

# **Delivering Scotland's circular economy – A Route Map to 2025 and beyond**

## **Island Communities Screening Assessment**

**May 2022**



**Scottish Government**  
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## ***Policy Aim***

The Scottish Programme for Government 2020-21 and the Climate Change Plan update 2020 committed to:

- Develop a Route Map to reduce waste and meet waste and recycling targets for 2025; and
- Work with partners to identify how the waste and resources sector will contribute towards Scotland's journey towards net zero in the period to 2030 and beyond.

The waste and recycling targets are:

- 15% reduction of all waste, against a 2011 baseline, by 2025
- 33% reduction of food waste, against a 2013 baseline, by 2025
- Minimum of 60% recycling of all household waste by 2020
- Minimum of 70% recycling of all waste by 2025
- Maximum 5% of all waste to landfill and the ban on landfilling biodegradable municipal waste by 2025.

These targets together with our ambitious net zero target form the key drivers for the Route Map.

The Route Map will also support progress towards the national outcomes for the economy (we have a globally competitive, entrepreneurial, inclusive and sustainable economy) and environment (we value, enjoy, protect and enhance our environment).

The Route Map will be a strategic plan we develop to deliver our waste and recycling targets to 2025, and beyond to deliver Scotland's circular economy and help meet our commitment to net zero. It will build on the progress already made and set out the steps that can be taken to drive further change.

### **Packages of measures within the Route Map**

The Route Map consultation proposes a range of additional legislative and non-legislative measures that can positively contribute to the delivery of the targets and make progress towards carbon reduction. Proposals have been grouped into six packages, which span action across the whole circular economy, plus an additional seventh package of cross cutting measures.

The proposals draw upon a wide range of evidence (see Technical Annex of the consultation), and on build a shared understanding of the challenges, opportunities and potential measures with a range of cross-sector stakeholders.

It is recognised that achieving our waste and recycling targets and wider emissions reduction is a shared endeavour. Collaboration and partnership have been critical to our progress so far, and we can only be successful if everyone plays their part – government, households and businesses.

The specific policy detail for each measure will not be fully defined at this stage. It is intended that the Route Map will enable the Scottish Government to articulate a

strategic approach to consolidate action, refocus efforts and ensure greater policy coordination that will help contribute towards existing targets and ambitions.

The packages of measures contained within the Route Map are:

<b>Promote responsible production, consumption and reuse</b>	Challenging and disrupting current approach to production and consumption by improving design, mainstreaming reuse and repair and incentivising sustainable choices.
<b>Reduce food waste</b>	Reducing food waste from all sources.
<b>Improve recycling from households</b>	Improving and optimising the performance of household recycling collection services to make the right choices easier for households.
<b>Improve recycling from commercial businesses</b>	Businesses having the information and support they need to reduce waste and maximise recycling.
<b>Embed circular construction practices</b>	Embedding circular construction practices to reduce resource needs, reduce waste and carbon and encourage refurbishment and reuse.
<b>Minimise the impact of disposal</b>	Achieving the best environmental outcomes for materials that can't be captured for reuse or recycling, and ensure environmental and economic value of wasted resources and energy is harnessed efficiently.

The additional package of cross-cutting measures will ensure the right structures and support are in place to enable action across the circular economy, including strategic measures and governance, research, data and evidence, sustainable procurement, and skills and training.

## **The Islands (Scotland) Act 2018**

The Islands (Scotland) Act 2018 provides for a duty on Scottish Ministers and other relevant public bodies that they must have regard to island communities in exercising their functions and in the development of legislation.

Section 13 of the 2018 Act obliges the Scottish Ministers to prepare an Islands Communities Impact Assessment (ICIA) in relation to legislation which, in their opinion, is likely to influence an island community that is significantly different from its effect on other communities in Scotland.

Section 13 of the 2018 Act states that an ICIA must:

- a) Describe the likely significant different effect of the legislation.
- b) Assess the extent to which the Scottish Ministers consider that the legislation can be developed in such a manner as to improve or mitigate, for island communities, the outcomes resulting from the legislation; and

- c) Set out the financial implications of steps taken under this subsection to mitigate, for island communities, the outcomes resulting from the legislation.

The Scottish Government's island communities impact assessments guidance sets out four preliminary stages that must be undertaken prior to preparing an ICIA. These are:

1. Developing a clear understanding of the objectives and intended outcomes of the policy, strategy or service including any island needs or impacts.
2. Gathering data, identifying evidence gaps and identifying stakeholders.
3. Consulting with appropriate stakeholders.
4. Assessing whether there are any issues resulting from the proposed policy that are significantly different from those that would be experienced on the mainland, or on other islands.

If any significantly different impacts are identified, an ICIA will be required.

## **Framing**

This screening assessment seeks to complete the first two stages of the ICIA process by identifying whether there are issues which merit further exploration through research and engagement with island representatives.

The aim of the Route Map is to achieve its ambitions throughout Scotland, including within island communities. There is an awareness that there may be specific challenges for these communities, which this impact assessment begins to explore.

The Route Map is focused on identifying packages of measures and the specific policy detail for each of these will not be fully defined at this stage. It is intended that the Route Map will enable the Scottish Government to articulate a strategic approach which will contribute towards existing targets and ambitions.

The publication of the Route Map in itself will not directly impact island communities. However, there is potential, once the measures are implemented that they may have impacts. This Island Communities Screening Assessment is therefore an overview identifying broad likely impacts and will be updated following the public consultation. Further, more detailed Island Community Impact Assessments will be carried out where appropriate when individual measures are designed and developed fully.

Alongside consultation on the Route Map proposals to accelerate progress and deliver our targets, we are also consulting on a Circular Economy Bill to bring forward primary legislation to underpin our key policy measures. An Islands Communities Screening Assessment has also been completed for Bill proposals.

## **Methodology**

An initial screening was carried out with Scottish Government and Zero Waste Scotland colleagues to identify an initial list of possible impacts which may apply to the packages of measures when they are implemented in future.

To focus discussion and help align potential impacts with future measures the workshop therefore considered each package individually.

Following the workshop, desktop research has been carried out to further investigate and gather existing evidence in relation to the proposals.

The findings of the workshop and desktop research will inform the approach to engagement with island communities during the public consultation.

It is important to stress that the Route Map is identifying an overview of measures based on existing policies. Subsequent stages to develop these measures individually will be required to clarify the relevant policy detail to implement the commitments outlined.

This islands communities screening assessment, therefore, does not contain a detailed analysis of the possible impacts of each measure on island communities. However, where appropriate, subsequent development of measures will be subject to further impact assessments and associated consultations.

This screening assessment identifies some priorities for further analysis as well as areas where further evidence-gathering is required as the detailed design of each relevant measure being developed. Detailed ICIA's will also provide opportunities for island communities, agencies, and businesses to highlight concerns and to help maximise the benefits from future policies.

## **Key findings**

Following the initial workshop and the desktop research several key issues have been identified as having a potential direct or indirect impact for island communities when measures are developed. These are:

- transport
- availability of disposal options
- availability of products and services
- employment and skills.

The section below highlights how these may be relevant for each of the packages of measures.

### **Promote responsible production, consumption and reuse**

Opportunities for increasing reuse in islands as a solution to reducing consumption of goods and packaging may be different for island communities. They could be more limited due to distance making collection inefficient or more expensive; infrastructure requirements for smaller quantities of arisings; or a reduced market for reusable items. Equally, if measures result in a reduction of waste being produced or if producers on islands that sell easily to the local community, then there are potentially more significant benefits on islands due to reduced waste and recycling costs or more effective localised business operations.

It is understood that Island Communities already experience a relative lack of choice in terms of access to goods and services when compared to other communities<sup>1</sup>.

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<sup>1</sup> [Developing Scotland's Circular economy – proposals for legislation: analysis of responses](#) (2020)

This is a result of a smaller number of shops in the local area, and the higher cost of deliveries to more remote parts of Scotland<sup>2</sup>. This may be relevant here and should be considered where appropriate when measures under this package are taken forward. This is particularly important where specific products have a direct charge attached to them, but alternatives may not be available.

Measures that create employment and develop skills in the repair or refurbishment of products could bring additional benefit to island communities where availability of jobs is variable<sup>3</sup>. However, in the development of these measures consideration should be given to whether opportunities may be reduced compared with other communities given the likely scale of potential operations.

### **Reduce food waste**

There is potential for redistribution of food to be more challenging in an island setting, though measures could also bring specific benefits. The Scottish Government's six-fold urban rural classification (2016) classifies the islands as mainly remote rural, with remote small towns (see Figure 1).<sup>4</sup> Those living in isolated rural areas have been found to be more vulnerable to food poverty,<sup>5</sup> and the cost of living is generally higher in island communities.<sup>6</sup>

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<sup>2</sup> [Fairer Deliveries for All: an action plan, Scottish Government, 2018](#)

<sup>3</sup> [National Islands Plan Survey: final report - gov.scot \(www.gov.scot\)](#)

<sup>4</sup> [Scottish Government urban rural classification 2016](#)

<sup>5</sup> [The nature and extent of food poverty/insecurity in Scotland](#)

<sup>6</sup> [A minimum income standard for remote and rural Scotland](#)

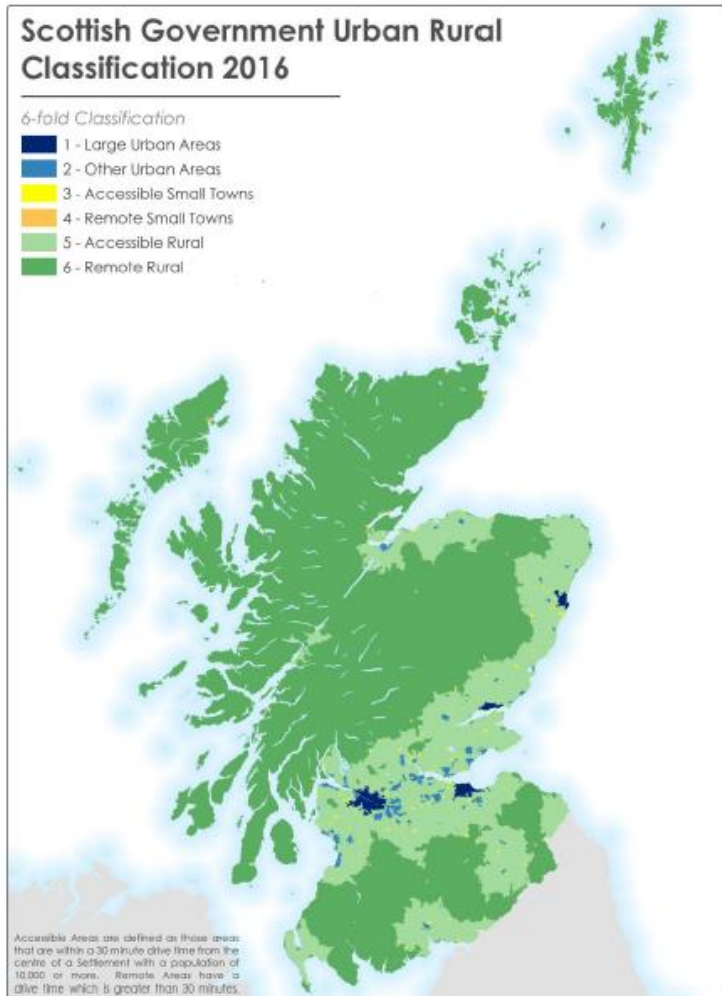


Figure 1 The Scottish Government six-fold urban rural classification, 2016. Source: Scottish Government urban rural classification 2016

Previous research has identified that remoteness can be a challenge both for businesses with surplus food to redistribute, and for community organisations trying to access surplus food, due to the distances involved.<sup>7</sup> Despite this, there are currently a range of redistribution mechanisms in place in island communities. These range from involvement with large-scale organisations such as FareShare, who distribute food to charitable organisations, including some in the islands, to locally focused community initiatives such as community fridges and food share schemes.

For island businesses with surplus food, the key issue will be whether there are organisations that could use the food in the local area. This may be a challenge in smaller island communities.

Any mandatory reporting requirements placed on businesses would apply to all businesses across Scotland, and so would not be an island-specific issue. However, island businesses may need to make more changes to their operations than those elsewhere in order to report on food waste, because they are currently exempt from segregated food waste collections under the rural exemption.<sup>8</sup> Businesses would therefore need to implement a system for measuring their food waste, for example

<sup>7</sup> Unpublished Zero Waste Scotland research

<sup>8</sup> [The Waste \(Scotland\) Regulations 2012](#)

via representative sampling. However, this will apply to businesses in other parts of the country covered by the rural exemption, so is not unique to an island setting.

In addition, any extra time or cost burden would simply be aligning the islands with what businesses, from micro to large, that are not exempt from food waste separation requirements are already obliged to do.

### **Improve recycling from households**

Work undertaken for previous screening assessments under the Islands (Scotland) Act has identified that Island authorities often face higher costs per capita in collecting, transporting and disposing of waste and recycling<sup>9</sup>. This is, in part, due to rural nature of collections meaning they are less efficient: the Scottish Government Urban / Rural Classification<sup>10</sup> highlights that the majority of the island authorities have high proportions of their populations in very remote small towns and rural areas. Some islands do not have kerbside recycling services at present for this reason. Additional costs are incurred as waste and recycling must often be transported off island for processing due to the limited number of operational landfill sites and other disposal facilities located on islands.

People living in island communities may face additional barriers to responsibly recycling or disposing of recycling their waste due to the lack of facilities – this includes waste from a number of sources, including households, commercial properties and construction and demolition sites. Smaller local authorities, with less waste to market, may have greater difficulty negotiating with the private sector to invest in and establish new facilities, there is also a reduced ability to work with neighbouring authorities to share costs of these developments through waste partnerships. Waste partnerships have been successfully developed by some smaller authorities particularly for treatment and disposal in mainland Scotland and in the rest of the UK.

When developing measures that seek to drive improvements in household recycling it will be essential that the design processes account for the specific needs of island communities. This should include the differing impacts for different islands<sup>11</sup>, how changes in waste produced may be impacted by transportation issues such as cost but also disruption of ferry services, for example due to high numbers of tourists or poor weather.

### **Improve recycling from commercial businesses**

It is a common theme of Island Community Impact Assessments that there are unique challenges for island communities regarding the availability and affordability of transport. The higher costs of transportation may make it harder for island businesses to collect and distribute recycling. The higher costs of transportation may make it harder for island businesses to collect and distribute recycling, while opportunities to increase the market for recycled material may be more limited due to the costs of transportation, and more limited local infrastructure.

Consideration should be given to the challenges island businesses face during the development of measures that will impact them.

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<sup>9</sup> Reforming the UK packaging producer responsibility system, [Partial island communities screening assessment](#), March 2021

<sup>10</sup> [Scottish Government Urban Rural Classification 2016](#)

<sup>11</sup> [The National Islands Plan survey](#)



### **Embed circular construction practices**

As highlighted above, consideration should be given to the availability and affordability of transport which may lead to higher costs of construction on islands.

In addition, island communities may have potential issues with regards to supply chain and skills, with more limited access to sustainable construction products and services, reduced ability to follow demolition, screen, reprocessing and reuse of the resulting materials, and more limited availability and supply of workers. This was highlighted specifically in Heat in Buildings Strategy ICIA<sup>12</sup>, but may impact other supply chains and skills in the construction sector. However, measures that create and develop skills in the circular construction practices could also bring additional benefit to island communities.

### **Minimise the impact of disposal**

Impacts associated with costs of disposal are likely to vary between islands. Some islands have local access to a landfill or other residual waste treatment facility, all other waste must often be transported off island, often by ferry, for processing. This limits the facilities that are available to island communities as is shown by SEPA's Landfill Sector Plan<sup>13</sup> which identifies the locations of operational landfill sites in Scotland (see Figure 2 below).

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<sup>12</sup> [Heat in Buildings Strategy: Island Communities Impact Assessment](#)

<sup>13</sup> [Landfill Sector Plan](#)

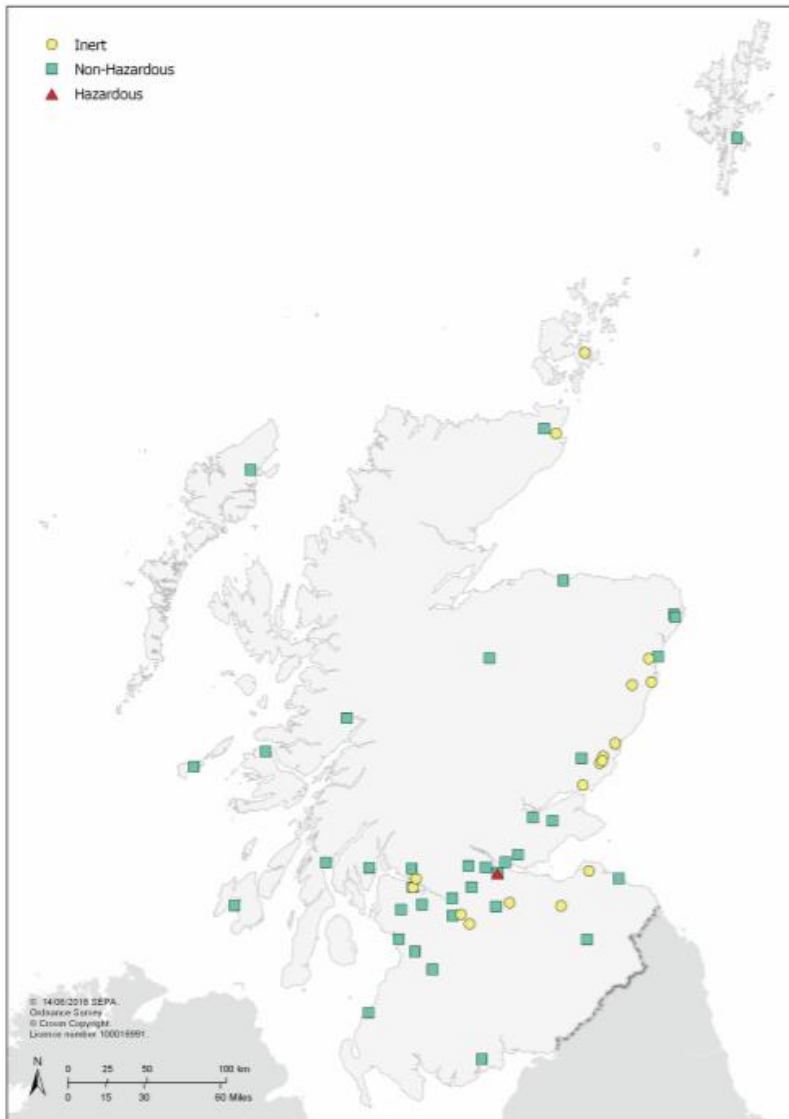


Figure 2: Operational landfill sites in Scotland

Increased recycling rates or changes to segregation of waste may result in a large amount of space required on ferries. This impacts the costs associated with transport, particularly when multiple ferry journeys are required before waste arrives at its destination.

More limited options for disposal routes on islands has previously resulted in taking approaches that limit additional costs, for example creation of energy from waste facilities on Shetland.

Implementing measures further up the waste hierarchy to divert waste away from landfill may also be problematic due to increased transport costs and, for some materials, there are limited times that they are allowed on the ferries due to odour (or perceived odour) from the material. This can be particularly challenging for difficult to recycle materials such as WEEE collections, end-of life vehicles and construction materials. Recycling of farm plastics, for example, has two voluntary collection schemes and several waste collectors that will collect this material for processing; however, the large transportation cost make this very expensive and prohibitive in most cases.

## **Gathering data**

Some data exists for each of the key issues identified during the workshop. These are outlined below. However, at this stage only overarching issues have been identified to begin the evidence gathering process. It is intended that further detailed assessment of the impacts and associated evidence is gathered at the point where the details of measures are developed. At this stage, further research should be considered to understand the gaps in data that exist.

### **i) Transport**

The Scottish National Islands Plan Survey highlights that views on the reliability and availability of ferries varies between ages groups and between island subregions<sup>11</sup>.

### **ii) Availability of disposal options**

Waste and recycling data is available from island communities via their local authorities and is reported to SEPA on an annual basis using Waste Data Flow<sup>14</sup>. This data covers household waste and recycling collections, treatment and disposal. This data shows that the majority of island authorities have recycling rates that are below the Scottish average, in some cases by a substantial margin<sup>15</sup> and kerbside recycling services are not universal in island communities.

There is, however, less data available on commercial and industrial waste. Data is key to understanding waste, recycling and resource flows and to target necessary action and funding.

Shetland, Comhairle nan Eilean Siar and Orkney local authorities are able to provide specific waste management data relating to their island communities and this should be used when it comes to the design of specific measures. Highlands, Argyll & Bute and North Ayrshire local authorities may be less likely to be able to disaggregate data from island communities. This might also be the case for waste management companies, where they operate on islands. Efforts should be made to collect data specific to these island communities to better inform the detailed development of relevant measures.

The Scottish National Islands Plan Survey highlights the variability of views between subregions on access to recycling household waste and donating items for reuse<sup>11</sup>. This should be considered and explored further during the development of related measures.

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<sup>14</sup> <https://www.sepa.org.uk/environment/waste/waste-data/>

<sup>15</sup> [Scottish Household waste – summary data 2019](#)

**Question/variable: (about your local area (within 3-4 miles of your home):) There is a local facility where I can donate things I no longer use**  
**Comparison: All responses, and responses within subregions - Figures are weighted by age, gender and subregion.**

Scale of bars = 100% of responses. Number of group responses shown beneath bars

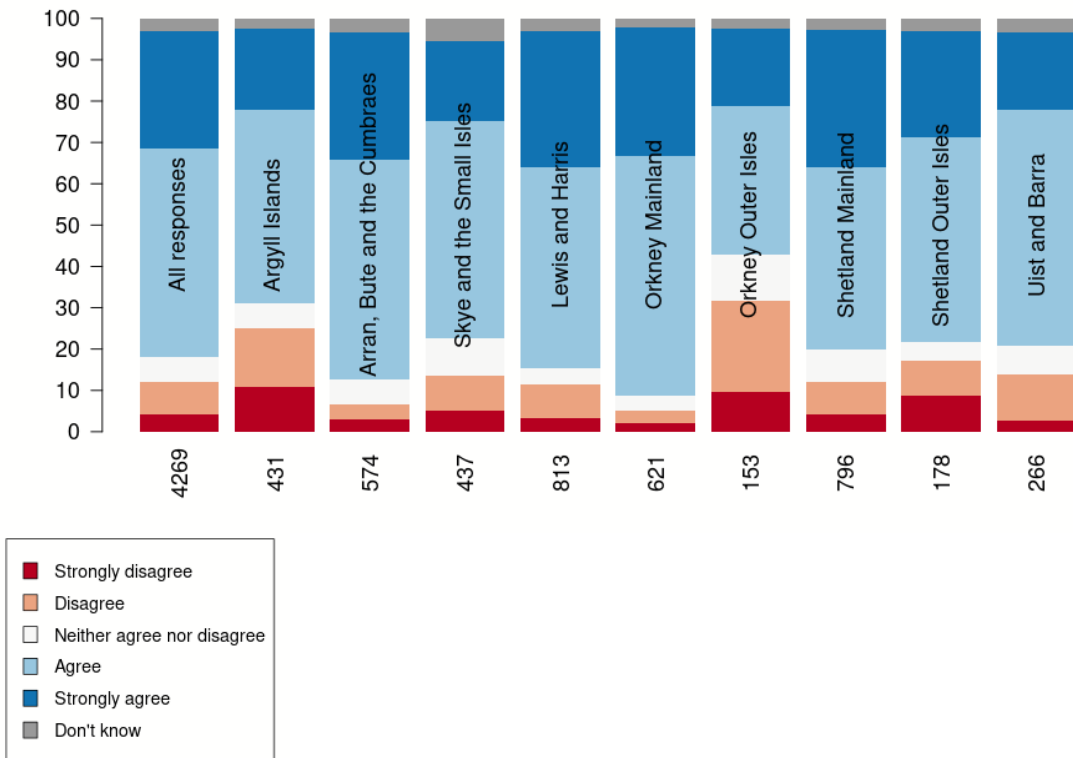


Figure 3 Scottish National Islands Plan Survey (2020)

Research undertaken previously by Zero Waste Scotland<sup>16</sup> to better understand the costs of waste management, collection and disposal in Scotland, all of the island authorities, with the exception of North Ayrshire, were included in the rural inaccessible category. North Ayrshire was included in the rural accessible classification because most of the population lives on the mainland, with the exception of Arran. The research indicated that for the rural inaccessible category, the annual cost per household of providing waste collections is substantially higher than the average cost in Scotland. Although these figures should be treated with caution as they are based on one year's data and calculating using a number of assumptions, they do indicate that there is an island premium in the cost to local authorities of managing household waste.

### iii) Availability of products and services

It is understood through research gathered for the Fairer parcel deliveries: action plan<sup>17</sup> that some costs for delivery can be unfair for those living in rural and remote areas, such as the islands. This can prevent island communities taking advantage of the digital economy and the products and services it provides. It is also noted that this can be a barrier to small businesses, which further limits the availability for individuals as well as the economic potential of those locations.

<sup>16</sup> Zero Waste Scotland, desk-based research

<sup>17</sup> [Fairer parcel deliveries: action plan](#)

The Islands Green Recovery Programme Refill Fund was part of the Scottish Government's £2 million programme to inspire locally-led green projects on islands to recover from the coronavirus pandemic. The fund awarded over £250,000 to 20 organisations and businesses in island communities to gain funding to develop packaging-free shopping opportunities in the grocery retail sector.

**iv) Employment and skills**

The National Islands Plan survey<sup>3</sup> provides an understanding of availability of job and training opportunities across the different island sub-regions. Further knowledge would be needed to understand how this would relate to any opportunities and challenges resulting from measures that affect employment and skills, and how these would differ from those experienced by communities elsewhere in Scotland.

**Recommendation and conclusions**

Given the publication of the Route Map itself will not result in impacts on island communities, this Island Communities Screening Assessment is an overview identifying broad likely impacts that should be considered in more detail, where appropriate, as measures are subsequently developed.

This ICIA has identified four key ways in which island communities may be impacted differently to other parts of Scotland as a result of implementing proposed measures. These are:

- i) Transport
- ii) Availability of disposal options
- iii) Availability of products and services
- iv) Employment and skills.

We will seek the views of island communities during the consultation, to ensure that we have captured potential overarching impacts which may apply to measures as far as possible at this stage. This assessment will be updated following the public consultation but will remain a high-level assessment.

Further, more detailed Island Community Impact Assessments will be carried out where appropriate when individual measures are designed and developed fully.

**A full Islands Community Impact Assessment is NOT required**

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The Scottish Government  
St Andrew's House  
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EH1 3DG

Published by The Scottish Government, May 2022

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA  
PPDAS1088922 (05/22)

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