

# DELIVERING SCOTLAND'S CIRCULAR ECONOMY: A ROUTE MAP

## A COMMON WEAL RESPONSE

### INTRODUCTION

This report is Common Weal's response to the Scottish Government's consultation on a routemap towards creating the Circular Economy that would be enabled by their current Circular Economy Bill (see also Common Weal's response to the consultation on that Bill). This consultation focuses largely on the management of waste within the Circular Economy and in particular on the role of improved waste recycling and in "responsible consumerism". This marks the fundamental limit and, indeed, mis-targeting of this proposed routemap. As explained in Common Weal's Common Home Plan – the world's first fully comprehensive, national-scale Green New Deal blueprint – consumerism itself is a major part of the problem that has resulted in the climate emergency and better waste management does not fix this. A true Circular economy should be based on the principles of demand reduction (more goods being leased and borrowed rather than purchased), Producer Responsibility (where the producers of goods are responsible for the entire lifecycle of their goods as well as the packaging, waste and pollution they create – even inadvertently or when waste is disposed of improperly) and a "Design for Zero" principle where goods are designed to fit within the Circular Economy and produce as little waste as possible and where waste, particularly packaging, is created, it can be easily re-used or composted.

The measures in this roadmap are often individually worthy of support though many of them are themselves insufficient – a single step forward where ten are needed – and the entire package of policy proposals is itself insufficient. While we certainly do not oppose many of the proposals in this consultation we do oppose the underlying premise of this roadmap as it will not lead to a Circular Economy even if every component part of it is implemented in full. We therefore call on the Scottish Government to scrap this plan, consider what a Circular Economy would look like if it was implemented in full and then redesign the roadmap so that that desired end goal is achieved. Once again, we suggest Common Weal's own Common Home Plan as the basis for an improved routemap.

## QUESTIONS

**1. To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use? Please provide evidence to support your answer if possible.**

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

We agree with sentiment and much of the logic behind the waste route map however the measures proposed are completely inadequate in terms of addressing the scale of the problem. Each one of them represents a positive forward step but the sum total of their effect will not result in Scotland becoming a waste-free, Circular Economy nation.

**2. Are there any further measures that you would like to see included in the Route Map to promote responsible consumption, production and re-use?**

Common Weal has published extensive work on the waste cycle within a Circular Economy as part of our 2019 Common Home Plan. We call for the Scottish Government to adopt its principles in full.

The most important of all of these principles is the adoption of full "Polluter Pays" and "Producer Responsibility" within the entire waste cycle. This effectively means that the producers (rather than consumers) of goods and packaging that becomes waste should be the ones to pay for its responsible processing and disposal until and unless such waste is eliminated through product design or rendered entirely safe and compostable. The Scottish Government has the power to support Local Authority taxation to enable this to take place.

The national reuse targets are another example of a worthy target hampered by refusal to accept the scale of the problem. Measures such as the Scottish Government's target to increase the number of Resource Libraries to 100 have been acknowledged in public by the Minister responsible as being far short of the number required to actively disrupt and replace wasteful consumer habits. Common Weal calls for the Scottish Government to fund Resource Libraries on a scale more akin to that seen in Book Libraries before they were decimated by budget cuts. Ideally, a target should be set that there should be at least one Resource Library adequate to local community needs within each "15-minute neighbourhood" in Scotland.

**3. To what extent do you agree with the measures proposed in this package to reduce food waste? Please provide evidence to support any identified opportunities and challenges associated with the measures in your answer if possible.**

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

We again point to the work done by Common Weal within our Common Home Plan on both Circular Economy and in Food as our strategy for waste reduction in this sector. We would particularly caution the Scottish Government from unduly blaming consumers and households for food waste where the root cause may instead be overly-long supply and logistics chains and in marketing campaigns particularly by larger supermarkets that encourage the purchasing of too much food (often as part of multi-buy promotions) or package food in volumes too large to easily use. Food wasted by consumers should still fall under the remit of Producer Responsibility and thus its processing (preferably via home and community-level bioreacting composters rather than landfill) should be paid for by those producers. Enabling consumers to purchase more goods by weight using reusable containers (rather than set volumes or weights wrapped in plastic “for freshness”) will better allow consumers to avoid creating waste in their food consumption. The ultimate goal should be that all food retailers move to a “Zero Packaging, Zero Waste” model that is already proving successful both in Scotland and in other European countries.

#### 4. Are there any further measures that you would like to see included in the Route Map to reduce food waste?

The route map makes claims about improving “sector leadership” but it is well known that the industry sector will only make a move that transfers the cost of waste from their customers back – properly – to themselves when forced to either by overwhelming public opinion or – much more expediently – by Government legislation, taxation and regulation. The Scottish Government should expand fully its role in this regard to the fully extend of current devolved powers

and should publish, now, its proposals for any remaining aspects of this strategy that currently lie outwith its devolved control but which would come either through independence or the expansion of the devolution settlement.

We should also as nation regard the tackling of food waste to be part of the strategy for tackling food security. Brexit and Covid have shown the limits of global supply chains. Will there ever be a full accounting of the tonnes of food wasted because of failures or border control or the seizing of the global “just in time” model? Scotland has its role to play in this both in terms of food imports and food exports. Greater localisation and seasonalisation of food supply will help reduce food waste both during times of unexpected crisis and in “normal” times.

#### 5. To what extent do you agree with the measures proposed in this package to improve recycling from households? Please provide evidence to support your answer if possible

Strongly agree

Agree

Neither agree or disagree

Disagree

> **Strongly disagree**

The question should never be to ask to what extent will the proposals improve the situation but should instead be to ask if they are sufficient to fully address the problems.

Recycling by households should be considered not as a success but as a first response to failure somewhere else in the Circular Economy. A household that is recycling a broken piece of electronics is doing so probably because they purchased a cheap, almost disposable electronic device instead of borrowing a high-quality, easily repairable device from their local Resource Library. A household that is recycling their plastic, single-use drinks bottle is doing so because they are not reusing a glass one or

returning it to deposit-return schemes.

In a properly managed Circular Economy, we should expect the volume of recycling by households to decrease, not increase.

Once again, Common Weal's Common Home Plan details what this Circular Economy should look like.

## 6. Are there any further measures that you would like to see included in the Route Map to improve recycling from households and incentivise positive behaviours?

Positive behaviour is only possible when positive choices can be made. In terms of volume of waste, the author already produces more "recycling" than landfillable waste. However, it is not within my control where that recycling goes (Bloomberg recently traced much of Tesco's new "soft plastic" recycling scheme back to a Polish incinerator) nor is it possible to easily "choose" options that result in less plastic due to lack of options in retail. Producers must be regulated and taxed into offering those positive choices to consumers in a way that make the current model prohibitive.

## 7. To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses? Please provide evidence to support your answer if possible.

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

Many of the proposals in this section are individually worth supporting but again are either flawed, incomplete or as a sum total will not fully

correct the problem of waste.

It is encouraging to see the Scottish Government admit the absence of data on the scale of commercial waste and to see that EPR will cover packaging but we remain concerned that the rates being charged to companies for their waste packaging will be set sufficient only to partially remunerate Local Authorities for the disposal of waste packaging but not higher enough to eliminate their production in the first place.

Once again, a Circular Economy should expect to see the volume of consumed materials drastically reduce as a whole – not that we merely increase recycling rates while also increasing consumerism in worship of "GDP Growth".

## 8. Are there any further measures that you would like to see included in the Route Map to improve waste recycling from commercial businesses?

With regards to flytipping, the data tracking measures are welcome but Producer Responsibility still applies here too. The manufacturers of identifiable waste that is fly-tipped should also contribute to the clean-up of the waste and costs associated with repairing the environment damaged by the fly-tipping. When goods are redesigned to fit into the Circular Economy then the company would no longer be at risk of being fined for contributing to fly-tipping.

This same principle should also be applied to other commercial litter – scenes in Edinburgh and other cities recently have shown what happens when the waste system is overwhelmed because commercial producers have no incentive to reduce litter that they cause. Companies like Litterati have shown almost in real time the sphere of influence that spreads from fast food companies in particular when they open new locations. Some of these companies successfully transitioned from plastic food wrappers to paper (though the plastic coatings of "paper" cups remain bizarrely exempt from current Scottish Government proposals to regulate single-use cups) and should once again be called to step up their responsibilities to transition fully into the

Circular Economy.

**9. To what extent do you agree with the measures proposed in this package to embed circular construction practices? Please provide evidence to support your answer if possible.**

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

The Scottish Government should change construction regulations immediately to state that all new constructions and substantial refits or expansions should be built to zero-emission, passive-efficiency quality and to full Circular Economy standards with Producer Responsibility embedded throughout the construction process. The “design for deconstruction” principle quoted in the consultation document and inspired by the Climate Assembly should be adopted.

Given the expected lifespan of buildings (which should never be less than 100 years – especially for public buildings), it would be unreasonable to assume that a construction company today would still be around to dismantle a Circular building responsibly. We should therefore expect especially volume build construction companies to pay a bond sufficient to cover those eventual costs at the time of construction.

With regards to soil management in construction – the principle problem here is framing the soil as “waste” rather than the valuable and undervalued resource that it is. It is encouraging to see the Scottish Government consider this as part of proposals.

**10. Are there any further measures that you would like to see included in the Route Map to embed circular**

**construction practices?**

The principle limiting factor in the proposals in this section is the lack of compliance and regulation. The construction sector is notoriously prone to cutting corners that may not be picked up during the “snagging” phase of finalisation. As building regulations get tighter to cope with the increased requirements of the Circular Economy and Green New Deal quality construction, compliance with those regulations because even more important. Small leaks in a “passive” house will compromise its thermal efficiency proportionately more than in a “conventional” house and a building where components are (for instance) quickly glued where they should have been fixed with wooden dowels may not be easily deconstructed and its materials reused. These failures will almost certainly not be proactively prevented without better inspection and compliance within the building sector.

**11. To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste? Please provide evidence to support your answer if possible.**

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

Again, many of the principles in this section are worthy but many are insufficient or counter-productive. In particular, the measures to encourage energy-from-waste and carbon capture run directly contrary to scientific evidence regarding climate targets. See, once again, Common Weal’s Common Home Plan for details.

**12. Are there any further measures that**

### you would like to see included in the Route Map to minimise the impact of disposal?

Additional measures should be extended to limit or even ban the export and import of waste (the latter being the source of our objection to energy-from-waste schemes). Countries that apply strict regulations around waste management (such as banning the incineration of plastic) but which allow that plastic to be exported to an incinerator elsewhere are only moving and hiding their own problems.

Once again though, a Circular Economy should be based from the start on the principle of product design and deconsumerisation to eliminate and reduce material use and prevent much of our waste in the first place. If Scotland's waste management system is based on fully "recycling" the waste of an ever-growing disposable consumer economy then it will fail.

### 13. To what extent do you agree with the measures proposed in this package to support action across the circular economy? Please provide evidence to support your answer if possible.

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

As mentioned before, packages such as support for Resource Libraries are welcome but only if they are on a scale sufficient to disrupt current practices. We know that Scottish Government Ministers understand that 100 Resource Libraries are not sufficient for this task and we argue strongly against their suggestion that it should be for the private sector to pick up the remainder.

We remain concerned that the Scottish Government does not understand the ramifications of a fully developed, multi-

loop Circular Economy and the need for it to deconsumerise our economy rather than just better recycle it.

### 14. Are there any further measures that you would like to see included in the Route Map to support action across the circular economy?

The Scottish Government should adopt, in full and without delay, Common Weal's comprehensive Green New Deal strategy as detailed in our Common Home Plan. Doing so not only supports a circular economy but forms a symbiotic relationship with it. One cannot work without the other.

### 15. To what extent do you agree with the principles proposed to underpin future circular economy targets? Please provide evidence to support your answer if possible.

Strongly agree

Agree

Neither agree or disagree

> **Disagree**

Strongly disagree

Bodies such as the UK's Climate Change Committee and the Intergovernmental Panel on Climate Change have made it clear that, like all governments, Scottish Government targets on climate change are too low to meet our obligations under the Paris Treaty, that stated policies and measures towards those targets are too low to meet them and any failure to deliver those policies on time and in full mean that even the stated impact of those measures will not be met.

The Scottish Government should start from a position of determining what actually needs to be achieved to meet scientifically mandated climate targets and then build a roadmap accordingly.

We object to the goal of “keeping pace” with the EU – a political body which is itself moving too slowly to meet the demands of the climate emergency. Scotland should certainly not fall behind the EU but should push ahead wherever and whenever possible. Doing so could, indeed, bolster Scotland’s eventual application as a member state of the EU which has historically offered greater place for member nations able to become substantial “policy uploaders” to the bloc rather than merely being passive members accepting policy as it is formed by others.

**16. Please provide any further information or evidence that should be considered in the accompanying Equalities Impact Assessment**

Failure to avert the climate emergency is already disproportionately affecting the Global South as well as many of those in Scotland who fall within the aegis of protected characteristics and this is liable only to get worse if the Scottish Government continues to fall short in its responsibilities.

**17. Please provide any further information or evidence that should be considered in the accompanying Fairer Scotland Assessment**

No answer given

**18. Please provide any further information or evidence that should be considered in the accompanying Island Communities Impact Assessment.**

No answer given

**19. Please provide any further information or evidence that should be considered in the accompanying Business and Regulatory Impact Assessment.**

No answer given

**20. Please provide any further information or evidence that should be considered with regards to the environmental impact of proposals outlined in the Route Map.**

No answer given