

Annex A

Document 1

From: Sam Pugh <[Redacted]>

Sent: 07 July 2022 15:41

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

Subject: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK

Dear Lorna Slater MSP,

I hope you are well.

Please find attached a letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK. The letter commends the Scottish Government's ambition to deliver a Circular Economy in Scotland, and introduces Gumtree's work to empower the people of Scotland to effortlessly sell second hand goods, extending the lifespan of products and stopping thousands of items from unnecessarily going to landfill.

We would be delighted to arrange a meeting to discuss how Gumtree can support the Scottish Government to maximise the reuse of items and reduce waste in Scotland, and explore any opportunities to collaborate on delivering your vision of a full Circular Economy

Please let me know if you require any further information or have any questions.

Many thanks,

Sam Pugh

On behalf of Gumtree UK

Document 2

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 11 July 2022 12:19

To: Public Engagement Unit <CorrespondenceUnit@gov.scot>

Subject: FW: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK

Hi for Micase as diary please.

Many thanks

[Redacted]

Document 3

From: [Redacted]@gov.scot>

Sent: 13 July 2022 15:15

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: FW: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK - case 202200310631

[Redacted], [Redacted], [Redacted]

Any views on who should lead on this one?

I haven't really got my head round what we want/need from the likes of gumtree – data? I'd be happy for CE team to lead from a general perspective but if there are specific things you want to engage with them on let me know

thanks

[Redacted]

Document 4

From: [Redacted]@gov.scot>

Sent: 13 July 2022 18:01

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK - case 202200310631

Thanks [Redacted] – to confirm from our chat earlier, if you're happy to lead on this we can feed into briefing. Two items came up, but there may be more:

- Waste crime: through the route map, Harry was keen that we investigate working with social media and online marketplace companies to close down access to illegal operators.

[Redacted] and [Redacted] are best placed to advise on this.

- Recycling/reuse: as they mention handling of large household items at local authority level in the letter, it's worth some briefing lines on recycling proposals (eg review of service charging / statutory guidance for LAs / some of the reuse projects we are funding through RIF).

[Redacted]

Document 5

From:[Redacted]@gov.scot>

Sent: 19 July 2022 16:08

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

Cc: [Redacted]@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Good afternoon [Redacted],

I just wanted to follow on from [Redacted] email to say that I am still pursuing a few contacts and I aim to forward the finalised letters by the end of the month.

Thanks a lot

Best wishes

[Redacted]

Document 6

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 19 July 2022 19:29

To: [Redacted]@gov.scot>; Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

Cc: [Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Thanks [Redacted] – can we have the letters before the end of the month?

Please let me know who is best placed to meet with Ms Slater following her comments below and we'll see what's possible with diaries.

[Redacted]

Document 7

From: [Redacted]@gov.scot>

Sent: 20 July 2022 09:21

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

Cc: [Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Thanks [Redacted], I will do.

Regarding the names for a meeting could you invite [Redacted], [Redacted] and myself please? I think [Redacted] may be looking at co-ordinating diaries.

Thanks again

[Redacted]

Document 8

From: [Redacted]@gov.scot>

Sent: 22 July 2022 11:47

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK - case 202200310631

Hi all,

Picking up this email chain after a few weeks off. We can certainly contribute in relation to waste crime. We actually have a draft letter ready to go to Gumtree (and others) seeking their engagement and a meeting in relation to online waste adverts so it would make sense to closer align/ bring together these responses.

Happy to liaise further with whoever's coordinating the response.

Thanks,

[Redacted]

Document 9

From: [Redacted]@gov.scot>

Sent: 22 July 2022 12:04

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK - case 202200310631

Thanks [Redacted]

Agree it makes sense to align these. I've tweaked a draft [Redacted] had pulled together below to try and take account of your email. That work for you?

Background

The Chief marketing officer at Gumtree UK, Hannah Rouch, is writing to request a meeting with the Minister to introduce the work Gumtree does for the CE and to explore how can they support the SG's mission to maximise the reuse of items, reduce waste in Scotland, protect the environment and reduce emissions. We will shortly be providing separate advice and a draft letter to Gumtree (and others) seeking their engagement and a meeting in relation to closing down access to illegal waste operators. We would recommend accepting this invitation as it provides an opportunity to both discuss measures in relation to tackling illegal operators and also general engagement on Circular Economy matters.

Accept

Thank you for your letter dated 7 July 2022 inviting the Minister for Green Skills, Circular Economy and Biodiversity to a meeting to discuss issues related to Scotland's Circular Economy Bill and how to help reduce waste in Scotland.

The Minister would be delighted to accept your invitation subject to parliamentary business and diary availability. I would be grateful if you would contact the Minister's Diary Secretary via e-mail at MinisterGSCEB@gov.scot to make the necessary arrangements.

Decline

Thank you for your letter dated 7 July 2022 inviting the Minister for Green Skills, Circular Economy and Biodiversity to a meeting to discuss issues related to Scotland's Circular Economy Bill and how to help reduce waste in Scotland.

Unfortunately due to diary pressures the Minister is unable to meet at this time but she asked me to pass on her thanks and best wishes for your work helping the Circular Economy.

[Redacted]

Document 10

From: [Redacted]@gov.scot>

Sent: 25 July 2022 09:12

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Letter from Hannah Rouch, Chief Marketing Officer at Gumtree UK - case 202200310631

Thanks [Redacted]. Very minor tweak below, otherwise looks good from my perspective.

[Redacted] – to note re flytipping letter to Gumtree.

[Redacted]

Document 11

From: [Redacted]@gov.scot>

Sent: 29 July 2022 18:44

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

Cc: [Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Good afternoon,

I attach three letters to online organisations for those where I have named contacts, Facebook and Gumtree.

Regarding the letters to Gumtree I have added a short paragraph to acknowledge recent contact from Hannah Rouch, Chief Marketing Officer, Gumtree UK, who recently wrote to request a meeting with Ms Slater to discuss how Gumtree can support the Scottish Government and explore any opportunities to collaborate on delivering its vision of a full Circular Economy.

I am also continuing the search for the right contacts in other organisations and will advise as soon as possible.

Warm regards
[Redacted]

Document 12

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 03 August 2022 13:35

To: [Redacted]@gov.scot>; Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

Cc: [Redacted]@gov.scot>; Director of Environment & Forestry <director.enfor@gov.scot>; Carmichael K (Katriona) <Katriona.Carmichael@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>; Communications Net Zero & Rural Affairs <CommunicationsNetZero&RuralAffairs@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

[Redacted]

Ms Slater was content with the letters (the signed versions that issued are attached for records) and asked me to pass on her thanks – she looks forward to continued work in this area.

I've extended the copy list again to include Comms for advice on handling (in liaison with Spads) and policy for a publicity campaign in this area.

[Redacted]

Document 13

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 31 August 2022 16:34

To: Minister for Green Skills, Circular Economy and Biodiversity
<MinisterGSCEB@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

[Redacted]

Just checking on responses to Ms Slater's letters to Gumtree and Facebook – we've had a response from Gumtree (and have a meeting in the diary on 6 October, but nothing yet from Facebook, unless there's been any response to the team?

I don't think there's been any response to meetings/responses there have been on the letters to online advertising platforms?

[Redacted]

Document 14

From: [Redacted]@gov.scot>

Sent: 01 September 2022 11:16

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

Cc: [Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Good morning [Redacted],

Just to confirm that I have not received additional replies. I have also checked the team mailbox and no reply there either.

I have blocked time out in my diary for the Gumtree meeting on 6 October but not received the invitation. Please forward it if I need to attend.

Thanks a lot

[Redacted]

Document 15

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 05 September 2022 11:25

To: [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Thanks [Redacted] – you should have the scheduler now. Official support will be required at this meeting.

[Redacted]

Document 16

From: [Redacted]@gov.scot>

Sent: 28 September 2022 12:02

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

Cc: [Redacted]@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Good afternoon [Redacted],

I am working on the engagement briefing for Ms Slater and planning to send it to you Tuesday 4th.

Would this be acceptable and give the minister sufficient time?

Did Gumtree confirm the attendees list?

I understand Hannah Rough, Chief Marketing Officer, will attend but wondered if [Redacted]and [Redacted]had responded to Ms Slater's letter and would join Ms Rough.

Thanks a lot

[Redacted]

Document 17

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 28 September 2022 12:59

To: [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

Subject: RE: Submission – Tackling Flytipping – Measures to address online trading and promote public engagement

Hi [Redacted]

By this Friday at 16:00 would be better at the latest as Ms Slater looks over all her briefings over the weekend and this gives PO time to send them across to her.

Gumtree didn't confirm attendees with me but I had emailed Sam Pugh [Redacted]

To confirm the meeting so he would be your best bet.

Many thanks

[Redacted]

Document 18

From: [Redacted]

Sent: 28 September 2022 14:04

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

Cc: [Redacted]@gov.scot>

Subject: RE: Submission - Tackling Flytipping - Measures to address online trading and promote public engagement

Hi [Redacted],

Thanks for confirming.

I'll have a briefing with you Friday pm.

Thanks again

[Redacted]

Document 19

From: [Redacted]@gov.scot>

Sent: 30 September 2022 11:56

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

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

Subject: Ministerial Briefing - Meeting with Gumtree Thursday 6 Oct - 11:15 - RE:
Submission - Tackling Flytipping - Measures to address online trading and promote public
engagement

Good morning,

Please find attached the briefing for Ms Slater's meeting with Gumtree on Thursday at 11:15.

Sam Pugh confirmed that he will be joined by Robyn Greenacre, Head of PR and
Communications, and Hannah Rouch, Chief Marketing Officer, at Gumtree UK.

Have a nice week-end when it comes

Best wishes

[Redacted]

Document 20

From: [Redacted]@gov.scot>

Sent: 29 September 2022 13:23

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Hi both,

I have uploaded the draft briefing to eRDM as agreed.

'Ministerial Briefing - Meeting with Gumtree UK - CE and Waste crime - Thursday 6 October 11-15' - <https://erdm.scotland.gov.uk:8443/documents/A40779986/details>

[Redacted], can you add the CE lines in both the intro and under the agenda point please?

And [Redacted] can you check the waste crime part please and add anything I may have missed (particularly around sensitivities)?

I followed the format from [Redacted]'s exemplar briefing so didn't split the speaking note from the briefing (the template from PO state the minister's preference is for a separate speaking note, but I guess it is for larger meetings?).

Regarding attendees I have emailed Sam Pugh. PLMR were appointed by Gumtree to do all Public Affairs related engagement so it's not clear if Hannah Rough, who initially contacted Ms Slater to suggest a meeting will be attending. I will update when I receive confirmation.

And finally when sending the briefing to PO should I include the letters from and to Gumtree (one received from Hannah Rough, and the one sent re tackling waste crime)?

Thanks

[Redacted]

Document 21

From: [Redacted]@gov.scot>

Sent: 29 September 2022 13:27

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: RE: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Thanks [Redacted]. What's the deadline for contributions, am I right in thinking that PO needs this by tomorrow PM?

[Redacted]

Document 22

From: [Redacted]@gov.scot>

Sent: 29 September 2022 14:02

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: RE: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Sorry, I should have added that deadline.

PO need the briefing back by 16:00 tomorrow latest to give them time to forward on.

Ms Slater reviews all her briefings over the week-end.

Thanks

[Redacted]

Document 23

From: [Redacted]@gov.scot>

Sent: 29 September 2022 16:45

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Thanks [Redacted]

I've added in some general CE lines

Just adding **[Redacted]** as Gumtree mention a survey they did of LAs in England in case anything further to add around that (original letter here MiCase - View Case 310631)

[Redacted]

Document 24

From: [Redacted]

Sent: 29 September 2022 18:03

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Thanks a lot [Redacted],

[Redacted], feel free to add any lines if appropriate. I need to return to PO by 4pm so if you had some time to spare before 3pm I'd be really grateful. 'Ministerial Briefing - Meeting with Gumtree UK - CE and Waste crime - Thursday 6 October 11-15' - <https://erdm.scotland.gov.uk:8443/documents/A40779986/details>

Thanks again

Nathalie

Document 25

From: [Redacted]@gov.scot>

Sent: 30 September 2022 08:07

To: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>

Subject: RE: Draft briefing - Ms Slater meeting Gumtree to discuss CE & tackling waste crime

Morning all,

Also to say Sam Pugh confirmed who'd be attending the meeting. I updated the briefing last night with the names.

Thanks again

[Redacted]

Document 26

From: [Redacted]@gov.scot>

Sent: 10 October 2022 17:25

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

Cc: [Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>

Subject: Ministerial call with Gumtree 6 October - meeting notes

Good afternoon,

Following the Minister's positive meeting with Gumtree last week here is a note of key points and actions.

Please let me know if Ms Slater would like anything else reflected.

Thanks a lot,

[Redacted]

Gumtree meeting – Thursday 6th October 11:15-11:45

Present:

Hannah Rough, Chief Marketing Officer, Gumtree UK,

Robyn Greenacre, Head of PR and Communications, Gumtree UK

Sam Pugh, PLMR

Meeting purpose:

- to find out more about Gumtree's role in the circular economy
- to explore possible collaborations to tackle waste crime
-

Promoting the circular economy and waste prevention through re-use.

The 22 year old Gumtree platform has moved its focus to promote the value of heritage in the circular economy context and appeal to the younger generations (18-34), champions of change, aiming to support them tackle the cost of living and climate crisis with a big focus on around Circular Economy, sustainability and achieving behavioural change on consumption.

Current activity:

- Targeting the 18-34 audience, traditionally more interested in fashion, to promote repurposing / refurbishing items, making economic savings and helping achieve climate goals
- Drawing attention to local Household Waste Recycling Centres for goods disposal
- Promoting thrift culture with freebie pop-ups and social media influencers

Messaging:

- Second hand is not second best, encouraging users to re-use and reduce waste
- Promoting quality of experience and individuality
- Promoting craftsmanship and repurposing to give items a new lease of life

Gumtree have ambitions to

- Collaborate with Local Authorities, wider government policy areas, and local communities.
- Launch a circular collective, with online competitors and shops
- Promote a culture of responsible resale and circularity for shops to encourage their customers to use Gumtree (or others) to recycle their old items rather than send to landfill.

Preventing waste crime (at householder and waste carrier level)

Current activity

- Active relationship with the Environmental Agency and LAs in England identifying and sharing insights to highlight suspicious / illegal activity on their platform
- Adverts include report button for platform users to highlight suspicious adverts, with a dedicated team monitoring
- Guidance provided for people using waste carrier services

Gumtree are aware of the service provided by SEPA re checking waste carrier licenses.

Gumtree committed to:

- Responding to your letter to [Redacted] where you asked for Gumtree to include waste licencing registration numbers on adverts
- Sharing previous campaigns which have sought to address similar issues
- Exploring options to tackle illegal waste carriers advertising
- Working together with organisations and the public sector in Scotland (with a mention of Glasglow as a hotbed of activity for the plaform)

Action

SG Officials are following up with Gumtree to discuss insights and experience, explore closer working with SG and SEPA, and areas for collaboration across Scotland.

Document 27

From: [Redacted]@gov.scot> **On Behalf Of** Minister for Green Skills, Circular Economy and Biodiversity

Sent: 24 October 2022 09:29

To: [Redacted]@gov.scot>; Minister for Green Skills, Circular Economy and Biodiversity <MinisterGSCEB@gov.scot>

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

Subject: RE: Ministerial call with Gumtree 6 October - meeting notes

This email is for the official record and confirms a Ministerial Decision. This email must be placed in the official record (eRDM) by your team in line with SG records management policy.

[Redacted]

Ms Slater is content with the note, thank you.

[Redacted]

Document 28

From: [Redacted]@gov.scot <[Redacted]@gov.scot>

Sent: 06 October 2022 12:00

To: [Redacted]@zerowastescotland.org.uk>; [Redacted]@sepa.org.uk>

Cc: [Redacted]@gov.scot>

Subject: FOR INFO - NLFS - Gumtree engagement - waste crime and innovation

Hi,

[Redacted] and I joined a Ministerial call this morning with Gumtree on the CE Bill/ their general commitment to CE. There were however some useful follow-up opportunities in relation to the NLFS.

Gumtree spoke about their efforts to address illegal waste carriers using their platform. They focused on:

- How they work with the Environment Agency, and some LAs, to share trends and insights to highlight suspicious / illegal activity on their platform
- Report button function for users to highlight any issues with adverts and associated user guidance

They did mention SEPA in relation to the first bullet but my understanding is that this engagement doesn't happen at present? We will follow up with Gumtree to explore what more can be done in a Scottish context. If this conversation is positive I would suggest that we add content to the NLFS to illustrate how we're working with such platforms to tackle this issue.

They also said that they'll consider how/ if they could include relevant waste licencing info on adverts, and share some previous campaigns on how they've addressed similar issues. More broadly, they noted their interest in supporting strategy development/ innovative activity in the CE/waste sphere, and would be happy for us to link them up with relevant innovative activity in Scotland to explore how Gumtree can support such initiatives.

[Redacted], would you be able to follow up with Robyn and Sam to purpose a follow-up conversation on the two main areas above (partnership working and displaying waste carrier info). [Redacted] and [Redacted], I was planning to propose a joint SG/ZWS/SEPA follow-up if you're happy to join?

Thanks,

[Redacted]

Document 29

From: [Redacted]@zerowastescotland.org.uk>

Sent: 06 October 2022 13:46

To: [Redacted]@gov.scot>; [Redacted]@sepa.org.uk>

Cc: {Redacted}@gov.scot>

Subject: RE: FOR INFO - NLFS - Gumtree engagement - waste crime and innovation

Hi [Redacted],

Thanks for sharing and it sounds like a positive meeting.

Either I or someone else in the team would be happy to join any future call to discuss future opportunities to work proactively on delivery of the strategy.

Thanks

[Redacted]

Document 30

From: [Redacted]@sepa.org.uk>

Sent: 12 October 2022 15:20

To: [Redacted]@zerowastescotland.org.uk>; [Redacted]@gov.scot>

Cc: [Redacted]@gov.scot>

Subject: RE: FOR INFO - NLFS - Gumtree engagement - waste crime and innovation

Hi [Redacted],

Sorry for the delayed response. Glad to hear the meeting went well and would be happy to support any follow up meetings with Gumtree.

I'd also like to bring along a colleague from enforcement who has been involved in some work looking at targeting people offering waste services through online platforms if that's ok.

Thanks,

[Redacted]

Document 31

From: [Redacted]

Sent: 12 October 2022 17:27

To: r@sepa.org.uk>; [Redacted]@zerowastescotland.org.uk>; [Redacted]@gov.scot>

Subject: RE: FOR INFO – NLFS – Gumtree engagement – waste crime and innovation

Hi [Redacted],

Thanks a lot for confirming.

It does make sense to invite your enforcement colleague along too, if you send me their name I'll add them to the invitation.

I haven't heard back from Gumtree but will keep you and [Redacted] in the loop.

Thanks again

[Redacted]

Document 32

From: Sam Pugh <[Redacted]>

Sent: 15 December 2022 15:31

To: Minister for Green Skills, Circular Economy and Biodiversity
<MinisterGSCEB@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;
[Redacted]@gov.scot>

Cc: Greenacre, Robyn <rgreenacre@gumtree.com>; Rouch, Hannah
<hrouch@gumtree.com>

Subject: Gumtree UK | Disposing Waste Responsibly This Christmas

Hi all,

I hope you're well.

You'll recall that we met earlier this year to discuss encouraging the safe disposal of waste. As part of Gumtree's ongoing efforts to support safe and sustainable waste removal practices, I wanted to share with you a blog we have published which offers useful guidance for our users on this topic as we approach Christmas:

Gumtree UK: Safely disposing of your unwanted items this Christmas

As you'll be aware, household waste increases during the festive period as individuals receive items they do not want, or consider getting rid of items they no longer need. At Gumtree, we are committed to supporting the circular economy and here we encourage our community to first prioritise rehoming unwanted items, either by selling them or posting a listing in our Freebie category.

Where this isn't an option, you'll see that this article directs our community to the Scottish Environment Protection Agency's Register of Waste Carriers and Brokers. We're passionate about taking care of our environment and want our users to be equipped with the knowledge to only use responsible waste disposal carriers.

Given Gumtree and the Scottish Government's mutual goal of realising a circular economy, demonstrated by the excellent work of Zero Waste Scotland, we welcome you sharing this article across your communication channels to raise awareness of the need for individuals to consider disposing of waste responsibly this Christmas.

Please let me know if you have any questions about this.

Many thanks,

Sam Pugh

Document 33

From: [Redacted]

Sent: 25 October 2022 10:20

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

Cc: Director of Environment & Forestry <director.enfor@gov.scot>; Carmichael K (Katriona) <Katriona.Carmichael@gov.scot>; Huyton H (Harry) <Harry.Huyton@gov.scot>;

[Redacted]@gov.scot>; [Redacted]@gov.scot>; [Redacted]@gov.scot>;

[Redacted]@gov.scot>

Subject: DRS - Briefing - Lorna Slater - Monthly Meeting with CSL - 25 October 2022

(A41089228)

Importance: High

PS Minister for Green Skills, Circular Economy and Biodiversity,

Please find attached briefing for the meeting today at 16:00 with CSL.

[Redacted]

<< File: DRS - Briefing - Lorna Slater - Monthly Meeting with CSL - 25 October 2022.docx

>>

[Redacted].

Document 37

Minister for Green Skills, Circular Economy and Biodiversity meeting with the Scottish Grocers' Federation (SGF)

12 October 2022

St Andrew's House

Present

Minister for Green Skills, Circular Economy and Biodiversity (LS)

[Redacted]

[Redacted]

Katriona Carmichael, Deputy Director, Circular Economy Division, Scottish Government (KC)

[Redacted]

Harry Huyton, Special Advisor, Scottish Government (HH)

Main discussion points and actions

Retailer Handling fee / Return points

It was noted that LS could not talk in detail on the retailer handling fee due to ongoing legal proceedings.

[Redacted]

Exemptions

SGF had previously raised concerns around legality of exemptions process and requirement for business to share confidential data with competitors. Any proximity exemptions system must be confidential. Despite SGF requests, no partner had come forward to deliver this system.

SGF had asked SG to fund Biffa to carry out a mapping exercise. [Redacted] noted that a mapping service would shortly be available. [Redacted] noted that SGF had not been involved and that he did not expect this to cover all return points. More information was needed on the usability of the tool, and the effect on data and sought more detail on how the tool would work.

ACTION – Scottish Government to facilitate sharing of information on the mapping tool with SGF.

[Redacted] raised concerns that SGF's views had not been heard during the ongoing DRS process, citing significant amounts of work being done by meeting attendees and other on DRS. Concerns were raised regarding the quality of minutes of previous meetings with ZWS that had not highlighted SGF concerns.

SGF proposed that "parade solutions" to shared return points had not been fully explored by interested parties, but had the potential to offer an effective approach for small retailers in close proximity.

ACTION – SGF to provide written information on parade proposals, outlining the proposition, progress and blockers.

[Redacted] raised concerns that the retailer handling fee would not be cost neutral. There were concerns regarding lack of information from CSL on RVM specifications, space required and uplifts. This lack of information was preventing retailers from being able to determine if an exemption would be needed, or to plan for the scheme.

[Redacted] raised concerns that there was a lack of financing from banks, including the Scottish National Investment Bank for the purchase of RVMs.

It was SGF's view that CSL was pushing for a supermarket based model that would deny their members footfall. SGF was clear that its members wished to participate in DRS but were not being adequately engaged or listened to.

Price Marked Packs (PMP)

[Redacted] provided an update that SEPA and Trading Standards had confirmed that the deposit price did not have to be marked on a PMP. This was welcomed and noted.

Cut-Over

LS acknowledged the need for operational clarity and updated that she was expecting CSL to provide this information in the coming weeks.

[Redacted] expressed frustration that CSL had been working with supermarkets and not SGF. He cited concerns relating to CSL's approach to branding on RVMs. It is SGF's view that this approach goes beyond the powers of scheme administrator. [Redacted] asked LS if Scottish Ministers could intervene where CSL is not abiding by the scheme regulations.

LS emphasised that as an industry led scheme, CSL and members should resolve non-legislative issues. [Redacted] noted that SGF voting powers did not give it leverage within CSL and there is, therefore, no recourse.

Online takeback

[Redacted] stated that SGF wishes to see the mandatory obligation removed from the scheme, citing suggestions that small producers will stop selling into Scotland should it go ahead.

LS noted concerns, which were widely held across industry. She was considering options that would lessen the burden of online takeback while maintaining support for those people who might not otherwise be able to reclaim deposits. She asked for views on what a workable scheme might look like.

[Redacted] suggested that many retailers would undertake voluntary collections for disabled or vulnerable people. [Redacted] suggested a scheme that applied to registered disabled or elderly people would be more workable.

ACTION – Officials to engage with SGF on online takeback.

VAT

All agreed that ideal position would be that VAT should not be applied to deposits.

LS noted her frustration on this issue and that the change in the UK Government had slowed progress. She assured the group that she was urgently seeking a resolution from the Treasury.

Other issues

[Redacted] asked if SEPA could determine the timing of deposit cash flows to mitigate against retailers with longer payments terms gaining an advantage.

ACTION – Officials to discuss with SEPA.

Summing up

LS thanked SGF for constructive input and noted the concerns set out. [Redacted] asked for help to encourage engagement from CSL, SEPA and ZWS with SGF, and also asked for clear feedback from this meeting.

A series of further actions were agreed.

ACTION – SGF to put proposal regarding workable online system in writing.

ACTION – Scottish Government officials to work closely with SGF in coming weeks.

ACTION – Scottish Government to share notes of this meeting with SGF.

ACTION – 6 weekly meetings to be set up between LS and SGF.

Document 35

What	Meeting with representatives from Deliveroo, Uber Eats, and Just Eat to discuss Scotland's DRS
Where	MS Teams: Click here to join the meeting
When	6 October 2022 09:00 – 09:30
Key Message(s) and structure	<ul style="list-style-type: none"> • I am strongly committed to introducing DRS on the 16th of August 2023. Scottish Ministers have been clear and consistent that this date will not change. • Implementation is now well underway. I am continually impressed by how business of all types and sizes are stepping forward to prepare for the scheme. • I recognise that your businesses have concerns over online takeback. • Online takeback is needed to ensure DRS is accessible to everyone, but I want to be pragmatic about what you can deliver. • I am looking at all options to ensure that takeback that can be delivered by next August, including considering targeted amendments to the Regulations..
Who	<ul style="list-style-type: none"> • [Redacted], Deliveroo • [Redacted], Uber Eats • [Redacted], Just Eat
Why	An opportunity to address the concerns raised by these companies, and in particular, their concerns regarding the takeback obligation.
Expected Outcome	Parties are reassured that their concerns regarding DRS are being addressed.
Supporting officials	<p>[Redacted], Extended Producer Responsibility [Redacted]</p> <p>Mob: [Redacted]</p> <p>[Redacted], [Redacted] – DRS</p>

Briefing contents	Annex A – Meeting agenda and top lines
Media Handling / Social Media	N/A

ANNEX A: Proposed Agenda & Lines

Background: Meeting requested by representatives of Deliveroo, Uber Eats and Just Eat to discuss their organisations' concerns, notably that they will be obliged to offer a takeback service in line with the current DRS Regulations.

All three companies use predominately self-employed couriers to deliver goods from third parties, usually takeaway food and drink, as well as groceries. Most couriers use either their own car, motorbike or bicycle.

Agenda:

You will chair

1. Welcome and industry overview
2. Distance/ online Takeback - issues and solutions

Welcome & opening remarks (09:00 – 09:05)

- Thank you again for your continued engagement on Scotland's Deposit Return Scheme. It is good to have this opportunity to meet with you all.
- You'll know that I'm committed to introducing Scotland's Deposit Return Scheme on 16 August 2023.
- I'm also committed to working with you to make sure we have pragmatic approaches to implementation.
- I'm keen to use today to understand more about the challenges to implementation you are facing, particularly regarding online takeback.

Invite attendees to introduce themselves and set out progress towards implementing the scheme, and any specific challenges.

Distance / online takeback – concerns and solutions (09.05 – 09.30)

Invite attendees to briefly outline the challenges they are facing.

Remain committed to having a distance takeback system that ensures DRS is accessible to everyone, but that you want to be pragmatic about what industry can deliver.

[Redacted]

Document 36

What	This is the October monthly meeting with Circularity Scotland Ltd (CSL) to update you on their progress implementing Scotland's Deposit Return Scheme (DRS)
Where	Microsoft Teams Click here to join the meeting
When	CSL 2022 16:00 – 17:00
Key Message(s) and structure	<ul style="list-style-type: none"> • I know that achieving a cost-efficient return network is currently your top priority. My officials continue to work with you to help achieve this. • [Redacted] • I am grateful for the work you have been doing [Redacted]. Critical that we have a simple and reliable method for managing blackspots.
Who	[Redacted] [Redacted] [Redacted]
Why	This is an opportunity to discuss progress on implementing DRS.
Expected outcome	You are assured that CSL are taking the appropriate steps to implement and de-risk the scheme in time for launch in August next year.
Supporting officials	Redacted], [Redacted] DRS Unit Mobile: [Redacted] Katriona Carmichael, Deputy Director, Circular Economy Division [Redacted], Deposit Return Scheme Team [Redacted]

Briefing contents	<ul style="list-style-type: none"> • Annex A: Proposed meeting structure & top lines
Media Handling / Social Media	N/A

ANNEX A

Agenda (with suggested timings)

- | | |
|--------------------------------------|--------------------------------|
| 1. Progress update | (5 mins: 16.00-16.05) |
| 2. Critical discussion points | (35 mins, 16:05--16:40) |
| a. RPO Exemptions | |
| b. VAT | |
| c. [Redacted] | |
| d. Takeback scope reduction | |
| 3. [Redacted] | |
| 4. AOB / Date of Next Meeting | |

You will chair.

1. Progress update (16:00 – 16:05)

Purpose: Opportunity for CSL to provide you with an update on their delivery progress.

Key Messages/Conversational Points

- **Invite CSL to update on their delivery progress.**
- Welcome progress made.
- Note that **businesses continue to highlight that they lack key operational information**. Officials have shared requests from businesses with CSL.
- [Redacted]

2. Critical discussion points (16:05 – 16.40)

CSL has asked to discuss the following topics:

a. Reducing the cost of scheme operation – RPO Exemptions

Purpose: To provide assurance that understand the importance of this topic, and that you intend to confirm the updated approach this week.

Key Messages/Conversational Points

- **My officials will provide me with final advice for decision this week.**

- We will need to use the existing exemptions system to reduce the number of return points. My officials have been working with you closely on our potential approach, and the steps you can take to work with retailers.
- **I cannot move forward with a decision until I better understand what you will do to mitigate any resulting gaps to access. Can you share any details on this?**
- We are committed to supporting the updated exemption process to help achieve a deliverable and cost efficient scheme.

[Redacted]

[Redacted]

Purpose: To understand the implications of the VAT delay for CSL, and what mitigating actions are possible.

Key Messages/Conversational Points

- [Redacted]
- We have engaged with UK Government at all levels over the last few weeks to emphasise the impact of this delay.
- We are pushing for a temporary VAT exemption until the UK DRS scheme comes into force, to mitigate the risks.
- If this approach is not accepted, **what additional actions do you view as necessary** to be ready for next August?

Sensitivities/Issues to Avoid

[Redacted]

Key Messages/Conversational Points

- tbc
- [Redacted]

d. Takeback scope reduction

Purpose: CSL are seeking to ensure that the revised online takeback model is not expensive or environmentally unfriendly.

Key Messages/Conversational Points

- Takeback service is a vital part of the scheme which will protect access to DRS for consumers who depend on online deliveries.

- Officials have discussed the proposed approach to takeback with CSL. The revised approach seeks to provide further flexibility for retailers to provide an efficient service.
- We believe that a core takeback service is deliverable by next August, and are working with retailers to understand what this could look like.
- **What can CSL do** to support an online takeback service?

[Redacted]

Key Messages/Conversational Points

- [Redacted]

[Redacted]

[Redacted]

[Redacted]

6. AOB / Date of Next Meeting (16:55-17:00)

- The next meeting is scheduled for 22nd November, but may need to be rearranged to accommodate the DRS conference.

Document 40

Monthly meeting with Circularity Scotland Ltd

25 October 2022

16:00 – 17:00

By MS Teams

Attendees

Minister for Green Skills, Circular Economy & Biodiversity

[Redacted]

[Redacted][Redacted]Katriona Carmichael, Scottish Government

[Redacted]Summary meeting note

After a general progress update, discussion focussed on a set key issues including guidance on return point exemptions, VAT and the online takeback model.

[Redacted]

[Redacted]

A big issue on cutover is how the customer is guided through it. This means that CSL will not want to overdo launch in August. DRS will be a scheme that builds. [Redacted]

Document 41

What	Meeting with the Scottish Grocers' Federation (SGF) to discuss Scotland's Deposit Return Scheme.
Where	St Andrew's House Room 4W.01
When	12 October 2022 10:00 – 11:00
Key Message(s) and structure	<ul style="list-style-type: none"> • I am strongly committed to introducing DRS on the 16th of August 2023. Scottish Ministers have been clear and consistent that this date will not change. • Implementation is now well underway. I am continually impressed by how business of all types and sizes are stepping forward to prepare for the scheme. • I recognise that your members have concerns over elements of the scheme. I would like reassure you that I am continuing to work with businesses, Circularity Scotland and SEPA to ensure pragmatic solutions are in place. • Now is the time for businesses to push ahead with delivery to ensure they are ready for scheme launch in August next year.
Who	<ul style="list-style-type: none"> • [Redacted], SGF • [Redacted][Redacted], • [Redacted]
Why	An opportunity to address the concerns raised by SGF in letter of 29 September, and to demonstrate your continued engagement and commitment to finding pragmatic solutions to their concerns.
Expected Outcome	Attendees feel that their concerns have been listened to, and that the Scottish Government will continue to work with CSL, SEPA and others to find pragmatic solutions.
Supporting officials	<p>[Redacted], [Redacted], Deposit Return Scheme [Redacted], Mob: [Redacted]</p> <p>Katriona Carmichael, Deputy Director, Circular Economy Division</p>

	[Redacted], Deposit Return Scheme [Redacted]
<i>Briefing contents</i>	Annex A – Proposed meeting structure and lines Annex B – Organisation 31 and biographies Annex C – SGF correspondence (attached separately)
<i>Media Handling / Social Media</i>	N/A

ANNEX A: Proposed Meeting Structure & Lines

You will chair.

[Redacted]1. Welcome & opening remarks (14:00 – 14:10)

Invite representatives from SGF to introduce themselves. [Redacted] attended a stakeholder meeting you held on 7 September.

[Redacted]

- I am grateful for you coming here to meet with me today, and for the time and effort you have already put in to engaging on the deposit return scheme, including through the system-wide assurance group. Thank you for your ongoing support.
- You'll know that I, and all Scottish Ministers, remain strongly committed to introducing Scotland's Deposit Return Scheme on 16 August 2023. I am encouraged by the huge amount of work underway across Scotland to prepare for DRS.
- I have appreciated your correspondence setting out the key issues your members are facing. It is important to me that we have problem solving dialogue throughout this crucial period, in response to the types of challenge you raise.
- I am aware that CSL's approach to the retail handling fee is currently the subject of legal action, so I won't be able to get into a detailed discussion on this issue.
- My priority today is to understand your other concerns in more detail. I would like to reassure you that I'm already working on all the issues highlighted to make sure we have pragmatic solutions in place. I want to continue to work with you to achieve this.
- The issues you highlighted were exemptions, price marked pack, cut-over, online takeback, and VAT. I suggest we run through what you feel is needed to resolve each of these, but first want to take the opportunity to check if there is anything else you want to cover today.

2. SGF concerns (10.10 – 10.55)

Concern 1 – Retailer handling fee

[Redacted]

Background – SGF believes that the retailer handling fee is insufficient and CSL are refusing to explain or justify this. Members are unable to order RVM's due to the upfront financial cost.

[Redacted]

[Redacted]

Concern 2 - Exemptions

Background – SGF have requested that Scottish Government should provide funding to Biffa to conduct a mapping exercise to support the proximity exemptions process. They also state that retailers are not willing to provide data to competitors to secure an exemption.

- [Redacted]

[Redacted]

Concern 3 – Price marked packs (PMP)

Background – SGF are seeking clarification that the 20p deposit is not included as part of the price marked on the packaging, as well as clarity on point of sale/ labels for PMPs. Their membership firmly believe that the deposit should be clearly pointed out over and above the product selling price.

You may wish to provide assurance that there is no requirement to include the deposit in the price printed on packaging.

- [Redacted]

[Redacted]

[Redacted]

Concern 4 – Cut Over

Background – SGF are seeking clarity over a grace period around cut-over for retained EAN stock and what happens to the stock that retailers will still have.

This type of operational information is the responsibility of CSL, who are responsible for implementing the scheme on behalf of industry.

- [Redacted]
- **Note that SEPA have confirmed that retailers will still be able to sell existing stock once the scheme is live.**

Concern 5 – online takeback

Background – SGF believe that on-line takeback is proving impossible for members and regulations are not fit for purpose. They want it to be excluded from the scheme. They also have concern that CSL have also failed to publish the online takeback fee.

- [Redacted]

[Redacted]

Concern 6 - VAT

Background – SGF believe there should be no VAT on the 20p deposit and that the Scottish Government should have done more to push back on this.

- [Redacted]

ANNEX B: BACKGROUND ON SGF AND BIOGRAPHIES OF ATTENDEES

Background on SGF

- The Scottish Grocers' Federation (SGF) is the trade associate for the independent convenience store sector.
- The SGF brings together a range of retailers throughout Scotland, including Scotmid, the Co-operative Group, Clydebank Co-op, SPAR, Londis, Nisa, Costcutter, Day Today's and Keystore.
- The SGF's central aim is to ensure that the Scottish Government and Parliament creates and improves the trading environment to allow for continuing investment, job creation and development by convenience store retailers.
- They have a number of Corporate Members, suppliers to the trade, who actively support them in their role as ambassador for the convenience sector, to the media and both the Scottish and Westminster Governments.

[Redacted]

. [Redacted]

[Redacted]

[Redacted]

Document 39

What	Meeting with SIBA to discuss Scotland's Deposit Return Scheme (DRS) and their concerns re implementation
Where	Microsoft Teams Click here to join the meeting
When	31 October 2022 13:30 – 14:00
Key Message(s) and structure	<ul style="list-style-type: none"> • I am strongly committed to introducing DRS on the 16th of August 2023. Scottish Ministers have been clear and consistent that this date will not change. • I am here today to make sure I understand the pressures that small producers will face at launch, and explore the proposals you put forward in your recent letter in more depth. • I absolutely recognise that businesses have concerns over elements of the scheme's implementation, and I would like reassure you that I am continuing to work with businesses, Circularity Scotland and SEPA to ensure pragmatic solutions are in place.
Who	Jamie Delap – SIBA Scotland Director Barry Watts – SIBA Head of Public Affairs and Policy
Why	An opportunity to address the concerns raised by SIBA in their letter of 13 October, and to demonstrate your continued engagement and commitment to finding pragmatic solutions to their concerns.
Expected outcome	Attendees feel that their concerns have been listened to, and that the Scottish Government will continue to work with CSL, SEPA and others to find pragmatic solutions.
Supporting officials	[Redacted], [Redacted] DRS Unit Mobile: [Redacted] Katriona Carmichael, Deputy Director Circular Economy Mobile: [Redacted]
Briefing contents	<ul style="list-style-type: none"> • Annex A: Background and context • Annex B: Proposed meeting structure & top lines • Annex C: Biographies • Annex D: Correspondence from SIBA (attached separately)

**Media Handling /
Social Media**

N/A

ANNEX A: BACKGROUND AND CONTEXT

1. SIBA have set out the resource challenges facing small brewers in their letter and suggest that DRS will lead to:
 - small producers from outwith Scotland pulling out of the supply market
 - small brewers in Scotland becoming unviable - causing redundancies and business failures across Scotland.

 - [Redacted]

2. SIBA propose three mitigation measures. Two can be managed by CSL (dropping 'Day 1' charges for small producers, and providing 60 day payment terms). However, **the main proposal: 'treating small producer products as Old EANs for 18 months' amounts to an exemption for small producers at scheme launch.**

[Redacted]

[Redacted]

3. Today's meeting seeks to better understand SIBA's proposals, and particularly:
 - Whether the challenges faced are entirely financial (cash flow, insufficient working capital), or also operational (small producers won't be ready).

 - SIBA's view on the implications for the scheme, and how they propose these could be managed.

ANNEX B: Proposed Meeting Structure & Lines

[Redacted]

1. Welcome & opening remarks (13:30 – 13:35)

- Thank you again for meeting with me today at such short notice. I'm sorry not be able to up your offer to do this in person at your brewery [*in Cairndow, Loch Fyne*], but hope that we can still have a constructive discussion this afternoon.
- You'll know that I'm committed to introducing Scotland's Deposit Return Scheme on 16 August 2023. Thank you as ever for your continued engagement and your leadership on behalf of small brewers on this important scheme.
- I have appreciated your correspondence setting out the practical issues you're facing.
- I very much recognise the concerns you have raised over the implementation of DRS, as well as the enormous pressures facing businesses during the current crisis.
- I understand that you are particularly concerned about the initial costs and working capital requirements at scheme launch.
- I am already speaking to CSL on this issue to make sure they are playing their part in managing scheme launch for you and your members.
- I am looking to use today to make sure I fully understand your concerns, as well as the role that I can play in reaching pragmatic and workable solutions.

2. SIBA concerns (13.35 – 13.40)

You may wish to invite Jamie to summarise the challenges faced by small brewers.

3. SIBA proposals (13.45 – 13.55)

Mitigation 1 - Treat small producer products as non-scheme items for 18 mo.

SIBA wish CSL to agree to treat all products produced by small brewers as non-scheme articles for the first 18 months of the scheme (essentially, an exemption for small producers). This would also need the agreement of major retailers to continue to stock these item.

You may wish to ask:

- For details of how they see this proposal working in practice
- Why this measure specifically would assist with readiness
- What role SG might play – for example industry and CSL must manage the flow of scheme articles and retailer agreement
- What other support Scottish Government, SEPA, or CSL could provide
- How any delay would ensure readiness in future

[Redacted]

[Redacted]

Mitigation 2 – Drop Day One charges for small producers

If producers do not move to new EANs a day 1 charge will be levied of 2.4 months of producer fees. SIBA suggest it is not economically viable for producers outwith Scotland to pay that charge. They believe that small producers in Scotland do not have margins to absorb moving to new EANs, or to pay the day 1 charges.

Restate your position that this appears to be an issue that would be best resolved through discussion with CSL.

Mitigation 3 – 60 day payment terms

Most small producers will not be able to access the necessary debt to meet the working capital contribution to CSL. SIBA suggest that small producers are given payment terms to remit deposits and producer fees to CSL of 60 days from the end of the month the goods are sold. This would reduce the need for additional borrowing by small producers can be heavily mitigated or avoided.

Restate your position that this appears to be an issue that would be best resolved through discussion with CSL.

3. Summing up (13.55 – 14.00)

You may wish to:

- Thank attendees for their time and commitment to improving the scheme.
- Note that you will consider the concerns raised and what solutions could look like.
- [Redacted]
- Note that you are also looking at the exemption process for retailers and online takeback requirements – this should reduce overall scheme costs.

ANNEX C: Biographies

Jamie Delap

[Redacted]

Jamie is also the Scotland Director of the Society for Independent Brewers, representing small brewers across Scotland and the UK. [Redacted]

[Redacted].

You have previously met Jamie on 07 September and 06 October as part of meetings with food and drink trade bodies on DRS.

Barry Watts

Barry is the head of policy and public affairs for SIBA.
[Redacted]



Correspondence from SIBA

Attached separately.

Document 40

Meeting with SIBA to discuss Scotland's Deposit Return Scheme (DRS)

31 October 2022

13:30 – 14:00

By MS Teams

Attendees

Minister for Green Skills, Circular Economy and Biodiversity

Jamie Delap – SIBA Scotland Director

Barry Watts – SIBA Head of Public Affairs and Policy

Katriona Carmichael – Scottish Government

[Redacted]

Meeting notes

The meeting purpose was to ensure the Minister fully understand the concerns of SIBA members, and the role that the Scottish Government can play in reaching pragmatic workable solutions. The Minister asked Jamie Delap (JD) to provide some opening remarks.

JD asked what can small businesses do to fit into the imperative to deliver DRS by August. Most businesses are coming out of the pandemic with debt, and rapidly spiralling input costs. Craft brewing is relatively small. For example, Fyne Ales employees 5 people within their administration department. There will be lots of work for small producers to comply with DRS, and also retail spaces to manage. Implementation is still not at the point where any small businesses can plan sensibly. It was thought that there may still be a tolerable space for large producers and retailers to be ready, but this was not thought to be possible for small businesses.

JD expressed the risk that if implementation is to go live next August, it is possible that small businesses may be forced out of business. Often, these are green, sustainable businesses, which are located across the country and which employ a lot of people.

SIBA is asking for an 18 month grace period, over which time small producers' EANs are not included in the scheme, as 'scheme articles'. This would allow small businesses to get bars and shops set up properly.

LS outlined the work being taken forward on exemptions and online takeback. She confirmed that support for small producers was CSL's number one issue. The Scottish Government does not want small producers to be collateral.

In terms of timing, JD outlined that the issue is about human resource, as there is a lot of work required in implementing DRS. There is a question about whether it is viable to meet requirements, especially small producers outwith Scotland. Businesses need information to make decisions. For example, on what the SKU strategy is, what labelling requirements are and what that means for design and artwork. There is administration required for financial systems. There is a requirement for bar codes.

For many products, the logical change is to change to a OEANs and NEANs. That will require a whole sale change of products. Outside Scotland, it will not be worth taking this action, when the producer fee is combined with upfront fees. Businesses may choose not to sell into Scotland, if there is no profit for 2 years. There were thought to be too many unknowns. The largest of these is the producer agreement, and particularly the

requirements around UK SKUAs. There is not enough detail for small businesses to engage.

The Minister asked whether simplified administration or support would be helpful. JD replied that any resource such as this would help, but that there is a large diversity in the sector. The nature of supply chains, and the work that is remaining, meant that it was not possible to be ready in 8 months.

SIBA's view is that it is the larger end of the craft sector, which faces the biggest problems. There is a need to look at support for up to medium sized businesses, which collectively put about 25 million containers on the market. SIBA had also spoken to other sector industry groups, who thought it was something that could be explored.

In summary, JD outlined that SIBA has been consistent that a clear 18 months was needed to prepare. Twelve months was not suggested, in part because August is a busy period for businesses, and there will be major changes to the alcohol duty scheme. SIBA is recommending, instead, February to allow enough time to work through the issues.