

**From:** [REDACTED]  
**Sent:** 06 May 2022 15:29  
**To:** [REDACTED]  
**Subject:** RE: WTE Moratorium - case 202200298701

Hi again,

I will ask [REDACTED] to send an invite to [REDACTED] then. Thank you.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 May 2022 13:53  
**To:** [REDACTED]  
**Subject:** RE: WTE Moratorium - case 202200298701

[REDACTED]

You'd agreed to take the amazon one previously I'm afraid

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 May 2022 13:36  
**To:** [REDACTED]  
**Subject:** RE: WTE Moratorium - case 202200298701

[REDACTED]

I understand that [REDACTED] are dealing with BHF, I'm doing the [REDACTED] and I don't know about the Amazon one.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 06 May 2022 13:35  
**To:** [REDACTED]  
**Subject:** RE: WTE Moratorium - case 202200298701

Thank you [REDACTED]

I've sent the case to her.

I would like to confirm with you and [REDACTED] that these three diary cases that I have received an invite to (during my absence), are in your calendars/radar too?

[REDACTED]

8<sup>th</sup> June, 9:00, Meeting with Jonathon McCreddie - Amazon (case 202200289506)

Many thanks,

**[REDACTED]**

**From:** [REDACTED]  
**Sent:** 06 June 2022 11:41  
**To:** 'McCreadie, Jonathon' [REDACTED]  
**Subject:** RE: Meeting with Ms Slater on Wednesday 8th June

Good morning, Jonathan

I can confirm that the officials attending the meeting will be [REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 16:59  
**To:** 'McCreadie, Jonathon' [REDACTED]  
**Subject:** RE: Meeting with Ms Slater on Wednesday 8th June

Thank you, Jonathon

I can confirm that the meeting has a 30 minute slot.

I will be attending with the minister, in my capacity as Bill Manager, and there may also be a colleague from the DRS side. I will confirm that at the beginning of next week.

[REDACTED]

**From:** McCreadie, Jonathon [REDACTED]  
**Sent:** 31 May 2022 12:10  
**To:** [REDACTED]  
**Subject:** RE: Meeting with Ms Slater on Wednesday 8th June

Good afternoon [REDACTED]

I will be in attendance as Public Policy Lead for Amazon in Scotland. My colleague [REDACTED] will also attend as Senior Public Policy Manager for Sustainability UK.

We would like to discuss the following:

1. Deposit Return Scheme
2. Circular Economy Bill
3. An Amazon hyperlocal donations initiative

Would you please confirm that the meeting next Wednesday is for 30 minutes and also the names and roles of those attending from Scottish Government?

Thanks,

Jonathon

**From:** [REDACTED]

**Sent:** 31 May 2022 11:50

**To:** [REDACTED]

**Subject:** Meeting with Ms Slater on Wednesday 8th June

Good morning, Jonathon

An you please confirm the attendees and agenda for your meeting with Ms Slater next week. Grateful for a response this afternoon, please.

Many thanks

[REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 16:34  
**To:** [REDACTED]  
**Subject:** RE: Amazon and DRS - urgent briefing request

Thanks, Brill

[REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 16:33  
**To:** [REDACTED]  
**Subject:** RE: Amazon and DRS - urgent briefing request

They're not a member of CSL at any rate, and I've been unable to find any statements other than guidance for their selling partners: [Scotland Deposit Return Scheme – Amazon Seller Central](#)

[REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 16:29  
**To:** [REDACTED]  
**Subject:** RE: Amazon and DRS - urgent briefing request

Thanks, [REDACTED] – is there anything specific to Amazon? Are they involved in CSL, for instance, have they made any statements about DRS?

[REDACTED]

**From:** [REDACTED]  
**Sent:** 31 May 2022 16:28  
**To:** [REDACTED]  
**Subject:** RE: Amazon and DRS - urgent briefing request

Hi [REDACTED]

Here's the DRS contribution:

## **DEPOSIT RETURN SCHEME**

### **Top Lines**

- We are implementing an ambitious, all-in Deposit Return Scheme, which will be the first in the UK, from 16 August 2023.
- I am delighted that the Scottish National Investment Bank and Bank of Scotland have announced a total of £18m loan funding for Circularity Scotland.
- This is a tremendous vote of confidence in our Deposit Return Scheme (DRS) and in them as scheme administrator.
- Recently Circularity Scotland has also published details of the handling fee that will be paid to retailers operating a return point, and the specification for reverse vending machines.

- Confirming these details is a major step forward and will allow industry to move forward in its preparations to deliver the scheme.
- I am pleased to see momentum building behind Circularity Scotland as they prepare to deliver our DRS from 16 August 2023.
- Our DRS will be one of the most environmentally ambitious and accessible in Europe.

#### **Alignment with rUK DRS**

- We are continuing to work with the other administrations in the UK to ensure interoperability of our schemes. However, any interaction on this would have to be on the basis of protecting the ambition level of our scheme.

#### **Cost of DRS and consumer choice**

- DRS is an example of producer responsibility and, rightly, places the cost burden on producers to deal with the bottles and cans they place on the market at end-of-life. Product pricing decisions are a matter for industry.

#### **Labelling**

- The DRS Regulations do not mandate adopting any label but leave this decision to industry.
- I know that Circularity Scotland is working with members to determine an approach to labelling and I would encourage you to participate in those discussions.

#### **Online / Distance Takeback**

- It is vital to the success and fairness of our DRS that online retailers provide a takeback service to ensure that those who rely on online deliveries because of age, location, or disability can redeem the deposit.
- The Regulations provide flexibility over how the distance takeback service is to be delivered. For example, they allow retailers to work together to set up a system-wide solution to reduce the burden and increase efficiency.
- We are working with SEPA to provide advice and guidance to industry on putting in place such a solution. This included a workshop that my officials hosted with SEPA and retailers in February.

[REDACTED]

[REDACTED]

**From:** [REDACTED]

**Sent:** 31 May 2022 15:43

**To:** [REDACTED]

**Subject:** FW: Amazon and DRS - urgent briefing request

Thanks for dealing [REDACTED]

[REDACTED]

**From:** [REDACTED]

**Sent:** 31 May 2022 12:21

**To:** [REDACTED]

**Subject:** RE: Amazon and DRS - urgent briefing request

Also, [REDACTED], might be worth either you or [REDACTED] attending in support along with me.

[REDACTED]

**From:** [REDACTED]

**Sent:** 31 May 2022 12:16

**To:** [REDACTED]

**Subject:** Amazon and DRS - urgent briefing request

[REDACTED]

Just had confirmation from Amazon that the agenda for their meeting next Wednesday with LS is as follows.

1. Deposit Return Scheme
2. Circular Economy Bill
3. An Amazon hyperlocal donations initiative

Briefing is due up tomorrow but, at 8:04 tomorrow, I'll be on a train to Leeds (opening night of Parsifal, since you ask), so I need to get it up today.

Can you give me lines etc on Amazon's views on / issues with DRS please, as soon as ...

Many thanks

[REDACTED]

**From:** [REDACTED]  
**Sent:** 29 July 2022 16:19  
**To:** [REDACTED]  
**Cc:** McCreadie, Jonathon [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Thanks [REDACTED]

A Teams call next week would be great, please do send an invite – hopefully one of the times works below. I would think 30mins.

Tuesday 10.30am-1.00pm  
Wednesday 9.00am-10.30am or 11.00am  
Friday 2.00pm-4.30pm

Have a good weekend  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 29 July 2022 15:54  
**To:** [REDACTED]  
**Cc:** 'McCreadie, Jonathon' [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi [REDACTED]

Sorry I missed your earlier email. Happy to try to answer any questions you may have on the consultation, by email, Teams call or whatever.

I'm not sure I have seen the inception meeting report yet.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 29 July 2022 15:49  
**To:** [REDACTED]  
**Cc:** McCreadie, Jonathon [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi [REDACTED],

Just following up on the question re. points of clarification on the CE bill – are you best placed to respond to these?

If a call is possible that would be helpful.

Thanks,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 15:52  
**To:** [REDACTED]  
**Cc:** McCreadie, Jonathon [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi [REDACTED]

Many thanks for your email, and look forward to receiving a response from the policy teams.

In you role as CE bill manager, would you be best placed to respond to some questions we had on the consultation? They are points of clarification.

Kind regards,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 14:52  
**To:** McCreadie, Jonathon[REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi Jonathon and [REDACTED]

I am well and hope you are too.

I had passed your query to the policy team leading on these meetings, and have reminded them that the response to you is outstanding. It is, however, the holiday season, so apologies that you have not received a response yet.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 14:45  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

[REDACTED]

Agreed – I double checked and it is on the system for John

[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 14:34  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

[REDACTED]

I checked (on Teams) with [REDACTED] as there hadn't been a response. This is the reply –

[REDACTED]

I think there's a MiCase. We've been hammered by the IMA stuff at the moment so no one's had a chance to really look at it.

I suggest responding to [REDACTED] that we have passed the query to the relevant policy team. If the team has not had time to look at the MiCase, they are not going to have time to look out an answer to the query for me to draft a reply.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 11:34  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

From memory I think [REDACTED] had received it separately and was dealing with it as a micase?

[REDACTED]

**From:** [REDACTED]  
**Sent:** 26 July 2022 11:23  
**To:** [REDACTED]  
**Subject:** FW: Meeting With Amazon Follow Up

Clearly, I didn't deal with this before I went off on leave, and now I have forgotten what we were going to do with it. Can you remember?

[REDACTED]

**From:** McCreddie, Jonathon [REDACTED]  
**Sent:** 26 July 2022 11:20  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi [REDACTED]

I hope you're well.

I just wondered if you had an update on the below please?

Best wishes,

Jonathon

**From:** [REDACTED]  
**Sent:** 30 June 2022 16:07  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

It's already on MiCase and assigned to me.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 30 June 2022 16:06  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Happy for [REDACTED] to just respond to Amazon but as they've written to the Minister does this not need to be a MiCase if not already?

[REDACTED]

**From:** [REDACTED]  
**Sent:** 30 June 2022 16:00  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

As we didn't discuss at Unit meeting, any thoughts?

[REDACTED]

**From:** [REDACTED]  
**Sent:** 30 June 2022 07:13  
**To:** [REDACTED]  
**Subject:** FW: Meeting With Amazon Follow Up

For info. Discuss at Unit meeting?

[REDACTED]

**From:** [REDACTED]  
**Sent:** 29 June 2022 17:34  
**To:** [REDACTED]  
**Cc:** McCreadie, Jonathon <[REDACTED]>  
**Subject:** FW: Meeting With Amazon Follow Up

Hi [REDACTED]

Following-up from Jonathan's last email, it would be great to know if the Minister is able to provide any updates following her meetings with SEPA and CSL, particularly on - waste carrier fees for individual delivery drivers, parity of producer liability for physical and online retailers, and when we might expect confirmation of the Return Handling Fees for Online Takeback.

We would be happy to speak to you again if that is helpful.

Thanks in advance,  
[REDACTED]

**From:** [REDACTED]  
**Sent:** 22 June 2022 12:08  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi

Thanks I will forward this on now.

[REDACTED]



**From:** [REDACTED]  
**Sent:** 22 June 2022 11:15  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

Hi – it should go to the DRS / EPR team, which would be [REDACTED]

[REDACTED]

**From:** [REDACTED]  
**Sent:** 22 June 2022 11:13  
**To:** [REDACTED]  
**Subject:** FW: Meeting With Amazon Follow Up

Good morning [REDACTED]

The following MiCase has been allocated to my team following a meeting with Ms Slater on 8 June. PO advised that you were the lead officials for this meeting. Will I send the case over to your team?

Thanks

[REDACTED]



**From:** [REDACTED]  
**Sent:** 21 June 2022 12:15  
**To:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

We're going to have an internal online takeback workshop in the next week or so which should be able to provide some additional info I could feed into a response. If not, I have some lines that could work in the meantime.

[REDACTED]

**From:** [REDACTED]

> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

**Sent:** 21 June 2022 12:04

**To:** Public Engagement Unit <[CorrespondenceUnit@gov.scot](mailto:CorrespondenceUnit@gov.scot)>

**Subject:** FW: Meeting With Amazon Follow Up

Hi for MiCase as MR please for DRS/EPR team.

Many thanks

[REDACTED] to Lorna Slater MSP, Minister for Green Skills, Circular Economy and Biodiversity

Scottish Government | St Andrew's House, Regent Road, Edinburgh EH1 3DG | Email:

[MinisterGSCEB@gov.scot](mailto:MinisterGSCEB@gov.scot)

All e-mails and attachments sent by a Ministerial Private Office to any other official on behalf of a Minister relating to a decision, request or comment made by a Minister, or a note of a Ministerial meeting, must be filed appropriately by the recipient. Private Offices do not keep official records of such e-mails or attachments.

Scottish Ministers, Special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

**From:** [REDACTED] **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

**Sent:** 21 June 2022 12:03

**To:** [REDACTED]

**Cc:** Minister for Green Skills, Circular Economy and Biodiversity <[MinisterGSCEB@gov.scot](mailto:MinisterGSCEB@gov.scot)>

**Subject:** RE: Meeting With Amazon Follow Up

Thank you!

**From:** [REDACTED]

**Sent:** 21 June 2022 12:00

**To:** Minister for Green Skills, Circular Economy and Biodiversity <[MinisterGSCEB@gov.scot](mailto:MinisterGSCEB@gov.scot)>

**Subject:** RE: Meeting With Amazon Follow Up

Hi [REDACTED]

We have discussed in the team – put it on the system, but we reckon it should fall to the DRS / EPR team.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 21 June 2022 11:57  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Meeting With Amazon Follow Up

[REDACTED]

Suggest it's dealt with on system but don't think it needs to be a ministerial response. Adding [REDACTED] absence as feels more of a DRS lead (I'm not clear whether the waste licenses issue is linked to DRS or a wider point?)

On the sustainability showcase would simply need to say let us have details nearer the time subject to diary availability.

[REDACTED]

**From:** [REDACTED]  
**Sent:** 21 June 2022 10:57  
**To:** [REDACTED]  
**Subject:** FW: Meeting With Amazon Follow Up

Both – please see the email which raises some issues. One is DRS, but the others would lie on the zero waste side of the fence. Do we deal with it on the system or off?

[REDACTED]

**From:** [REDACTED] **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity  
**Sent:** 21 June 2022 10:42  
**To:** [REDACTED]  
**Cc:** Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>  
**Subject:** FW: Meeting With Amazon Follow Up

Hi [REDACTED]

Are you happy for me to send this up to MiCase for a response?

Many thanks

[REDACTED] to Lorna Slater MSP, Minister for Green Skills, Circular Economy and Biodiversity

Scottish Government | St Andrew's House, Regent Road, Edinburgh EH1 3DG | Email:  
[MinisterGSCEB@gov.scot](mailto:MinisterGSCEB@gov.scot)

All e-mails and attachments sent by a Ministerial Private Office to any other official on behalf of a Minister relating to a decision, request or comment made by a Minister, or a note of a Ministerial meeting, must be filed appropriately by the recipient. Private Offices do not keep official records of such e-mails or attachments.

Scottish Ministers, Special advisers and the Permanent Secretary are covered by the terms of the Lobbying (Scotland) Act 2016. See [www.lobbying.scot](http://www.lobbying.scot)

**From:** McCreadie, Jonathon [REDACTED]

**Sent:** 14 June 2022 18:49

**To:** Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

**Cc:** [REDACTED]

**Subject:** Meeting With Amazon Follow Up

Dear Minister Slater,

[REDACTED] and I wanted to pass on our thanks for your time, and that of your officials, last Wednesday. We found the meeting to be both positive and productive.

We look forward to any updates that might be available following your meeting with SEPA, including information on waste carrier fees for delivery drivers and on parity of producer liability for physical and online retailers as this is currently not clear in the regulations. From our side, we committed to follow up on a couple of points below.

**Online Takeback, parity of information with other forms of return (CSL)**

In April Circularity Scotland (CSL) shared an update on their technical designs for the return counting process. However, I note that there was little information on the provisions for Online-Takeback. In early May CSL followed this by releasing the values for Return Handling Fees (the subsidy they will provide to retailers for returning containers), but again excluded Online Takeback. Continued lack of clarity on the design and economics of this format impacts our ability to put a solution in place ahead of the regulatory timetable.

We acknowledge the point you made in the meeting regarding support for SMEs within the framework of DRS Online Takeback. While this is something we will explore, we require greater clarity from CSL on the return handling fees for OMPs so we can ensure we have the right solutions in place for our supply chain and customers.

**Waste Licences, waiver of registration fees (SEPA)**

We expected a response by 20 May to our request to waive Waste Licence fees (not the licence requirement itself). There appears to be some confusion about the nature of our AmFlex drivers. These are independent contractors who would each need to register for their own waste licences at a cost of about £200 per year in order to allow them to collect containers from customers.

Also, we note that later this year, Scottish Government and SEPA will consult on new regulations to reform this way waste management activities are authorised in Scotland. We understand that this will include proposals to reform the waste carriers system to make it simpler for users and to strengthen it where necessary to better tackle waste crime. Will this consultation seek to address the issue of licences and fees?

**Sustainability Showcase**

At the end of the call I briefly touched on a possible Sustainability Showcase event at the Scottish Parliament. The event would showcase Amazon's initiatives and innovations, allowing MSPs to talk directly to our experts delivering sustainability solutions across transportation, renewable energy, packaging and resource management, nature based solutions, sustainable shopping, and research and data programmes.

[REDACTED]

We look forward to partnering with you on the Scottish Government's circular economy and sustainability ambitions in the future.

Kind regards,

Jonathon McCreadie

Amazon UK Services Ltd.

Registered in England and Wales with registration number 03223028 with its registered office at 1 Principal Place, Worship Street, London, EC2A 2FA, United Kingdom.

**From:** [REDACTED]

**Sent:** 06 June 2022 11:43

**To:** Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

**Cc:** [REDACTED]

**Subject:** Briefing - LS meeting with Amazon - 8 June 2022 (002)

Hi [REDACTED]

Please see updated briefing, noting that [REDACTED] will also be attending the meeting, to cover DRS interests.

[REDACTED]

**From:** [REDACTED]

**Sent:** 31 May 2022 17:17

**To:** Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

**Cc:** [REDACTED] Carmichael K (Katriona) <Katriona.Carmichael@gov.scot>; [REDACTED] Huyton H (Harry) <Harry.Huyton@gov.scot>

**Subject:** Briefing - LS meeting with Amazon - 8 June 2022

[REDACTED]

Here is the briefing for Ms Slater's meeting with Jonathon McCreadie of Amazon next Wednesday at 9 am.

I will be providing support and there may also be support – yet to be confirmed – from the DRS team. That will be confirmed at the beginning of next week.

[REDACTED]

**ENGAGEMENT TITLE - Meeting with Jonathon McCreadie of Amazon**

<b>Date and Time of Engagement</b>	Wednesday 8 June 9.00am – 9.30am
<b>Where</b>	Microsoft teams
<b>Key Message</b>	Understand you have a constructive relationship with SEPA working to go beyond compliance on waste management. The proposal to ban destruction of unsold goods is a direct response to public concerns about what happens to items that go unsold. By pursuing a ban, we can make sure they make it into the hands of those that need them, and help Scotland reduce its carbon footprint.
<b>Who</b>	Jonathon McCreadie, Manager, Public Policy UK & Ireland, Amazon
<b>Why</b>	A request by Amazon to discuss Circular Economy matters including the Deposit Return Scheme and Circular Economy Bill (in particular the proposal to ban the destruction of unsold goods and reducing waste and promoting a circular economy more generally) Micase - 202200289506
<b>Official Support Required</b>	[REDACTED]
<b>Media Handling</b>	N/A
<b>Dress code</b>	N/A
<b>Greeting Party and specific meeting point on arrival (if at a non SE Building)</b>	N/A
<b>Specific entrance car/parking arrangements/secure bicycle rack</b>	N/A
<b>Briefing contents</b>	Annex A – Agenda and speaking points Annex B – Summary page with context and background Annex C – Attendees and biogs Annex D – Supplementary briefing



## **Annex A**

### **Agenda**

1. Deposit Return Scheme
2. Circular Economy Bill
3. An Amazon hyperlocal donations initiative

### **Speaking points**

#### **DRS**

- We are implementing an ambitious, all-in Deposit Return Scheme, which will be the first in the UK, from 16 August 2023.
- I am delighted that the Scottish National Investment Bank and Bank of Scotland have announced a total of £18m loan funding for Circularity Scotland.
- This is a tremendous vote of confidence in our Deposit Return Scheme (DRS) and in them as scheme administrator.
- Recently Circularity Scotland has also published details of the handling fee that will be paid to retailers operating a return point, and the specification for reverse vending machines.
- Confirming these details is a major step forward and will allow industry to move forward in its preparations to deliver the scheme.
- I am pleased to see momentum building behind Circularity Scotland as they prepare to deliver our DRS from 16 August 2023.
- Our DRS will be one of the most environmentally ambitious and accessible in Europe.

#### **CIRCULAR ECONOMY**

- It's an exciting time for circular economy in Scotland and I'm delighted to have launched two consultations on a Circular Economy Bill and a Waste Route Map.
- The Circular Economy Bill will establish the powers and legislative framework we need to support Scotland's transition to a zero waste and circular economy, significantly increase reuse and recycling rates, and to modernise and improve waste and recycling services.
- This will cut waste in our economy and preserve precious resources. To tackle the climate and biodiversity crises, we need to significantly increase reuse and recycling. By modernising waste and recycling services across Scotland, we will make it easy for people to do the right thing for the planet
- The Route Map sets out how we intend to deliver our system-wide, comprehensive vision for Scotland's Circular Economy.
- It outlines the tangible actions the Scottish Government and others must take to accelerate progress, and the tools we will put in place to enable everyone to play their part
- A circular economy also holds huge opportunities for our economy, by improving productivity and opening up new markets, and for our communities by providing local employment and access to the goods we need.

- A more circular economy is also more self-sufficient – it reduces our reliance on imported goods and materials, and provides increased economic resilience
- Together these consultations set out the key proposed actions and the tools we will put in place to help everyone play their part in cutting waste in our economy and in capitalising on the economic opportunities that a circular economy presents.

**It is absolutely senseless for perfectly good products to end up in landfill. Rather than being wasted in landfill or incinerated, they should be reused or repurposed.**

- We are living in a climate emergency. When goods go to landfill without having even been used once, we don't just waste the product – we also waste all the energy and raw materials that went into making it
- This is the sort of action that's needed to create a circular economy and shows the level of ambition in our proposals.

#### **AMAZON HYPERLOCAL DONATIONS INITIATIVE**

- I'm interested to hear about this
- What are your priorities for where you donate?
- What sort of goods do you donate?

## **Annex B**

### **DRS**

Amazon is not a member of CSL, and have not, to our knowledge, made any statements other than guidance for their selling partners: [Scotland Deposit Return Scheme – Amazon Seller Central](#)

**[REDACTED]**

## **Annex C**

### Attendees

Jonathon McCreadie: Manager, Public Policy UK & Ireland, Amazon  
[REDACTED]

[REDACTED]

## **Annex D - Supplementary briefing**

### **Alignment with rUK DRS**

- We are continuing to work with the other administrations in the UK to ensure interoperability of our schemes. However, any interaction on this would have to be on the basis of protecting the ambition level of our scheme.

### **Cost of DRS and consumer choice**

- DRS is an example of producer responsibility and, rightly, places the cost burden on producers to deal with the bottles and cans they place on the market at end-of-life. Product pricing decisions are a matter for industry.

### **Labelling**

- The DRS Regulations do not mandate adopting any label but leave this decision to industry.
- I know that Circularity Scotland is working with members to determine an approach to labelling and I would encourage you to participate in those discussions.

### **Online / Distance Takeback**

- It is vital to the success and fairness of our DRS that online retailers provide a takeback service to ensure that those who rely on online deliveries because of age, location, or disability can redeem the deposit.
- The Regulations provide flexibility over how the distance takeback service is to be delivered. For example, they allow retailers to work together to set up a system-wide solution to reduce the burden and increase efficiency.
- We are working with SEPA to provide advice and guidance to industry on putting in place such a solution. This included a workshop that my officials hosted with SEPA and retailers in February.

### **Q – What will happen to unsold durable goods?**

**A -** France has already introduced a ban on companies destroying clothes, cosmetics, hygiene products, electrical items and other unsold or returned items. Rather than landfill or incinerate unsold goods, companies will now have to reuse, donate or recycle their unsold products.

Over time, however, we would expect businesses to manage their stock control and ordering to minimise the likelihood of unsold goods.

I would be interested in learning how Amazon in France copes with the ban.

### **Q – What do you mean by mandatory reporting of waste and surplus?**

**A –** At present, we don't know how much unwanted surplus stock there is. Some UK food businesses voluntarily report their food waste and surplus annually but there is no requirement for them to make this information public. We believe that Scottish businesses can play a leading role in encouraging wider, positive behaviour changes in relation to waste by measuring and taking action on their waste and surplus. To facilitate this, we must improve our data and encourage businesses to act on, and ultimately reduce, their levels of waste.

We want businesses to identify whether they have an issue with waste and surplus in their supply chain, effectively measure it, and then act on the results. This journey of waste reduction can then be a positive and inspiring story to tell to the public and act as a key driver of wider citizen behaviour change.

### **Q – What waste streams would be subject to mandatory reporting?**

**A –** Our intention is that the initial priority for subsequent secondary legislation, with further consultation, would be to introduce reporting on food waste and food surplus. Food waste is responsible for 25% of Scotland’s total carbon waste footprint **and** an integral part of the EU Action Plan for the Circular Economy. The previous Circular Economy Bill consultation indicated broad support for mandatory public reporting of food waste and surplus.

We are also keen to explore the scope to apply this requirement to textiles and potentially other waste streams.

### **‘Sharing Library and Reuse Café’ support network**

- The Cabinet Secretary for Net Zero, Energy and Transport, announced during COP26 that the Scottish Government, along with Zero Waste Scotland, is providing £310,000 funding to establish a ‘Sharing Library and Reuse Café’ support network.
- This is being led by Circular Communities Scotland with the Edinburgh Remakery and the Edinburgh Tool library as part of its membership.
- The funding aims to increase overall numbers of repair cafe and sharing library projects in operation across Scotland to 100 over the next three years

### **Waste Electrical and Electronic Equipment (WEEE)**

- Defra are undertaking a review of the Waste Electrical and Electronic Equipment (WEEE) Regulations 2013, with the intention of consulting on the proposed approach later this year.
- As with other existing producer responsibility systems, this system is devolved but managed at a UK level by agreement between the administrations.
- The UK Government has committed to reviewing and reforming all of the existing systems.
- The Scottish Government believe this review presents an opportunity to address a number of issues which have been identified with the current WEEE system.
- The current system has been in effect since 2013 and has achieved a certain amount of success in diverting WEEE from landfill. However, there are a number of issues which have been identified which require a resolution.
- Scottish Government officials, Zero Waste Scotland and SEPA are involved in the development of the preferred approach, and the approval of Scottish Ministers will be sought before the consultation launch later this year.

## **NOTE OF MEETING OF LORNA SLATER, MINISTER FOR GREEN SKILLS, CIRCULAR ECONOMY AND BIODIVERSITY, AND AMAZON, ON 8<sup>TH</sup> June 2022**

**PRESENT:** Lorna Slater, [REDACTED] Jonathan McCreadie, [REDACTED]

Jonathon McCreadie explained that Amazon in Scotland has over 3,000 employees across Operations and R&D. Scotland is home to some of Amazon Prime Video exclusives.

[REDACTED] explained the importance given to sustainability, which is underpinned by the Climate Pledge, founded in 2019, to be net zero carbon 2040, and to which there were approximately 300 signatories. Acknowledge that packaging and waste is an issue, but Amazon has a good working relationship with SEPA. They have removed single-use plastic bags from deliveries in the UK. Amazon customers want right-size packaging and for returns have a policy of resell, donate or recycle.,

Jonathan McCreadie said that the Fulfilment Centre at Dunfermline is the returns centre for the UK and parts of Europe. Amazon has a policy to donate at the hyperlocal level – 60 charities in Fife equivalent of 287 different organisations. Scotmid and Semchem have joined their scheme as well. Amazon is happy to send the Minister information on their donations policy. They estimate to have helped 13,000 families.

After Amazon has recycled as much as possible, the remaining material is sent to energy recovery, which is a way of processing non-recyclable waste and turning it into usable sources of energy.

The service 'Amazon Warehouse' repurposes returned products. It is really popular but not well-enough known.

Amazon estimates that it will reach 100% renewable energy by 2025. They are the main off takers of a windfarm in Kintyre and will off take 350MW of a new offshore farm due to come online in 2024. Sixteen of their fulfilment centres have solar panels, 69 electric vehicles operate out of Glasgow, and five eHGVs out of Tilbury and Milton Keynes.

Ms Slater asked about the Last Mile, adding that, although it was not part of her portfolio, it was of interest, and about cargo-bikes in city centres. [REDACTED] confirmed that Amazon is rolling out cargo-bikes later this year, and also walker trolleys, using micro-mobility hubs.

Ms Slater then raised the issue of DRS and the challenge for small businesses with online sales. Legally, they are required to have a system for online take-back and she asked if Amazon could support that.

[REDACTED] said that the issue of returns counting for online take-back still had to be resolved. CSL's proposals were still under development and they were calling for parity between online and offline.

Amazon has concerns about alignment and interoperability across the four nations' schemes.

Ms Slater expressed the hope that the others would align with Scotland, and the intention was for interoperability.

The issue of the waste carrier licence was raised. The drivers are not Amazon employees, they are wholly independent contractors, so they would have to pay the licence fee of £200 – £300 a year.

Jonathan McCreadie said that Amazon had held a showcase of sustainability at Westminster, and would like to do the same at Holyrood. Ms Slater replied that any MSP could host such an event at Holyrood.

Ms Slater added that she was working with suppliers on incoming EPR [legislation?] and that she had forthcoming meetings with SEPA and CSL.