdale Action Group felt that the SEA could be enhanced by including more commentary on the impact of failing to progress the Route Map’s actions on public health, food production and the national economy. Historic Environment Scotland noted that the ‘Our Place in Time’ strategy referenced in the SEA has now been superseded by Scotland’s new strategy for the historic environment, ‘Our Past, Our Future’ (OPOF) which was published in April 2023.

Q14: What are your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the SEA Environmental Report? Please give details of any additional relevant sources.

There was little consensus among the 38 responses to Q14. A few respondents described the predicted effects as ‘accurate’, agreeing that on the whole, the measures are likely to have a positive environmental impact. However, a few highlighted that the predicted effects are based on successful implementation of the measures in the Route Map, which can only be achieved through adequate resourcing and significant positive behaviour change.

“If all of the objectives of the draft Circular Economy and Waste Route Map are achieved, the predicted outcomes are all positive. However, the costs of implementation have yet to be established and a full package of funding made available. Local Authorities are not currently in a position to take on increased financial obligation, so this must be funded by producer responsibility or direct Scottish Government revenue support. There is also a substantial need to achieve behavioural change.” – Comhairle nan Eilean Siar

A few reflected on the increased resource required to transition to a circular economy and questioned whether the environmental impact of this had been adequately considered in the SEA. Mineral Products Association Scotland disagreed with the conclusion that the measures proposed in the draft Route Map will lead to reduced demand for primary aggregates, arguing there is little scope for this in light of the Scottish Government’s ambitions for housebuilding and infrastructure.

As with other questions, a few respondents felt that this aspect of the SEA lacked sufficient detail and evidence. Aberdeenshire Council described the predicted environmental effects as “loosely indicative” given the high-level nature of the Route Map. Stirling Council repeated concerns that the predicted environmental affects do not account for population growth.

Scottish Islands Federation Marine Litter Working Group Looking commented specifically on the SEA’s table of likely results, highlighting the “significant number of question marks” and suggested that further scoping is required before significant changes in legislation are initiated.

British Glass raised concerns that the reduction in the production of new components as a way of reducing Scotland’s impact on the environment will move production to other countries that may have less environmentally friendly production processes.

Very few respondents provided details of additional relevant sources to consider; a few recommended further consultation with communities, SMEs and industry bodies.

Q15: What are your views regarding potential reasonable alternatives, in reference to the approach set out in the SEA Environmental Report?

While Question 15 received 25 responses, few comments engaged directly with the subject matter of the question. Approximately half were wider comments on the Route Map as a whole, for example discussing concerns about overconsumption and overdevelopment of land, the role of big business in tackling climate change and concerns about the burden of the measures on local authorities.

Of the comments that did consider the approach to assessing reasonable alternatives as set out in the SEA, most were in agreement with the Scottish Government’s decision to not identify any additional alternatives at this stage given the broad and high level nature of the Route Map.

However, United Kingdom Without Incineration Network (UKWIN) and Dovesdale Action Group called for consideration of alternative options, including: all-in plastic collection, a ban on new incineration capacity, middle band of Landfill Tax for bio-stabilised material, and the introduction of an incineration tax to minimise leakages from the circular economy.

Comhairle nan Eilean Siar advised that any reasonable alternatives must be assessed individually and in context with local circumstances.

Q16: What are your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the SEA Environmental Report?

Question 16 received 24 comments. Most of these comments were supportive in nature, welcoming the approach to mitigation, enhancement and monitoring as set out in the SEA Environmental Report and recognising the need for a robust monitoring framework to support evaluation of the environmental effects of the Route Map.

A few emphasised the need for clear metrics and indicators of success, with Glasgow City Council suggesting that 'Cornerstone Indicators'⁷ could be considered as a way to assess the impacts of the Route Map.

Two respondents, while supportive of the approach, highlighted the additional resourcing such measures will require. Aberdeenshire Council advised that the approaches to mitigation, enhancement and monitoring will need to be flexible as actions and measures are developed and implemented.

⁷ [Dark matter labs website - Cornerstone Indicators](#)

8. Conclusions

Many individuals and stakeholders with detailed knowledge took part in the consultation, sharing their views on measures proposed by the Scottish Government to support Scotland's transition to a circular economy. This report provides a summary of the consultation responses; for more detail, readers are encouraged to review individual responses where permission was given for publication⁸.

Summary of level of support for each set of actions

Actions	% of those answering who agree or strongly agree
Reduce and reuse: priority actions	77%
Reduce and reuse: further actions	71%
Modernise recycling: priority actions	76%
Modernise recycling: further actions	76%
Decarbonise disposal: priority actions	78%
Decarbonise disposal: further actions	78%
Strengthen the circular economy: priority actions	76%
Strengthen the circular economy: further actions	81%

The table above shows consistently high levels of support for the actions within the four strategic aims, ranging from 71% the Reduce and reuse further actions, to 81% for Strengthen the circular economy further actions.

More nuance was provided in responses to the open-ended questions, with respondents setting out the reasons they either agreed or disagreed with measures, raising questions or concerns about some of the proposed actions, or providing caveats to their support.

The Scottish Government will use the consultation feedback and analysis presented in this report to refine proposals, with a view to publishing the final Circular Economy and Waste Route Map to 2030 later this year.

⁸ Responses are published on the Scottish Government's consultation website: <https://consult.gov.scot/>

Appendix A: Consultation Questions

Question 1: To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 2: To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 3: To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 4: To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 5: To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 6: To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

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

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 8: To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

[Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree / Not answered]

Question 9: Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment.

Question 10: Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment.

Question 11: Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment.

Question 12: Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact.

Question 13: What are your views on the accuracy and scope of the environmental baseline set out in the SEA Environmental Report?

Question 14: What are your views on the predicted environmental effects of the draft Circular Economy and Waste Route Map as set out in the SEA Environmental Report? Please give details of any additional relevant sources.

Question 15: What are your views regarding potential reasonable alternatives, in reference to the approach set out in the SEA Environmental Report?

Question 16: What are your views on the approach to mitigation, enhancement and monitoring of the environmental effects set out in the SEA Environmental Report?

Appendix B: Sectoral Classification

Given the range of sectors represented by respondents, analysts created a broad level of classification for analysis purposes. Respondents were assigned to one of the categories below based on the nature of their organisation.

Respondent profile

In total, 156 consultation responses were received. Most were submitted via the online consultation platform, Citizen Space. Those received in an alternative format, for example an email or PDF document, were reviewed separately by the research team.

Individuals provided 43 responses to the consultation; the remaining 113 were from organisations. To aid analysis, each organisation was assigned a sector or type. The largest share of organisational responses came from retail and packaging organisations, the third sector, and local authorities.

Table 1: Sectoral classification

Sector	n=	%
Retail & packaging	27	17%
Third sector	18	12%
Local Authority	15	10%
Public body	11	7%
Waste management	10	6%
Construction & development	9	6%
Other - Membership / representative body not aligned with another sector	6	4%
Other – Energy	5	3%
Other – Manufacturing	3	2%
Other – Consulting	3	2%
Other – Academia	3	2%
Other	3	2%
Individuals	43	28%

A note on the sectoral classification

Public bodies and local authorities were classified first. Organisations were then classified by their primary focus: retail and packaging, construction and development, and waste management. If an organisation did not fall into one of the three industries, they were classified by organisation type, i.e. third sector, membership body and other. If an organisation fell into two categories, such as waste management and a membership body, they were classified with their industry rather than their organisation type.

Not all organisations who responded to the consultation consented to their name being published. Those who consented in each category included:

Retail & packaging

AVA: The Vending & Automated Retail Association
Benders Paper Cups
British Glass
British Soft Drinks Association
Company Shop Group
Cosmetic, Toiletry and Perfumery Association
Edinburgh Chamber of Commerce
Food and Drink Federation
Foodservice Packaging Association
Huhtamaki UK Ltd
Industry Council for Packaging and the Environment (INCPEN)
McDonald's UK and Ireland
Metal Packaging Manufacturers Association
Scottish Beer and Pub Association
Scottish Grocers' Federation
Scottish Wholesale Association
Tetra Pak
The Packaging Federation
The Paper Cup Alliance
Too Good To Go
Trivium Packaging

Third sector

Action to Protect Rural Scotland
Circular Communities Scotland
CL:AIRE
Dovesdale Action Group
Evangelical Alliance Scotland
Fareshare Scotland
Friends of the Earth Scotland
Keep Scotland Beautiful
Parents for Future Scotland
Plantlife Scotland
Plastic-Free Dalgety Bay
Quakers in Scotland (Parliamentary Engagement Working Group)
Scottish Environment LINK
The Royal Society of Edinburgh
United Kingdom Without Incineration Network (UKWIN)

Construction & development

BEFS (Built Environment Forum Scotland)
Construction Industry Training Board (CITB)
KJ Tait
Mineral Products Association Scotland
Scottish Ecological Design Association
The Lighting Industry Association (The LIA)
The Royal Town Planning Institute Scotland

Local Authority

Aberdeen City Council
Aberdeenshire Council
Argyll & Bute Council
Comhairle nan Eilean Siar
Dundee City Council
Fife Council
Glasgow City Council
Moray Council
Orkney Islands Council
Renfrewshire Council
South Lanarkshire Council
Stirling Council
The City of Edinburgh Council
The Highland Council
West Lothian Council

Waste management

Anaerobic Digestion and Bioresources Association
CIWM Scotland
LARAC
Scottish Environmental Services Association
SRMA (Scotland Limited) Resource Management Association Scotland
SUEZ Recycling and recovery UK limited
The Recycling Association
Waste and Resources Action Programme (WRAP)

Public body

British Standards Institution
Consumer Scotland
Environmental Standards Scotland
Highlands and Islands Enterprise
Historic Environment Scotland
NatureScot
Scotland Excel
Scottish Enterprise
Scottish Water
South of Scotland Enterprise

Other - Membership / representative body not aligned with the sectors above

British Holiday and Home Parks Association
Federation of Small Businesses (Scotland)
Institute of Chartered Accountants in England and Wales
Institute of Environmental Management and Assessment
NFU Scotland
Scottish Islands Federation - Marine Litter Working Group

Other

Common Weal

DF Concerts & Events

CircularChem Centre

University of the West of Scotland

'One Bin to Rule Them All' Team, University of Manchester

Ostrero

Valpak

Sustainable Certifications Group

RWE Generation UK

The Association for Renewable Energy and Clean Technology

Scottish Power

SSEN Transmission

British Tyre Manufacturing Association

Insulation Manufacturers Association

Appendix C: Quantitative Summary

The following tables outline the results for each of the eight closed questions in the consultation.

For each question the following tables show:

- The number of respondents from the total sample of 156 who selected each response, and the corresponding percentage.
- The number and percentage response **among those who answered each question**, broken down by:
 - Individual and organisation responses.
 - By sector⁹.

Please note that the row percentages may not add to 100% due to rounding.

Summary of level of support for each set of actions

Actions	% of those answering who agree or strongly agree
Reduce and reuse: priority actions	77%
Reduce and reuse: further actions	71%
Modernise recycling: priority actions	76%
Modernise recycling: further actions	76%
Decarbonise disposal: priority actions	78%
Decarbonise disposal: further actions	78%
Strengthen the circular economy: priority actions	76%
Strengthen the circular economy: further actions	81%

⁹ The 'Other' category comprises 17 organisations involved in consulting, energy, manufacturing, academia/research and miscellaneous sectors, and 6 membership / representative bodies not aligned with a relevant sector.

Q1. To what extent do you agree with the priority actions proposed within the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	39	65	13	8	10	21
All respondents (%)	156	25	42	8	5	6	13
All answering (%)	135	29	48	10	6	7	-
Individuals (%)	42	45	29	5	5	17	-
Organisations (%)	93	22	57	12	6	3	-
- Retail & packaging	22	23	36	23	5	14	-
- Third sector	17	12	71	0	18	0	-
- Local Authority	15	33	47	13	7	0	-
- Public body	8	38	63	0	0	0	-
- Waste management	8	13	50	25	13	0	-
- Construction / Dev	7	14	86	0	0	0	-
- Other	16	19	69	13	0	0	-

Q2. To what extent do you agree with the further actions to 2030 listed across the Reduce and reuse strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	27	69	15	13	12	20
All respondents (%)	156	17	44	10	8	8	13
All answering (%)	136	20	51	11	10	9	-
Individuals (%)	42	40	29	5	7	19	-
Organisations (%)	94	11	61	14	11	4	-
- Retail & packaging	23	0	30	35	17	17	-
- Third sector	17	12	59	0	29	0	-
- Local Authority	15	27	60	13	0	0	-
- Public body	8	13	88	0	0	0	-
- Waste management	8	13	88	0	0	0	-
- Construction / Dev	7	0	71	29	0	0	-
- Other	16	13	75	6	6	0	-

Q3. To what extent do you agree with the priority actions proposed within the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	30	62	11	12	6	35
All respondents (%)	156	19	40	7	8	4	22
All answering (%)	121	25	51	9	10	5	-
Individuals (%)	42	38	29	10	12	12	-
Organisations (%)	79	18	63	9	9	1	-
- Retail & packaging	17	18	76	6	0	0	-
- Third sector	15	13	40	13	27	7	-
- Local Authority	15	7	80	13	0	0	-
- Public body	7	29	57	14	0	0	-
- Waste management	7	29	71	0	0	0	-
- Construction / Dev	4	0	50	0	50	0	-
- Other	14	29	57	7	7	0	-

Q4. To what extent do you agree with the further actions to 2030 listed across the Modernise Recycling strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	30	55	12	8	7	44
All respondents (%)	156	19	35	8	5	4	28
All answering (%)	112	27	49	11	7	6	-
Individuals (%)	41	41	24	10	10	15	-
Organisations (%)	71	18	63	11	6	1	-
- Retail & packaging	15	40	47	13	0	0	-
- Third sector	14	7	43	21	21	7	-
- Local Authority	15	7	80	13	0	0	-
- Public body	5	40	60	0	0	0	-
- Waste management	6	17	83	0	0	0	-
- Construction / Dev	3	0	100	0	0	0	-
- Other	13	15	69	8	8	0	-

Q5. To what extent do you agree with the priority actions proposed within the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	36	51	7	6	11	45
All respondents (%)	156	23	33	4	4	7	29
All answering (%)	111	32	46	6	5	10	-
Individuals (%)	41	49	17	2	15	17	-
Organisations (%)	70	23	63	9	0	6	-
- Retail & packaging	12	42	58	0	0	0	-
- Third sector	15	20	33	20	0	27	-
- Local Authority	15	13	80	7	0	0	-
- Public body	5	20	80	0	0	0	-
- Waste management	6	33	50	17	0	0	-
- Construction / Dev	5	20	80	0	0	0	-
- Other	12	17	75	8	0	0	-

Q6. To what extent do you agree with the further actions to 2030 listed across the Decarbonise disposal strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	29	54	11	6	7	49
All respondents (%)	156	19	35	7	4	4	31
All answering (%)	107	27	50	10	6	7	-
Individuals (%)	40	40	25	10	10	15	-
Organisations (%)	67	19	66	10	3	1	-
- Retail & packaging	12	42	58	0	0	0	-
- Third sector	14	21	50	21	0	7	-
- Local Authority	15	7	60	20	13	0	-
- Public body	4	25	75	0	0	0	-
- Waste management	6	17	83	0	0	0	-
- Construction / Dev	4	25	50	25	0	0	-
- Other	12	8	92	0	0	0	-

Q7. To what extent do you agree with the priority actions proposed within the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	47	46	11	9	9	34
All respondents (%)	156	30	29	7	6	6	22
All answering (%)	122	39	38	9	7	7	-
Individuals (%)	41	51	15	2	15	17	-
Organisations (%)	81	32	49	12	4	2	-
- Retail & packaging	15	53	33	13	0	0	-
- Third sector	16	38	25	6	19	13	-
- Local Authority	14	21	71	7	0	0	-
- Public body	8	50	38	13	0	0	-
- Waste management	7	14	71	14	0	0	-
- Construction / Dev	6	17	67	17	0	0	-
- Other	15	20	60	20	0	0	-

Q8. To what extent do you agree with the further actions to 2030 listed across the Strengthen the circular economy strategic aim? Please provide evidence to support your answer if possible.

Base	n=	Strongly Agree	Agree	Neither	Disagree	Strongly disagree	No answer
All respondents (n=)	156	44	53	6	10	7	36
All respondents (%)	156	28	34	4	6	4	23
All answering (%)	120	37	44	5	8	6	-
Individuals (%)	41	49	17	2	20	12	-
Organisations (%)	79	30	58	6	3	3	-
- Retail & packaging	14	57	29	14	0	0	-
- Third sector	15	27	47	0	13	13	-
- Local Authority	15	13	87	0	0	0	-
- Public body	6	50	50	0	0	0	-
- Waste management	8	25	75	0	0	0	-
- Construction / Dev	6	33	67	0	0	0	-
- Other	15	20	60	20	0	0	-



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Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

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