

Safeguarding Scotland's Resources – A Programme for the Efficient Use of Our Materials: Analysis of Consultation Responses

Linda Nicholson, The Research Shop

In 2012 the Scottish Government published a consultation, *Safeguarding Scotland's Resources – A Programme for the Efficient Use of Our Materials*, to seek views on a range of proposals to reduce waste and promote resource efficiency. The consultation is in line with the European Waste Framework Directive for every member of the European Union to produce a waste prevention programme by the end of 2013. Safeguarding Scotland's Resources proposes an overall target of a 5% reduction in all waste by 2015, and a longer-term vision of a 15% reduction in all waste by 2025. In total, 693 responses to the consultation were received (594 of which resulted from internet campaigns). Ninety-nine "standard" responses to the consultation were submitted, 75 of these (76%) by organisations, and 24 (24%) by individuals. Two separate internet campaigns were organised on aspects of the consultation which attracted 490 (WWF) and 104 (Marine Conservation Society) campaign responses respectively.

Main Findings

- All of the respondents who expressed a view supported the proposal for an integrated Business Resource Efficiency service to replace the business and public sector energy and resource efficiency advice currently delivered through Carbon Trust, Energy Saving Trust and Zero Waste Scotland (ZWS). The main benefit of the new service was perceived to be a more streamlined, 'one-stop shop' approach, which would be easier to access than the present arrangements.
- Ninety-one per cent of those who provided a view explicitly agreed or partially agreed with the actions identified in the consultation document to support the sustainable design of products. In particular, the proposal to include design in higher and further education provision attracted most cross-sector support, with long-term gains identified.
- Whilst 44% of those who commented explicitly agreed or partially agreed with the principle of amending the existing Producer Responsibility Regulations to enable separate identification of packaging waste arising in Scotland there was also significant opposition (49% of those who commented) to this proposal. A main concern was that the additional burden and costs which most respondents associated with this proposal may not be offset by the potential benefits.
- The majority (80%) of those commenting explicitly agreed or partially agreed that the Scottish Government work with ZWS to increase the supply and demand for quality reusable items through a series of actions. The theme of quality of reused items and ensuring safety standards featured prominently in responses. Revolve was cited as a network associated with assurance of quality.
- Ninety-four per cent of all respondents who provided a view in campaign responses and standard responses agreed outright with the proposal to introduce a charge for carrier bags. Of the 71 standard responses which addressed the topic, 60% agreed or partially agreed with the proposal, whereas 37% explicitly disagreed.

Background

In 2010 the Scottish Government launched Scotland's Zero Waste Plan¹ which promoted the vision of a Scotland where we waste as little as possible, recognising that every item and material used is a resource which has a value. The Waste (Scotland) Regulations 2012 set a clear path for this to happen. Building further upon these developments, the Scottish Government published a consultation, *Safeguarding Scotland's Resources – A Programme for the Efficient Use of Our Materials*, to seek views on a range of proposals to reduce waste and promote resource efficiency.

The consultation was grounded in the principles of using materials efficiently, avoiding waste and reusing items, and contained a programme of proposals to drive progress towards furthering these principles in the broad areas of:

- working with businesses
- product design and packaging
- reuse
- influencing behaviours.

The consultation is in line with the European Waste Framework Directive for every member of the European Union to produce a waste prevention programme by the end of 2013. *Safeguarding Scotland's Resources* proposes an overall target of a 5% reduction in all waste by 2015, and a longer-term vision of a 15% reduction in all waste by 2025. The proposals in the consultation go wider than a waste strategy, however, and are designed to contribute to improving Scotland's economy (through savings to businesses and the creation of new business and market opportunities); protecting the environment; reducing carbon impact; conserving resources; and helping to deliver behaviour change.

Views were sought from stakeholders including businesses and business networks, local authorities and other public bodies, non-Government organisations (NGOs) and others, with specific proposals relating to a variety of areas including the construction industry, waste management industry, manufacturing and retail. Two stakeholder events were held in Edinburgh and Glasgow with attendees including representatives from businesses and business networks, local authorities and the Chartered Institution of Waste Management. A written consultation was also published with views requested by 28th September 2012. The findings reported here relate to the written submissions only.

¹ <http://www.scotland.gov.uk/Publications/2010/06/08092645/0>

Overview of respondents

Ninety-nine standard responses to the consultation were submitted using the response form provided or in the form of a letter/email. These responses have been made publicly available on the Scottish Government website² unless the respondent has specifically requested otherwise. Seventy-five responses (76% of the standard responses) were submitted by organisations, with 24 submissions (24% of standard responses) from individuals. Retailers comprised the largest organisation respondent group, submitting 15% of the standard responses received.

Two separate campaign responses were organised on aspects of the consultation which attracted 490 (WWF) and 104 (Marine Conservation Society) campaign responses respectively. The Marine Conservation Society campaign focused solely on the proposal to introduce a charge for carrier bags. The WWF campaign also addressed this issue, and in addition made comments regarding deposit return and the proposed headline targets.

Business resource efficiency

All of the respondents who provided a view supported the proposal for an integrated Business Resource Efficiency service to replace the business and public sector energy and resource efficiency advice currently delivered through Carbon Trust, Energy Saving Trust and Zero Waste Scotland (ZWS). The main benefit of the new service was perceived to be a more streamlined, 'one-stop shop' approach, which would be easier to access than the present arrangements. A recurring comment was that the service should focus initially on areas offering most savings for least input.

Although the consultation did not pose a specific question relating to voluntary agreements with businesses, some respondents provided a view on these, with the majority considering that these could usefully be developed further by the Scottish Government.

There was much support expressed for the proposal that ZWS should develop a high-level Zero Waste Pledge system with a menu of actions open to companies of different sizes. The proposal was seen to offer benefits for companies largely in terms of showcasing their good intentions, commitment and 'green' credentials. A recurring recommendation was for the scope of the pledge to be widened to encompass 'resource efficiency' rather than focus solely on waste.

² The consultation non-confidential responses can be viewed at: <http://www.scotland.gov.uk/SSRresponses>

Seventy-two per cent of those who provided a view explicitly agreed or partially agreed with the principle of a new voluntary agreement with the construction sector, following on from 'Halving Waste to Landfill', encompassing the impact of design on both construction waste and materials. It was generally thought that committing to the agreement would bring indirect financial and competitive advantages to organisations. Several local authorities, amongst others, expressed concern that some small and medium sized enterprises (SMEs) in particular may not sign up to the agreement unless it is made mandatory.

Twenty-one of the 23 respondents who expressed a view were supportive of waste management companies signing up to a voluntary agreement to provide resource efficiency advice to their customers.

Products and packaging

Ninety-one per cent of those who provided a view explicitly agreed or partially agreed with the actions identified in the consultation document to support the sustainable design of products. In particular, the proposal to include design in higher and further education provision attracted most cross-sector support, with long term gains identified.

Whilst 44% of those who commented explicitly agreed or partially agreed with the principle of amending the existing Producer Responsibility Regulations to enable separate identification of packaging waste arising in Scotland, there was also significant opposition (49% of those who commented) to this proposal. A main concern was that the additional burden and costs which most respondents associated with this proposal may not be offset by the potential benefits.

Although not included as a specific topic on which views were sought, several respondents alluded in their responses to the topic of deposit return and reverse vending schemes. The WWF campaign responses argued for the introduction of a nation-wide deposit return system. Whilst some other respondents argued that deposit return and reverse vending schemes are expensive to operate and inefficient compared with existing household recycling schemes, others welcomed future piloting of such schemes in Scotland.

The most common recommendations emerging from those who provided a view on the most effective approaches to make it easier for people to return Waste Electrical and Electronic Equipment (WEEE) for recycling and reuse were for increased, accessible collection provision supported by public awareness raising and education campaigns.

Reuse

The majority (80%) of those commenting explicitly agreed or partially agreed that the Scottish Government work with ZWS to increase the supply and demand for quality reusable items through a series of actions. The theme of quality of reused items and ensuring safety standards featured prominently in responses. Revolve was cited as a network associated with assurance of quality.

Another recurring theme was that whilst householders are becoming more accustomed to the concept of reuse, more work is required to raise awareness amongst businesses.

Overall, more respondents considered it impractical to collect separate data on the quantities of materials 'prepared for reuse' than those considering this practical. The main challenge identified was how to capture informal movement of reusable items, which often occurred online through auction sites.

Two-thirds (68%) of those providing a view considered that whatever the challenges, it would be useful to collect 'prepared for reuse' data.

Influencing behaviours

There was much support, largely from local authorities and manufacturers, for public campaigns to influence the behaviour of individuals and organisations to use material resources more efficiently. A prominent recommendation was for consistency in the message delivered in such campaigns, with suggestions made for one body to be made responsible for delivery.

There was explicit support from some respondents for a focus on reducing food waste; others provided support for delivery of messages through the Eco-Schools movement. The actions proposed regarding waste collection systems were specifically supported along with the proposals for promoting community action, and the emphasis on leading by example.

Ninety-four per cent of the overall responses (campaign and standard) addressing the proposal to introduce a charge for carrier bags agreed outright with the proposal. Amongst the standard responses received 60% of those who provided a view explicitly agreed or partially agreed, whereas 37% explicitly disagreed with the proposal. All of the 594 campaign responses supported the charge. The main focus of the two campaigns (WWF and Marine Conservation Society) was to support charging for carrier bags. The WWF campaign referred to introducing a plastic bag charge, whereas the Marine Conservation Society used the term 'single-use carrier bag levy'.

The main reasons given in support of the proposal were that charging has worked well previously and elsewhere; charging for carrier bags constitutes a powerful behaviour change message; and carrier bags contribute to pollution and litter. However, one recurring concern amongst supporters was that by placing too much emphasis on charging for carrier bags, other actions which may have more of an impact may be relegated.

The most common reasons provided by those opposed to the introduction of a charge for carrier bags were: consumers may buy other bags such as bin liners to compensate, resulting in more waste; the proposal may have little impact on resource efficiency; and the proposal is based on what some perceived to be the false premise of carrier bags as 'single use'.

It was commonly thought that should charging for carrier bags be introduced, all retailers should be included in the scheme which should encompass all single use/disposable carrier bags, regardless of material. There were mixed views on the minimum charge per bag with most (61% of those providing a view) supporting the suggested 5p charge, but others recommending higher charges ranging up to 20p per bag.

All but one of the respondents who provided a view supported the directing of net revenue from carrier bag charging to good causes. It was recommended that there is transparency in how much revenue is being directed to which good causes. Some respondents felt that retailers should be given leeway to decide where to direct the net revenue, and causes

other than environmental and resource efficiency organisations should be permitted.

A common view was to keep the reporting system as simple and minimal as possible. There were mixed views on the proposal for 'light touch' enforcement, with some respondents recommending a tighter approach.

Measuring progress

Whilst general support was provided by many respondents for the principle of overarching targets, some expressed reservation that those proposed based on waste volumes appeared to lack the wider context of, for example, general economic health, wider policy initiatives and the strategies of other countries. The balance of view was in favour of linking targets to GDP which was seen as providing context, being readily available and fitting with the agenda of economic growth.

Amongst the proposed indicators, the carbon impact of waste attracted most attention. Broad opinion was that the indicator would be very useful and important in measuring advances in both prevention and recycling.

The scale of ambition of the targets for waste reduction attracted commentary from some, with the WWF campaign in particular (490 respondents) recommending that the target for 2025 should be increased from 15% to 50% reduction in waste.

This document, along with full research report of the project, and further information about social and policy research commissioned and published on behalf of the Scottish Government, can be viewed on the Internet at: <http://www.scotland.gov.uk/socialresearch>. If you have any further queries about social research, please contact us at socialresearch@scotland.gsi.gov.uk or on 0131-244 2111.