

# **Scotland's Circular Economy and Waste Route Map to 2030**

**Island Communities Screening Assessment**

**Updated January 2025**

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

### Policy Aim

1. The Scottish Government is committed to moving towards a circular economy and playing its part to tackle the climate emergency. A circular economy, based on sustainable consumption and production, is essential to power Scotland's transition to a fair, green and sustainable economy, and critical to meeting our obligations to tackle the twin climate and nature emergencies. Material consumption and waste are primary drivers of nearly every environmental problem Scotland currently faces, from water scarcity to habitat and species loss.
2. Founded on evidence and collaboration, the Circular Economy and Waste Route Map (CEWRM) is part of the Scottish Government's wider response to these challenges. It is designed to drive progress on three key fronts:
  - a. Setting the strategic direction and laying foundations for how we will deliver our system-wide, comprehensive vision for Scotland's circular economy from now to 2030.
  - b. Setting out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy.
  - c. Reducing emissions associated with resources and waste.
3. In 2022, the Scottish Government set out a range of proposals across the resources and waste system through the first CEWRM consultation<sup>1</sup>. The consultation sought views on the feasibility and ambition of these proposals to drive progress against circular economy, waste and recycling goals to 2025, looking beyond to 2030, and to achieve the long-term goal of net zero by 2045. In April 2023, the analysis<sup>2</sup> of responses to this consultation was published.
4. The second and final public consultation<sup>3</sup>, which ran from 18 January to 15 March 2024, requested feedback on a revised draft CEWRM. This sought to prioritise and focus on the key actions that will unlock progress across the waste hierarchy to 2030 - along with questions on the accompanying suite of impact assessments. The consultation set out further information on specific proposals, noting that each intervention will be fully defined as the measures are developed.

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<sup>1</sup> [Delivering Scotland's circular economy - route map to 2025 and beyond: consultation](#), Scottish Government, 2022.

<sup>2</sup> [Delivering Scotland's Circular Economy - route map to 2025 and beyond: consultation analysis](#), Scottish Government, 2023.

<sup>3</sup> [Circular economy and waste route map to 2030: consultation](#), Scottish Government, 2024.

5. In August 2024, the analysis<sup>4</sup> of responses to the second consultation was published. This impact assessment builds on the findings from this analysis and reflects the [final CEWRM](#) published in December 2024<sup>5</sup>.
6. The consultation contained 24 questions about the proposals, comprising eight closed and 16 open questions. In total, there were 156 responses to the consultation from individuals (43) and organisations (113).
7. Across the consultation most respondents agreed or strongly agreed with each strategic aim, and respondents provided constructive feedback on the proposals and associated impact assessments. There were consistently high levels of support across the CEWRM's four strategic aims:
  - 77% agreed with the Reduce and reuse priority actions. 71% agreed with its further actions
  - 76% agreed with both the priority and further actions within Modernise recycling
  - 78% agreed with both the priority and further actions within Decarbonise disposal
  - 76% agreed with the Strengthen the circular economy priority actions. 81% agreed with its further actions

## **Strategic aims and associated interventions within the CEWRM**

8. The CEWRM includes a range of measures that can positively contribute to the delivery of our circular economy and resource objectives and make progress towards net zero goals. Actions have been grouped under four strategic aims, which span action across the waste hierarchy. These are:
  - A. Reduce and reuse
  - B. Modernise recycling
  - C. Decarbonise disposal
  - D. Strengthen the circular economy
9. To ensure the right structures and support are in place to enable action across the circular economy these strategic aims incorporate a number of specific interventions. Full details of these can be found in Appendix 1.

## **Interaction with other policies (draft or existing):**

10. The Circular Economy (Scotland) Act 2024 contains provisions to underpin Scotland's transition to a circular economy and modernise Scotland's waste and recycling services. The Act will require Scottish Ministers to publish a

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<sup>4</sup> [Scotland's Circular Economy and Waste Route Map to 2030: Analysis of consultation responses](#), Scottish Government, 2024.

<sup>5</sup> [Scotland's circular economy and waste route map to 2030 - gov.scot](#), Scottish Government, 2024.

strategy for a circular economy every 5 years as well as create new circular economy targets. Additional provisions include:

- Restricting the disposal of unsold goods.
- Providing local authorities and Scottish Ministers with new powers and responsibilities for collection of household waste, including allowing Scottish ministers to set the recycling targets.
- More enforcement powers to tackle issues such as fly-tipping.
- Improvement of waste monitoring.
- Powers to introduce charges for single-use items.

11. The Climate Change (Scotland) Act 2009,<sup>6</sup> amended through the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 and the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024. This Act sets out Scotland's commitment on tackling climate change, with actions laid out in the various Climate Change Plans. The update to the Climate Change Plan (2020) sets out the Scottish Government's pathway to our previous emissions reduction targets set in 2019, including the waste management sector's contribution.<sup>7</sup> A new draft Climate Change Plan will be published in 2025, in line with the changes made to our target framework by the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.<sup>8</sup> This Plan will reflect our new carbon budget targets that will be set by forthcoming secondary legislation. The CEWRM strategic aims and priority interventions all support progress towards meeting those targets.

12. Scotland's National Strategy for Economic Transformation (NSET).<sup>9</sup> The NSET sets out the priorities for Scotland's economy as well as the actions needed to maximise the opportunities to 2032 to achieve the vision of a wellbeing economy. Its vision for a Wellbeing Economy: Thriving across economic, social and environmental dimensions is supported by three ambitions, including 'Greener: Demonstrating global leadership in delivering a just transition to a net zero, nature-positive economy, and rebuilding natural capital'. A number of interventions across the CEWRM may support the NSET.

13. Just Transition – A Fairer, Greener Scotland: Scottish Government response.<sup>10</sup> Scottish Government's strategic approach to just transition is aimed at supporting the development of the NSET. There are a number of interventions within the CEWRM that will also need to align with Just Transition principles. Building just transition into our economic strategy in this

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<sup>6</sup> [Climate Change \(Scotland\) Act 2009](#).

<sup>7</sup> [Securing a green recovery on a path to net zero: climate change plan 2018–2032 – update](#), Scottish Government, 2020.

<sup>8</sup> [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2024](#).

<sup>9</sup> [Scotland's National Strategy for Economic Transformation](#), Scottish Government, 2022.

<sup>10</sup> [Just Transition – A Fairer, Greener Scotland: Scottish Government response](#), Scottish Government, 2021.

way provides a unique opportunity to work with all parts of our economy to deliver a fairer, greener Scotland. Through this work, a number of sector-focused Just Transition Plans are expected over the next few years. Through strategies such as the Green Industrial Strategy and Just Transition Plans, we will focus on the sectors with high potential for growth, identify emerging employment opportunities, and education and training provision to design and deliver activities that maximise the potential for skills development and education for a circular economy.

14. The Good Food Nation Act.<sup>11</sup> In 2024 the Scottish Government published its first national Good Food Nation Plan (GFNP)<sup>12</sup> which states “In our Good Food Nation, the people of Scotland can access and enjoy locally produced food that keeps them happy and healthy. Our food industry continues to thrive and grow. The environment is protected, biodiversity loss reversed, and our net zero ambitions achieved. A Good Food Nation enables flourishing rural and coastal communities”. Reducing food waste through redistribution and making the food system more sustainable and resilient through the measures in the CEWRM will support the ambition set out in the Act and Good Food Nation Plans by improving access to affordable food and helping to realise the food waste reduction and environmentally friendly disposal ambitions in the Act.
15. Scotland’s Biodiversity Strategy to 2045<sup>13</sup>: the strategy sets out the outcomes needed to halt biodiversity loss by 2030 and restore and regenerate biodiversity by 2045. The supporting delivery plan includes key actions the circular economy can make to achieving these key milestones.
16. The Scottish Material Flow Accounts (MFA)<sup>14</sup> show that the estimated material footprint (Raw Material Consumption) is 19.3 tonnes per capita, significantly higher than the amount experts suggest is sustainable (8 tonnes per person per year). The MFA will continue to form part of the evidence and monitoring functions used to measure progress of the CEWRM interventions.
17. The 2022 Circularity Gap Report for Scotland<sup>15</sup> found that only 1.3% of the resources used in Scotland are cycled back into the economy, with over 98% of Scotland’s material use coming from virgin resources. Measures laid out in the CEWRM for future actions may help to increase resources cycled back into the economy, reducing the need for virgin materials.
18. There are a number of extended producer responsibility (EPR) schemes in place with several reforms underway. These are:

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<sup>11</sup> [Good Food Nation \(Scotland\) Act 2022](#).

<sup>12</sup> [National Good Food Nation Plan](#), Scottish Government 2024.

<sup>13</sup> [Scottish Biodiversity Strategy to 2045 – Tackling the Nature Emergency in Scotland](#), Scottish Government, 2024.

<sup>14</sup> [Scottish Material Flow Accounts](#), Zero Waste Scotland, 2023.

<sup>15</sup> [2022 Circularity Gap Report for Scotland](#), Circle Economy & Zero Waste Scotland, 2023.

- Packaging Producer Responsibility Scheme<sup>16</sup>
  - The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024<sup>17</sup>
- Waste Electrical and Electronics Producer Responsibility Scheme<sup>18</sup>
  - Consultation on reforming the producer responsibility system for waste electrical and electronic equipment<sup>19</sup>
- Batteries and Accumulators Producer Responsibility Scheme<sup>20</sup>
- End of Life Vehicles<sup>21</sup>
- Deposit Return Scheme regulation<sup>22</sup>

19. Reforms to the existing EPR schemes will change how end of life products are managed, how local authorities may be funded to manage that waste and how reuse and repair are championed across the three schemes. For the CEWRM, changes to EPR schemes will be crucial to interventions such as changes to recycling collections and co-design of services.

## The Islands (Scotland) Act 2018

20. The Islands (Scotland) Act 2018<sup>23</sup> provides for a duty on Scottish Ministers and other relevant public bodies that they must have regard to island communities in exercising their functions and in the development of legislation.

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

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

- Describe the likely significant different effect of the legislation.
- Assess the extent to which the Scottish Ministers consider that the legislation can be developed in such a manner as to improve or mitigate, for island communities, the outcomes resulting from the legislation; and
- Set out the financial implications of steps taken under this subsection to mitigate, for island communities, the outcomes resulting from the legislation.

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<sup>16</sup> [Packaging Producer Responsibility Scheme](#), DEFRA, 2024.

<sup>17</sup> [The Producer Responsibility Obligations \(Packaging and Packaging Waste\) Regulations 2024](#).

<sup>18</sup> [The Waste Electrical and Electronic Equipment Regulations 2013](#).

<sup>19</sup> [Consultation on reforming the producer responsibility system for waste electrical and electronic equipment 2023](#), DEFRA, 2023.

<sup>20</sup> [Waste batteries: producer responsibility](#), Environment Agency, 2023.

<sup>21</sup> [Regulations: end-of-life vehicles \(ELVs\)](#), Office for Product Safety and Standards, 2021.

<sup>22</sup> [Deposit return scheme](#), Scottish Government, 2024.

<sup>23</sup> [The Islands \(Scotland\) Act 2018](#).

23. The Scottish Government's guidance sets out four preliminary stages that must be undertaken prior to preparing an ICIA. These are:
- Developing a clear understanding of the objectives and intended outcomes of the policy, strategy or service including any island needs or impacts
  - Gathering data, identifying evidence gaps and identifying stakeholders
  - Consulting with appropriate stakeholders
  - Assessing whether there are any issues resulting from the policy that are significantly different from those that would be experienced on the mainland, or on other islands

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

24. Two interim ICIA's were published as part of the Scottish Government's consultations on the CEWRM<sup>24</sup> <sup>25</sup>. This document expands on those interim ICIA's with findings from the second public consultation, with reference to the final CEWRM published in December 2024.

## Framing

25. This screening assessment seeks to complete the first two stages of the ICIA process by identifying whether there are issues which merit further exploration through research and engagement with island representatives. It also seeks to reflect on the findings and stakeholder feedback from the Route Map's 2024 consultation.
26. If the CEWRM is to achieve its ambitions throughout Scotland, including within island communities, there is an awareness that there may be specific challenges for these communities, which this impact assessment begins to explore.
27. The CEWRM is a strategic document designed to support planning to 2030 and beyond, however we recognise that not all policy measures are fully ready to be implemented in Scotland and are at different stages of development.
28. The CEWRM is focused on identifying strategic aims and associated interventions. The specific policy detail for each of these will not be fully defined at this stage. It is intended that the CEWRM will enable the Scottish Government to articulate a strategic approach which will contribute towards sustainable resource use and circular economy ambitions.

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<sup>24</sup> [Delivering Scotland's circular economy – A Route Map to 2025 and beyond Island Communities Screening Assessment](#), Scottish Government, 2022.

<sup>25</sup> [Scotland's Circular Economy and Waste Route Map to 2030 – consultation Island Communities Screening Assessment](#), Scottish Government, 2024.



29. The publication of the CEWRM will not directly impact island communities. However, there is potential, once the interventions are implemented that they may have impacts. This Island Communities Screening Assessment is therefore an overview identifying any broad likely impacts by strategic aim and not a detailed assessment of specific interventions.
30. This is the beginning of this process, rather than the end, and as we move into the implementation phase of the Route Map, the Scottish Government reiterates its commitment to work in partnership with stakeholders to assess the full impacts of specific measures. We recognise that, where appropriate, individual measures set out in the Route Map may be subject to further public consultation, for example where secondary legislation is needed. Further, more detailed ICIA's will be carried out where appropriate when individual interventions are designed and developed fully, including further engagement with stakeholders and evidence gathering as required.
31. However, to offer additional insight in the absence of fully developed interventions this document will assess each strategic aim broadly and highlight, where possible, where an impact for an island community compared to the mainland or between island groups may exist – or where there may be differences in terms of expectations, needs, experiences or outcomes.
32. Two of the interventions from the [draft CEWRM consultation](#) have already been progressed to date, with associated ICIA's as detailed below:
33. The four UK governments are introducing legislation to ban/prohibit the sale and supply of single-use vapes. While this has not been a direct result of the CEWRM, it does fulfil one of its proposed interventions. The [detailed ICIA for this policy](#) did not identify significantly different impacts for island communities but explored issues such as increased costs to consumers and reductions in waste management and cleansing costs. Full details can be seen in the Prohibition of the sale and supply of single-use vapes: ICIA<sup>26</sup>.
34. An interim ICIA has been published alongside the Charging for Single-Use Disposable Beverage Cups: Consultation<sup>27</sup>. The [accompanying interim ICIA](#) did not identify significantly different impacts for island communities but explored issues such as cost of living, shipping costs and net proceeds from tourists using reusable cups. Full details can be seen in the Single-Use Disposable Beverage Cups Charge: Island Communities Impact Assessment Report: Pre-Consultation Interim Report<sup>28</sup>.

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<sup>26</sup> [Prohibition of the sale and supply of single-use vapes Island Communities Impact Screening Assessment](#), Scottish Government, 2024.

<sup>27</sup> [Charging for Single-Use Disposable Beverage Cups: Consultation](#), Scottish Government, 2024.

<sup>28</sup> [Single-Use Disposable Beverage Cups Charge: Island Communities Impact Assessment Report: Pre-Consultation Interim Report](#), Scottish Government, 2024.



35. Alongside the first consultation on the CEWRM proposals to accelerate progress in this area, we also consulted on provisions for a Circular Economy Bill to bring forward primary legislation to underpin our key policy measures. An [Islands Communities Screening Assessment](#) was completed for Bill proposals. The Circular Economy Bill<sup>29</sup>, became an Act on 8 August 2024 and contains provisions to underpin Scotland's transition to a circular economy and modernise Scotland's waste and recycling services. The Act primarily delivers new powers that set a framework for taking action into the future. The direction and actions set out in this CEWRM are complemented by the provisions in the Act, and in some places are dependent on enabling powers created by the Act.
36. A separate Island Communities Impact Assessment was undertaken and published for the Circular Economy (Scotland) Bill in June 2023<sup>30</sup>.

## Methodology

37. An initial screening was carried out with Scottish Government and Zero Waste Scotland colleagues to identify a list of possible impacts which may apply to the strategic themes and associated interventions when they are implemented in future.
38. To focus discussion and help align potential impacts with future measures, the workshop considered each strategic theme individually. Following the workshop, desktop research was carried out to further investigate and gather existing evidence in relation to the proposals.
39. The findings of the workshop and desktop research informed the approach to engagement with island communities during the first consultation. The second consultation provided another opportunity for comments on this approach. This document has been updated following the analysis of the second public consultation responses.
40. It is important to stress that the CEWRM is a strategic high-level document. Subsequent stages to develop its interventions individually will be required to clarify the relevant policy detail to implement the commitments outlined.
41. This updated screening assessment identifies priorities for further analysis as well as areas where additional evidence-gathering is required as the detailed design of each relevant measure is developed. Detailed ICIA's will also provide opportunities for island communities, agencies, and businesses to highlight concerns, help identify appropriate mitigations, or help maximise the benefits from any associated policies in future.
42. Following the initial workshops, desktop research and screening process, several key issues were identified and were highlighted. Previous versions of

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<sup>29</sup> [Circular Economy \(Scotland\) Bill](#), 2024.

<sup>30</sup> [Circular Economy Bill: island communities impact assessment](#), Scottish Government, 2024.

this ICIA identified four ways in which island communities may be impacted differently to other parts of Scotland if implementing the interventions. These were:

- Transport
- Availability of disposal options and/or infrastructure
- Availability of products and services
- Employment and skills.

43. An initial high-level assessment of potential impacts was included and tested in both public consultations. This allowed us to seek the views of island communities to ensure that we have, as far as possible, captured all potential impacts of the CEWRM interventions.

## Key findings

44. Following the analysis of the second public consultation for the CEWRM, this ICIA has been updated. The high-level assessment was updated and includes two additional areas for consideration (amendments in **bold**):

- Transport
- Availability **and access to** disposal options and/or infrastructure
- Availability **and access to** products and services
- Employment and skills.
- **Constraints regarding public service design**
- **Disproportionate costs/cost of living implications**

45. The consultation respondents broadly agreed with the list set out in the first consultation document, while highlighting infrastructure as an additional issue for consideration. In the second consultation analysis, issues around local service design and additional costs for implementation of interventions were highlighted, while concerns regarding lack of access to and/or capacity of local infrastructure were reiterated.

46. All of the areas for consideration will impact on each strategic aim to a greater or lesser extent. The sections below incorporate the most relevant issues linked to the six areas for consideration for each strategic aim. They also highlight specific interventions, deemed most likely to have relevance with regards to island specific issues, and set out early considerations for any subsequent impact assessment.

### A. Reduce and reuse

Responsible consumption, production and reuse:

47. Opportunities for increasing reuse to reduce consumption of goods and packaging may be different for island communities. As well as limitations as result of lower population density making collection services less efficient,

they often pay a higher price for deliveries and in certain circumstances additional sums for suitable packaging on items so that it can withstand complex transit arrangements.

48. Infrastructure requirements for smaller quantities of arisings coupled with a smaller market for reusable items may not offer the necessary economies of scale to ensure scheme or business viability. It is recognised that any reuse targets that are developed as a CEWRM intervention will require modelling work to understand island specific impacts and any support that may be required.
49. Equally, if CEWRM measures result in a reduction of waste being produced or if primary producers on islands can sell easily to the local community, then there are potentially more significant benefits on islands due to reduced waste and recycling costs or more effective localised business operations. This may be true regarding any measures to address the disposal of unsold consumer goods, product stewardship measures or promoting circular business models - and as such any future ICIA would be required to explore and understand impacts and benefits.
50. It is understood that island communities already experience a relative lack of choice in terms of access to goods and services when compared to other communities<sup>31</sup>. This is a result of fewer shops in the local area, and the higher cost of deliveries to more remote parts of Scotland<sup>32</sup>. This may be relevant here and should be considered where appropriate when interventions under this strategic aim are taken forward. This is particularly important where specific products have a direct charge attached to them, but alternatives are less readily available for island communities.
51. Interventions that create employment and develop skills in the repair or refurbishment of products could bring additional benefit to island communities where availability of jobs is variable<sup>33</sup>. However, in the development of these measures, consideration should be given to whether opportunities may be more limited compared with other communities given the likely scale of potential operations. For example, this was considered as part of the banning of the sale and supply of single-use vapes.
52. Measures addressing environmental charges for problem products have the potential to have a different impact in islands communities. However, issues are only made clear when interventions are developed, and products are identified and assessed. At this later stage of policy development, as with the recent consultation regarding a single-use disposable beverage cups charge, policy-specific ICIA's should be produced. It is worth noting that the interim

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<sup>31</sup> [Developing Scotland's Circular economy – proposals for legislation: analysis of responses](#), Scottish Government, 2020.

<sup>32</sup> [Fairer Deliveries for All: an action plan](#), Scottish Government, 2018.

<sup>33</sup> [National Islands Plan Survey: final report](#), Scottish Government, 2021.

ICIA for a single-use disposable beverage cup charge did not identify significantly different impacts for island communities<sup>34</sup>.

Reduce food waste:

53. There is potential for redistribution of food to be more challenging in an island setting. The Scottish Government's six-fold urban rural classification (2016) classifies the islands as mainly remote rural, with remote small towns (see Figure 1)<sup>35</sup>. Those living in isolated rural areas have been found to be more vulnerable to food poverty,<sup>36</sup> and the cost of living is generally higher in island communities.<sup>37</sup>

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<sup>34</sup> [Single-Use Disposable Beverage Cups Charge: Island Communities Impact Assessment Report: Pre-Consultation Interim Report](#), Scottish Government, 2024.

<sup>35</sup> [Scottish Government urban rural classification 2016](#), Scottish Government, 2018.

<sup>36</sup> [The nature and extent of food poverty/insecurity in Scotland](#), Douglas et al, NHS Health Scotland, 2015.

<sup>37</sup> [A minimum income standard for remote and rural Scotland](#), HIE, 2013.

# Scottish Government Urban Rural Classification 2016

## 6-fold Classification

- 1 - Large Urban Areas
- 2 - Other Urban Areas
- 3 - Accessible Small Towns
- 4 - Remote Small Towns
- 5 - Accessible Rural
- 6 - Remote Rural

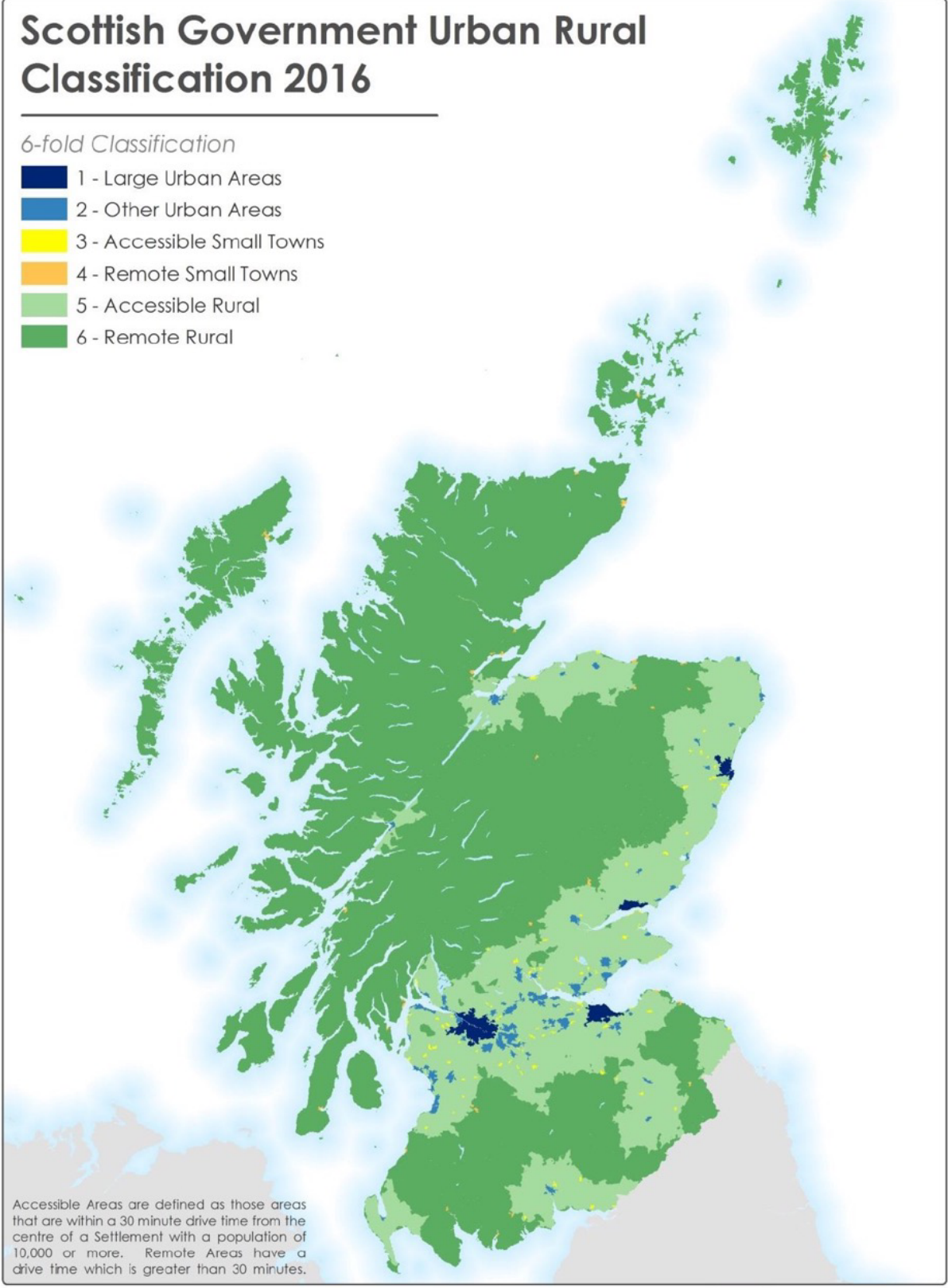


Figure 1: [Overview - Scottish Government Urban Rural Classification 2016 - gov.scot](https://www.gov.scot), The Scottish Government six-fold urban rural classification, 2016. Source: Scottish Government urban rural classification 2016

54. Previous research has identified that remoteness can be a challenge both for businesses with surplus food to redistribute, and for community organisations trying to access surplus food, due to the distances involved<sup>38</sup>. Despite this, there are currently a range of redistribution mechanisms in place in island communities. These range from involvement with large-scale organisations such as FareShare<sup>39</sup>, who distribute food to charitable organisations, including some in the islands, to locally focused community initiatives such as community fridges and food share schemes.
55. For island businesses with surplus food, the key issue will be whether there are organisations that could make use of the food locally. This may be a challenge particularly in smaller island communities. However, there are examples of local opportunities for redistribution in remote communities in the form of community fridges and community pantries in smaller communities<sup>40</sup>  
<sup>41</sup>.
56. The introduction of mandatory reporting of food waste and surplus requirements placed on businesses would likely apply to businesses across Scotland, and so would not be an island-specific issue. However, island businesses may need to make more changes to their operations than those elsewhere to report on food waste and surplus, because they are currently exempt from segregated food waste collections under the rural exemption of the Waste (Scotland) Regulations<sup>42</sup>. Businesses would therefore need to implement a system for measuring their food waste, for example via representative sampling. However, this will apply to businesses in other parts of the country covered by the rural exemption, so is not unique to an island setting. Mandatory reporting and any changes to the existing rural food waste exemption would be subject to an ICIA when being developed with stakeholders and as any secondary legislation is designed and implemented.

Embed circular construction practices:

57. Consideration should be given to the availability and affordability of transport which may lead to higher costs of construction on islands. Island transport logistics, and economies of scale will also have an impact on the viability and accessibility of regional reuse hubs for construction material and assets – this will require detailed analysis in intervention research and development. The potential for building refurbishment may also be restricted by island logistics and would necessitate further investigation and analysis as part of intervention development.
58. In addition, island communities may have potential issues with regards to supply chain and skills, with more limited access to sustainable construction products and services, reduced ability to follow demolition, screen, reprocessing and reuse of the resulting materials, and more limited availability and supply of workers. This was highlighted specifically in the Heat in

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<sup>38</sup> Unpublished Zero Waste Scotland research.

<sup>39</sup> [FareShare | Fighting hunger, tackling food waste in the UK.](#)

<sup>40</sup> [Community Fridges](#), Zero Waste Scotland, 2023.

<sup>41</sup> [Orkney's First Community Fridge](#), The Orkney News, 2021.

<sup>42</sup> [The Waste \(Scotland\) Regulations 2012.](#)



Buildings Strategy ICIA<sup>43</sup> but may impact other supply chains and skills in the construction sector. However, measures that promote circular construction practices could bring benefit to island communities in the form of potential for unique business approaches and possible skills development and job creation.

## **B. Modernise recycling**

Modernise household recycling and reuse services, improving and optimising performance:

59. Work undertaken for previous screening assessments under the Islands (Scotland) Act has identified that island authorities often face higher costs per capita in collecting, transporting and disposing of waste and recycling<sup>44</sup>. This is, in part, due to the rural nature of collections meaning they are less efficient because of factors such as longer distances, ferry journeys, inaccessible properties and low payloads. The Scottish Government Urban / Rural Classification,<sup>45</sup> highlights that the majority of the island authorities have high proportions of their populations in very remote small towns and rural areas. Some islands do not have a kerbside recycling service at present for this reason. Additional costs are incurred as waste and recycling must often be transported off island for processing due to the limited number of operational landfill sites and other disposal facilities located on islands.
60. People living in island communities may face additional barriers to responsibly disposing of and recycling their waste due to the lack of facilities – this includes waste from a number of sources, including households, commercial properties and construction and demolition sites. Smaller local authorities, with less waste to market, may have greater difficulty negotiating with the private sector to invest in and establish new facilities. It is also more difficult for island communities to work with neighbouring authorities and to share costs of these developments through waste partnerships.
61. Some waste partnerships have been successfully developed by smaller authorities particularly for treatment and disposal in mainland Scotland and in the rest of the UK. For example, Orkney Islands Council's residual waste is shipped to Shetland and constitutes a significant percentage of the feedstock required for the council owned and operated Energy from Waste (EfW) facility in Lerwick.
62. The pooling of residual waste and recycling tonnages to create economies of scale and support viable operational facilities is easier on the Scottish mainland. The complexities of Island waste collection logistics have been set out in the recently published EPR in Scottish Highlands and Islands - Summary Report<sup>46</sup>.

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<sup>43</sup> [Heat in buildings strategy: island communities impact assessment](#), Scottish Government, 2021.

<sup>44</sup> [Reforming the UK packaging producer responsibility system, Partial island communities screening assessment](#), Scottish Government, 2021.

<sup>45</sup> [Scottish Government Urban Rural Classification 2016](#), Scottish Government, 2018.

<sup>46</sup> [EPR in Scottish Highlands and Islands - Summary Report](#), Zero Waste Scotland, 2024.



63. When developing interventions that will address issues with household recycling, such as local performance targets, reviewing waste and recycling service charges, or an updated statutory Code of Practice, it will be essential that the design processes account for island communities and to ensure equity in access to services across all areas – with options appraisals undertaken for adopting alternative high performance collection systems if required. This will be possible as these interventions are developed and will require focused ICIA's which should include the differing impacts for different island communities<sup>47</sup>, how changes in waste produced may be impacted by transportation issues such as cost, but also disruption of ferry services due to high numbers of tourists or poor weather for example. Any co-design processes will also necessarily include representation from island communities.

64. The Return and Recycle Orkney pilot initiative is an example of how issues specific to island communities can be understood when implementing policies relating to household recycling<sup>48</sup>. It was set up to gather information on the use of reverse vending machines on an island location, to understand location-specific complexities, provide insights to inform the development of a deposit return scheme in Scottish island locations and provide operational insight to stakeholders involved in the logistics and day-to-day operations. It also assisted with general learning regarding the operation of a Voluntary Return Point, and wider operational and logistical learning.

Support commercial organisations in Scotland to reduce waste and maximise recycling:

65. It is a common theme of ICIA's that there are unique challenges for island communities regarding the availability and affordability of transport – and the lack of economies of scale and competition<sup>49 50 51</sup>. There are higher costs of transportation and less efficient logistics (e.g. payloads in vehicles) when covering a low-density population often covering multiple islands. This may make it harder for commercial organisations on islands to distribute their resources and collect recycling.

66. While market measure actions may be more limited due to the costs, infrastructure, distance travelled and feasibility on islands, consideration should be given to the challenges island businesses face during the development of measures as well as the unique opportunities and service set-ups that might benefit island communities. Measures to improve commercial waste service provisions can explore these issues in greater detail, for example via co-design with island-based businesses and commercial

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<sup>47</sup> [The National Islands Plan survey](#), Scottish Government, 2021.

<sup>48</sup> [Orkney to pilot Scotland-wide deposit return scheme](#), Orkney Islands Council, 2021.

<sup>49</sup> [Deposit return scheme for Scotland: islands communities impact assessment](#), Scottish Government, 2020.

<sup>50</sup> [Circular Economy \(Scotland\) Bill Islands Communities Screening Assessment](#), Scottish Government, 2020.

<sup>51</sup> [Single-Use Disposable Beverage Cups Charge: Island Communities Impact Assessment Report: Pre-Consultation Interim Report](#), Scottish Government, 2024.

organisations, and commercial waste service providers, and assess any disproportionate impact on island communities.

67. Interventions within this objective to undertake a national waste composition analysis from commercial premises and review commercial compliance will also serve to highlight and understand barriers and challenges for island communities in reducing waste arising and improving recycling.

### **C. Decarbonise disposal**

68. Impacts associated with costs of disposal are likely to vary between islands. Some islands have local access to a landfill or other residual waste treatment facility, while all other waste must often be transported off island for processing - often by ferry. This limits the facilities that are available to island communities as is shown by SEPA's Landfill Sector Plan<sup>52</sup> which identifies the locations of operational landfill sites in Scotland ([see figure 2 below](#)). The complexities of Island waste disposal logistics have been set out in the recently published EPR in Scottish Highlands and Islands - Summary Report<sup>53</sup>.

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<sup>52</sup> [Landfill Sector Plan](#), SEPA, 2018.

<sup>53</sup> [EPR in Scottish Highlands and Islands - Summary Report](#), Zero Waste Scotland, 2024.

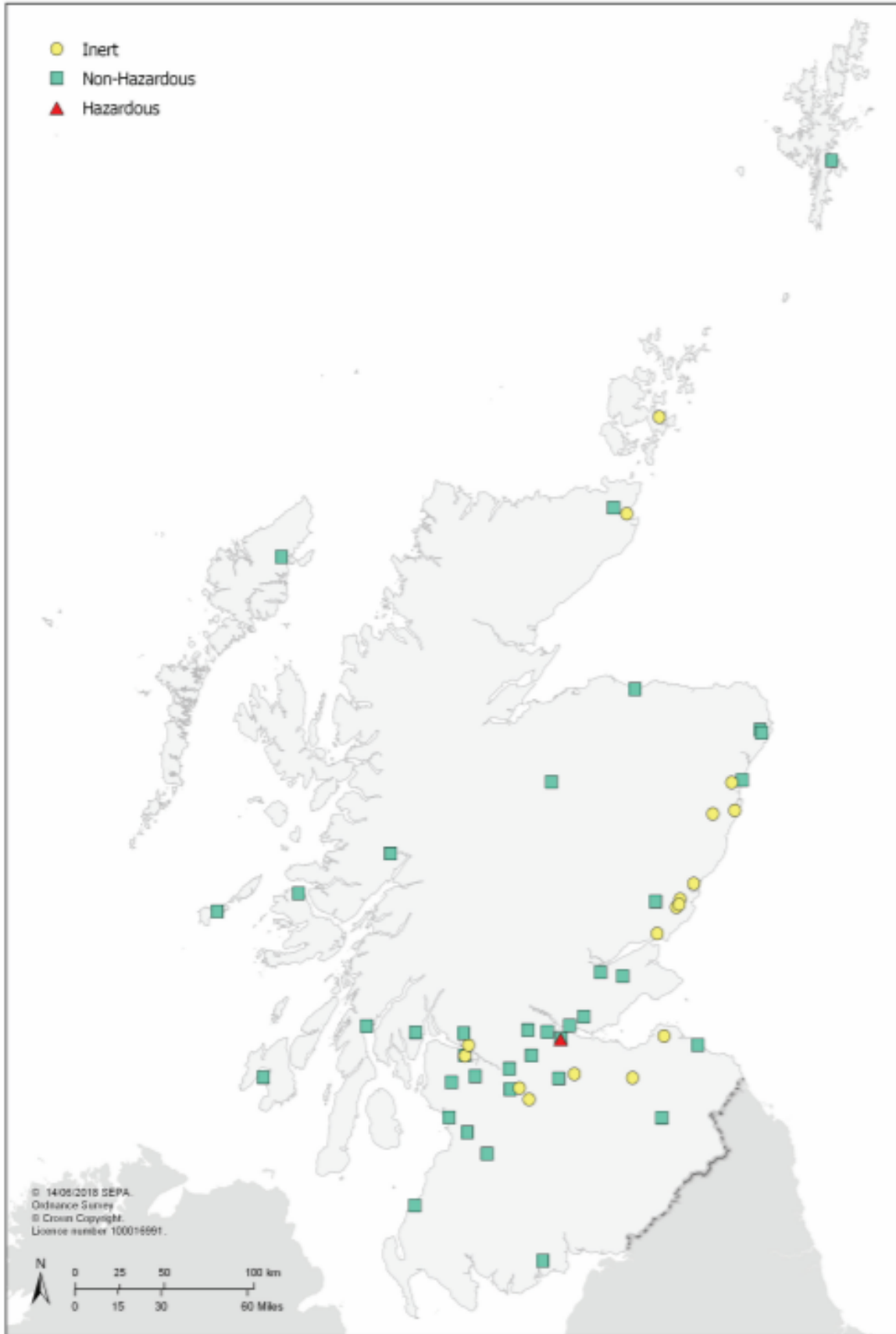


Figure 2: [Landfill sector plan | Scottish Environment Protection Agency \(SEPA\)](#)  
Operational landfill sites in Scotland

69. A ban on biodegradable municipal waste going to landfill from 31 December 2025<sup>54</sup>, will require support for local authorities to prepare and secure contracts that comply with the landfill ban, including island authorities. Similarly, islands authorities will require assistance to follow the findings of the independent review of incineration<sup>55</sup>. The report stated that in terms of managing residual waste, incineration was currently preferable to landfill - noting that it is particularly problematic for some of the more remote or rural areas of Scotland to gain access to these facilities. It also made clear recommendations around capacity and decarbonisation of energy from waste.
70. Increased recycling rates or changes to segregation of waste, potentially as a result of the new Residual Waste Plan to 2045 (CEWRM priority action), may result in a different amount of space required on ferries and more complex disposal logistics. This impacts the costs associated with transport, particularly when multiple ferry journeys are required before waste arrives at its destination.
71. More limited options for disposal routes on islands has resulted in some communities taking decisions that may require upfront investment but ultimately limit additional costs - for example creation of energy from waste facilities on Shetland. This investment was also highly successful in diversion from landfill while providing heat to a local energy network.
72. Implementing measures further up the waste hierarchy to divert waste away from landfill, and energy from waste, may face specific challenges due to the operational viability of existing facilities. Also increased transport costs and complex logistics – for example, for some materials, there are limited times that they are allowed on the ferries due to odour (or perceived odour) affecting other passengers. However, benefits can also be seen in terms of new income streams for high value and clean recyclable material or reduced landfill operation costs - or delaying the need to build new landfill cells.
73. The impact of the inclusion of energy from waste in the UK Emissions Trading Scheme on island local authorities is also recognised as potentially having a disproportionate effect owing to disposal costs already being higher than for most mainland counterparts. However, there is also potential in these areas to improve recycling capture and increase income from recycling streams when diverting high carbon material away from incineration.
74. Transportation logistics can be particularly challenging for difficult to recycle materials such as Waste Electrical and Electronic Equipment (WEEE) collections, end-of-life vehicles and construction materials. Recycling of farm plastics, for example, has two voluntary collection schemes and several waste collectors that will collect this material for processing; however, storage, preparation for transportation, potentially low value of the material and high shipping costs can be prohibitively expensive in certain cases.

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<sup>54</sup> [Biodegradable municipal waste landfill ban](#), SEPA, 2024.

<sup>55</sup> [Stop, Sort, Burn, Bury - incineration in the waste hierarchy: independent review](#), Scottish Government, 2022.

## **D. Strengthen the circular economy**

75. Islands face specific challenges that could make circular economy targets more challenging to reach. For example, reliance on types of transportation, importing goods and materials – as well as recycling targets.
76. This strategic aim incorporates skills, education and training and will be an avenue to highlight and create opportunities in island communities in the form of new jobs within the circular economy, underpinned by just transition principles. There is potential to stimulate local job markets and local economies in island communities as CEWRM interventions are developed and implemented.
77. Procurement costs for island communities differ from the mainland, and costs can be higher purchasing equivalent products and services for a variety of reasons. Circular procurement practices have the potential to offer positive impacts in islands communities by offering a route to affordable, potentially refurbished high quality products. There may even be potential for procurement practices to encourage the growth of local circular solutions such as refurbishment and repair within island communities.

## **Gathering data for future analysis**

78. Some data already exists in relation to the key potential impacts identified during the workshop and consultation responses, and these sources have been outlined below. However, at this stage only overarching issues have been identified to assist future evidence gathering processes as interventions are developed.
79. It is intended that further detailed assessment of the impacts and associated evidence is gathered at the point when the specific details of each intervention are developed and progressed. Further research should be considered to understand the gaps in data that exist as and when interventions are developed in future.
  - a. Transport

The Scottish National Islands Plan Survey<sup>56</sup> highlights that views on the reliability and availability of ferries vary between ages groups and between island subregions<sup>3</sup>.
  - b. Availability of disposal options and/or infrastructure

Waste and recycling data is available from island communities via their local authorities and is reported to SEPA on an annual basis using Waste Data Flow<sup>57</sup>. This data covers household waste and recycling collections,

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<sup>56</sup> [National Islands Plan Survey statistics](#), Scottish Government, 2022.

<sup>57</sup> [Waste Data](#), SEPA, 2024.

treatment, and disposal. This data shows that the majority of island authorities have recycling rates that are below the Scottish average, in some cases by a substantial margin<sup>58</sup> and kerbside recycling services are not universal in island communities.

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

Shetland, Comhairle nan Eilean Siar and Orkney local authorities can provide specific waste management data relating to their island communities and this should be used when it comes to the design of specific interventions.

Highlands, Argyll & Bute and North Ayrshire local authorities may be less likely to be able to disaggregate data from island communities. This might also be the case for waste management companies, where they operate on islands. Efforts should be made to collect data specific to these island communities to better inform the detailed development of relevant measures.

The Scottish National Islands Plan Survey 2020<sup>59</sup> highlights the variability of views across the Scottish Islands on access to recycling household waste and donating items for reuse. This should be considered and explored further during the development of related measures.

In research undertaken previously by Zero Waste Scotland<sup>60</sup> to better understand the costs of waste management, collection, and disposal in Scotland, all island authorities, with the exception of North Ayrshire, were included in the rural inaccessible category. North Ayrshire was included in the rural accessible classification because most of the population lives on the mainland, apart from Arran. The research indicated that for the rural inaccessible category, the annual cost per household of providing waste collections is substantially higher than the average cost in Scotland. Although these figures should be treated with caution as they are based on one year's data and calculated using several assumptions, they do indicate that there is an island premium in the cost to local authorities of managing household waste.

#### c. Availability and access to products and services

It is understood through research gathered for the Fairer parcel deliveries: action plan<sup>61</sup> that costs for delivery discriminates against those living in rural and remote areas, such as the islands. This can prevent island communities taking advantage of the digital economy and the products and services it provides. It is also noted that this can be a barrier to small businesses, which further limits the availability for individuals as well as the economic potential of those locations.

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<sup>58</sup> [Scottish Household waste – summary data 2021](#), SEPA, 2022.

<sup>59</sup> [National Islands Plan Survey 2020, Final Report](#), The Scottish Government, 2021

<sup>60</sup> Zero Waste Scotland, desk-based research

<sup>61</sup> [Fairer parcel deliveries: action plan](#), Scottish Government, 2018.

The Islands Green Recovery Programme Refill Fund was part of the Scottish Government's £2 million programme to inspire locally led green projects on islands to recover from the coronavirus pandemic. The fund awarded over £250,000 to 20 organisations and businesses in island communities to gain funding to develop packaging-free shopping opportunities in the grocery retail sector. Findings and experience from this initiative will be important to consider as specific interventions in the CEWRM are developed<sup>62 63 64</sup>.

d. Employment and skills

The National Islands Plan survey<sup>65</sup> provides an understanding of availability of job and training opportunities across the different island sub-regions. Further knowledge would be needed to understand how this would relate to any opportunities and challenges resulting from measures that affect employment and skills, and how these would differ from those experienced by communities elsewhere in Scotland.

e. Constraints regarding public service design

Research exists into place-based policy making in rural Scotland including service delivery challenges in remote communities including island communities<sup>66</sup>. For example, utilising innovative practices and collaboration to overcome challenges and find opportunities in these areas<sup>67</sup>. The co-design approach for household recycling will aim to ensure these limitations are accounted for and solutions made in collaboration with islands authorities to ensure future services perform as highly as is possible in the context of geographical variations.

f. Disproportionate costs/cost of living implications

Those living in remote rural areas of Scotland experience higher costs to achieve the same standard of living when compared to those in urban areas. This may mean that those on an equivalent income in a remote rural area, including islands, may be more likely to face financial difficulty<sup>68</sup>.

Available evidence also identifies the existence of a 'poverty premium', where low-income consumers tend to overpay for goods and services. This can result in a lack of access to lower priced, better quality and more durable goods. These issues may also impact those living in Scottish island communities. In the case of food, the poverty premium is a consequence of the lack of access to large supermarkets to get multi-buy deals or of higher delivery charges for small shopping baskets.

Respondents to the second consultation highlighted the need to be wary of potential socio-economic impact of some proposals on island communities -

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<sup>62</sup> [Islands Green Recovery Programme: Sustainable Transport Fund project summaries](#), Energy Savings Trust, 2021.

<sup>63</sup> [Islands Green Recovery Programme How communities are 'greening' their development projects](#), HIE.

<sup>64</sup> [Islands Green Recovery Programme Summary](#), Inspiring Scotland.

<sup>65</sup> [National Islands Plan Survey: final report](#), Scottish Government, 2021.

<sup>66</sup> [SEFARI Place-based policy and its implications for policy and service delivery](#), SEFARI.

<sup>67</sup> [Place-based policy and its implications for policy and service delivery](#), SRUC, 2017.

<sup>68</sup> [A minimum income standard for remote and rural Scotland](#), HIE, 2013.



given the additional costs and challenges relating to circularity and waste disposal in these areas.

### **Recommendation and conclusions**

80. On present evidence, we do not believe that the publication of the CEWRM itself will disproportionately impact island communities. However, it is likely that a significant number of the individual measures may have a range of both negative and positive impacts across island populations.
81. It is recommended that as individual interventions and their actions are being developed, they are subject to the impact assessment process ranging from screening to full assessments as required.
82. It is recommended that stakeholder engagement with relevant representative groups and those with lived experience is undertaken as measures are developed.
83. It is recommended that findings and evidence gathered from this and other related ICIA's are maintained and updated as necessary to support future related CEWRM action impact assessments - as per the single-use vapes and cups interventions outlined earlier.
84. It is recommended that where appropriate, CEWRM-related research should continue to take cognisance of gathering evidence of potential impacts to island communities.
85. The Scottish Government will consider an appropriate and proportionate monitoring approach to the CEWRM outputs. This will include the overarching Circular Economy Monitoring Indicator Framework Scottish Government is developing, alongside monitoring approaches developed for each individual intervention where appropriate.
86. Progress of the CEWRM will also be tracked by the relevant Scottish Government Programme Board to ensure measures are being implemented in line with the timeframes provided in the CEWRM.
87. **A full Islands Community Impact Assessment is NOT required at this time.**

Screening ICIA completed by (name)	Jon Havens
Position	Team leader, Circular Economy Strategy

Signature and date	J Havens, 13 January 2025
ICIA authorised by (we recommend DD level)	David McPhee
Position	Deputy Director, Circular Economy Division
Signature and date	D McPhee, 13 January 2025

## Appendix 1

The following section describes the four Route Map strategic aims, along with identified priority actions (in **bold**) and further actions (bullet points).

### Reduce and reuse

Reducing and reusing waste are at the top of the waste hierarchy and central to changing our relationship with materials and products. Building an economic system that moves away from being based on items that are designed to be disposable will bring significant environmental benefits.

The interventions within this strategic aim are grouped under three objectives:

- Responsible consumption, production and reuse
- Reduce food waste
- Embed circular construction practices

Responsible consumption, production and reuse

#### **Publish a Product Stewardship Plan to set out how we will tackle the environmental impact of priority products by 2025/26**

- Develop further measures to tackle consumption of problematic single-use items and promote uptake of reusable alternatives (including consideration of environmental charging), prioritising action on single-use drinks cups
- Develop measures to address the disposal of unsold consumer goods
- Develop measures to improve the reuse experience for consumers
- Deliver behaviour change-based approaches focussed on sustainable consumption, aligned to Let's Do Net Zero communications
- Identify ways to expand business models that prolong product lifespan
- Investigate further steps to promote business-business reuse platforms

Reduce food waste

#### **Develop an intervention plan to guide long-term work on household food waste reduction behaviour change by 2026/27**

#### **Develop with stakeholders effective options to implement mandatory reporting for food waste and surplus by businesses from 2025/26**

- Strengthen data and evidence
- Review the rural exemption for food waste recycling, as part of recycling co-design process
- Deliver enhanced support for businesses

Embed circular construction practices

## **Support the development of a model for regional Scottish hubs and networks for the reuse of construction materials and assets from 2025-2027**

- Develop new and promote existing best practice standards in circular practices within the construction sector, and assess the options for both voluntary and mandatory compliance
- Investigate and promote options to incentivise and build capacity for the refurbishment of buildings
- Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill
- Review opportunities to accelerate adoption of climate change and circular economy focussed purchasing in construction
- Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices

## **Modernise recycling**

Recycling helps to conserve our natural resources, keep valuable materials flowing through our economy and reduce the amount of waste sent to landfill. We want Scotland to become a world leader in recycling, where recycling and reuse services are easy to use and accessible to all, and support and encourage positive choices. We want a high-performing recycling system that includes: modernised recycling services for households and businesses across Scotland; optimises the performance of collection services; and can recycle most waste types to maximise diversion of waste from disposal. Increasing the amount of materials recycled and increasing the proportion of these recycled in Scotland will deliver carbon reductions, reduce the environmental impacts associated with extracting new raw materials, and create a range of important economic opportunities to reprocess and reuse materials here in Scotland.

The interventions within this strategic aim are grouped under two objectives:

- Household recycling
- Commercial recycling

### Household recycling

#### **Facilitate a co-design process for high quality, high performing household recycling and reuse services, 2024-2026**

- Introduce a statutory Code of Practice for household waste services
- Introduce statutory recycling and reuse local performance targets for household waste services (from 2030)
- Undertake a consultation to explore kerbside collection of textiles
- Strengthen the Householder's duty of care obligation in relation to household waste
- Give local authorities more tools to support household recycling and reduce contamination
- Undertake a review of waste and recycling service charging
- Review the monitoring and reporting framework for local authority waste services

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

Commercial recycling

### **Review of compliance with commercial recycling requirements, 2026**

### **Co-design measures to improve commercial waste service provisions, commencing by 2030**

- Conduct a national compositional study of waste from commercial premises

## **Decarbonise disposal**

The production and management of waste results in environmental impacts and represents missed economic opportunities for these materials. That is why our focus in this Route Map is to prevent materials from becoming waste in the first place. As we accelerate our move to a circular economy, we will produce less waste. We want to ensure that materials that cannot be avoided, reused, or recycled are managed in a way that minimises environmental and climate impacts, encourages management of materials further up the waste hierarchy, and minimises broader societal impacts.

### **Develop a Residual Waste Plan to 2045, 2027**

### **Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector, 2027**

- Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal
- Review and target materials currently landfilled to identify and drive alternative management routes
- Facilitate the co-production of guidelines for effective community engagement
- Increase the capture of landfill gas

## **Strengthen the circular economy**

Delivering a circular economy requires sustained transformational system change, and a range of actions that are both complementary and coordinated to drive sustainable management of our resources. If we are to maximise the opportunities that a circular economy brings to Scotland, we must maintain a strategic approach to its delivery, ensuring the right structures and support are in place to enable action.

### **Develop a circular economy strategy every five years, first one in 2026**

### **Set new circular economy targets by 2027**

- Review and refresh Scotland's Waste Data Strategy's action plan
- Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities
- Develop public procurement opportunities to reduce the environmental impact of public spending, including scoping new legislative circular economy requirements

for contracting authorities under section 82 and 82A of the Climate Change (Scotland) Act 2009

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



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