

PREVENTING HOUSEHOLD WASTE IN SCOTLAND

SUMMARY OF CONSULTATION RESPONSES

The consultation on Preventing Household Waste in Scotland was published by the Scottish Executive and SEPA on 6 February and ran until 28 April 2006.

Findings from the analysis of consultation responses, along with results from a consultation event and focus groups are intended to feed into the development of future plans for household waste prevention and an action plan on household waste prevention in Scotland. Results will also help to provide evidence to the Environment and Rural Development Committee on the Members' Bill proposing a levy on plastic bags.

The consultation posed a series of 42 questions, focusing on the main issues raised in the consultation document, and which were divided into 5 main sections: product designers and manufacturers, retailers, consumers, communities and local authorities.

A total of 170 responses to the consultation were received comprising 91 responses from organisations and 79 from individuals. Among organisations, the largest number of responses received was from local authorities while the consumer and political party sub-groups each submitted one response.

While the consultation document offered 42 questions for consideration, over half of all respondents (86) focused solely on the issue of the impact of plastic bags on the environment. This included a letter campaign which produced 37 identical responses. Table 1 below summarises the respondent profile.

Table 1
Respondent profile

Respondent Type	Number of respondents	Percentage of respondents (%)	Respondents – plastic bags issue only	Respondents – other questions
Academic / professional	3	2	-	3
Community council	9	5	-	9
Community sector	11	6	-	11
Consumer	1	1	1	-
Local authority	20	12	-	20
Manufacturer	8	5	1	7
Other public body	3	2	-	3
Packaging	16	9	10	6
Political party	1	1	-	1
Environment NGO	2	1	-	2
Retailer	8	5	4	4
Service industry	9	5	6	3
Sub-total Organisations	91	54	22	69
Individual	79	46	64	15
		figures are rounded		
TOTAL	170	100	86	84

In summarising the responses the same broad categories have been used as included within the original consultation.

PRODUCT DESIGN AND MANUFACTURERS

1. *Do consultees consider that the Scottish Executive, SEPA and the Enterprise Networks, or other bodies sponsored by the Executive, such as Envirowise, should do more to promote eco-design in Scotland?"*
2. *Should the Scottish Executive and SEPA carry out further work on "waste profiles" of products? If so, what?*
3. *Do consultees consider that the Scottish Executive should take further action in relation to the life-span of products? If so, what?*
4. *Bearing in mind that some products are always likely to be disposable, do consultees consider any action should be taken at EU, UK or Scottish level to minimise waste from disposable products? If so, what?*
5. *Would it be desirable and/or feasible to run an Integrated Product Policy pilot in Scotland? If so, for which product(s)?*

In summary,

- There was broad agreement for the need to promote eco-design in Scotland, although preferences for the best way to achieve this varied.
- There was also support for carrying out further work on the waste profiles of products, although views varied over which organisations should be involved in working on this. The highest level of support was for working with other government departments across the UK on either waste profiles or environmental profiles.
- In terms of product life span specifically, a need was defined for providing better information to consumers and providing more support to companies. There were also suggestions for changes to marketing materials to help encourage consumers to move away from a "disposable" lifestyle to one based on repair and recycling.
- For disposable products specifically, highest levels of support were for the introduction of producer responsibility legislation for disposable products.

A key theme emerging across all these issues was a need for campaigns to raise awareness of these issues or for education campaigns to help encourage better understanding of issues in relation to product design. Responses pointed to the need for a wide range of different bodies and organisations to work together on product design. The international nature of many of these issues was highlighted, with suggestions that some of these should be dealt with at a UK or EU level.

RETAILERS

6. *Do consultees consider that there is a need for guidance and support for retailers to build waste considerations into their procurement process? If yes, what guidance and support would be useful? It may be preferable to take this work forward at a UK, rather than Scottish, level.*
7. *Do consultees consider that retailers and their employees could do with further training, support and guidance on waste issues? If so, what?*
8. *Do consultees consider that food labelling requirements cause any conflicts with waste prevention? If so, what are these conflicts and what can be done to reduce them?*
9. *Do consultees consider that more could be done to collect and use surplus food from wholesalers, retailers, caterers and other outlets? If so, what?*
10. *Do consultees consider that action should be taken to reduce food waste in the home? If yes, what action should be taken? One possibility might be to produce guidelines on retail promotions and their waste implications. Legislation in this area might be time consuming, disproportionate and, in any event, more suitable at UK rather than Scottish level. Another option could be increased use of re-sealable packaging, to help food keep fresh for longer.*
11. *Do you think the Packaging (Essential Requirements) Regulations 2003 are working? If not, why not? What action could be taken to improve their operation*
12. *Could any further action be taken in Scotland to minimise household waste from packaging? If so, what?*
13. *Do consultees consider more could be done to encourage re-use either through deposit and return schemes or more generally? Options could include "reverse vending" trials in Scotland or trials of deposit and return schemes*
14. *Could more action be taken to reduce waste from the retailing of products?*
15. *Do consultees consider that retailers and manufacturers could provide more and better information on waste issues to their consumers? If so, what do consultees consider should be done?*
16. *Do consultees consider that an annual Waste Aware Scotland award for the retail sector would be useful? If so, what form should this take?*

In summary,

- There was broad agreement for a need for guidance and support for retailers to build waste considerations into their procurement process, and some suggestions that legislation is needed to back this up.
- Many consultees also voiced the need for further training for retailers and their employees. However, views were split as to what organisations should have responsibility for its delivery and there were comments that training needs to be tailored to different sectors and / or products.

- In terms of food waste specifically, there was a need for retailers to provide information to consumers, and that information relating to health and hygiene issues specifically should take priority over any packaging issues.
- There was general agreement that more could be done to collect and use surplus food from wholesales, retailers, caterers and other outlets, along with support for greater promotion of schemes in relation to this.
- A majority of consultees perceived a need to educate consumers on issues in relation to food waste, although there were suggestions that retailers also need to consider actions they can undertake to help reduce levels of consumer food waste.
- Views were relatively split as to whether the Packaging (Essential Requirements) Regulations 2003 are working. Some consultees noted that there is a lack of awareness on the part of some of these regulations and others commented on a lack of enforcement.
- While views were split over which specific options could be utilised to minimise household waste from packaging, a majority of consultees supported some form of action. Other comments included suggestions for an increase in the number of collection schemes or recycling sites.
- While there was support for re-use through deposit and return schemes, concerns were raised over their practicality and implementation or the type(s) of products best suited to these schemes.
- There was broad support for more action to be taken to reduce waste from the retailing of products, although views on how this could be brought about varied.
- Almost half of the consultees perceived a need for retailers to provide consumers with information and noted the importance of any information being clear, meaningful, useful and accessible.
- Offering a Waste Aware Scotland Award was perceived to be a positive move by around half the consultees.

CONSUMERS

17. *Do consultees consider that further action should be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services? Possible actions could include the provision of further information by Government, consumer bodies and retailers on how to complain about excessive packaging and waste.*
18. *Do consultees consider that environmental loyalty cards should be run in Scotland? It is likely that any such cards would have to be run by retail outlets. Is there any role here for the Scottish Executive and/or SEPA?*
21. *Do consultees consider that further action should be taken in relation to unwanted mail and leaflets? If so, what?*
22. *Do consultees consider that further action could and should be taken to promote home composting, food digesters or wormeries in Scotland? If so, what?"*

In Summary,

- There was majority support for further action to be taken to make it easier for consumers to raise environmental and waste issues with retailers and other providers of goods and services. That said, there were also suggestions that consumers need to be educated to raise their awareness of the issues or how they can complain about excessive packaging. There were also suggestions of a need for a change in consumer attitudes to create less of a “disposable goods” lifestyle.
- There was a level of support for some form of environmental loyalty card, although there were some concerns about how such a scheme would operate.
- In terms of unwanted mail specifically, a number of respondents noted the need for an increased awareness and promotion of the Mail Preference Service.
- There were calls for more composting initiatives and for wider publicity for existing initiatives.

PLASTIC BAGS

19. The consultation document listed 6 options in relation to plastic bags. And asked “*Which of the above options would consultees prefer in relation to the use of plastic bags?*”

The options were:

Option 1: to take no action specifically on plastic bags.

Option 2: to promote voluntary measures by retailers and other bodies handing out plastic bags.

Option 3: to introduce a levy on plastic bags, as proposed in Mr. Pringle's Bill.

Option 4: to introduce a levy 'upstream' (on suppliers of bags).

Option 5: to extend the levy to paper bags as well as plastic bags.

Option 6: to ban the supply of plastic bags to consumers altogether.

20. *What priority do consultees consider the Executive should give to reducing the use of plastic bags in the context of work to promote household waste prevention generally?*

In summary,

- When faced with a variety of options in relation to the use of plastic bags, the majority of consultees felt that no action should be taken. The two other options attracting a level of support were for either promotion of voluntary measures by retailers and other bodies handing out plastic bags or for the introduction of a levy on plastic bags, as proposed by Mr Pringle's Bill. A number of consultees felt that plastic bags are already re-used by many households.

- In considering the priority that the Scottish Executive should give to reducing the use of plastic bags, there was a distinct difference of opinion between those who responded solely to the questions on plastic bags and those who responded to the consultation as a whole. Consultees who dealt only with questions 19 and/or 20 on plastic bags felt that this issue should be given no priority or low priority. Analysis of responses from those responding to the whole consultation show the greatest number considered that this issue should be given high priority. In combining all responses, a small majority are in favour of assigning a low priority.

COMMUNITIES

23. *Do you consider more could be done to promote the re-use, repair and second-hand sector in Scotland? If so, what?"*
24. *Do you consider more work should be done to take a Scotland-wide over-view of the re-use of products such as furniture, paint and carpets? If so, what?*
25. *Do you could consider more could be done to promote community composting in Scotland? If so, what?*
26. *Do you think that current community waste funding sources are designed to encourage waste prevention projects? If not, what changes do you think are required?*
27. *Do consultees consider recycling credits should be mandatory? If so, why?*
28. *Do consultees consider that recycling credits should be extended to re-use and/or waste prevention?*

In summary,

- There was a general view that more could be done to take a Scotland-wide overview of the re-use of products such as furniture, paint and carpets, although many cited a need for more information or education for consumers and encouragement for those working in the re-use and repair sector. That said, there were also comments that it can be difficult to persuade consumers to consider re-use or repair for some low cost items. There were also suggestions for a sustainable and national network of schemes and the social benefit that this can bring to Scotland.
- The concept of community composting was supported by some consultees, although views were that this would work better in some communities than others.
- Views on whether current community waste funding sources are designed to encourage waste prevention projects were limited.
- A greater number of consultees supported making recycling credits non mandatory rather than mandatory. Alternatives suggested including giving local authorities decision making powers on this issue or development of service level agreements. There was also less support for extending recycling credits to re-use and / or waste prevention.

LOCAL AUTHORITIES

29. *Do consultees consider that there would be merit in a similar approach to Barnet's (making use of certain receptacles mandatory, to encourage recycling) being adopted by local authorities in Scotland? Clearly, before authorities in Scotland took any action of this type, they would need to be satisfied about the scope of the existing legislative powers in Scotland.*
30. *Should the Scottish Executive consider action in relation to the size of bins for residual waste provided by local authorities and/or the frequency of collection by local authorities? If so, what action should be taken?*
31. *Do you think that further research and guidance is required on green waste composting to minimise the effect on waste arisings?*
32. *Should the Scottish Executive consider amending the existing regulations allowing charges to be made for the collection of other types of household waste? If so, what changes should be made, and why?*
33. *Should the Scottish Executive consider issuing guidance on charging for special uplifts of bulky items and garden waste? If yes, what should the guidance say?"*
34. *Do consultees consider that it would be helpful to consider further the issues about "direct variable charging"? The next step would be to issue a full consultation paper on this subject, outlining the arguments for and against and the financial implications.*
35. *Do consultees consider the Scottish Executive should carry out further work on incentives? If so, what? One option would be trials of incentives with a number of authorities.*
36. *Do consultees consider that waste management contracts/service level agreements should include incentives for waste prevention? If yes, how is this best achieved? Do consultees consider that waste management contracts/service level agreements can currently include perverse incentives to increase the generation of waste? If yes, what can be done to tackle this?*
37. *Do you consider that contracts (other than waste management) let by local authorities have scope for provisions on waste prevention? If so, which ones? There is clear scope to minimise waste in construction, although this may not impact on household waste. The best time to make adjustments to contracts may be when they are due to be renewed/re-let.*
38. *Should the Scottish Executive take action to ensure local authorities do more on waste prevention? If so, what?*
39. *Should the Scottish Executive lay down targets on local authorities in relation to waste prevention? If so, what should these targets require and how would this be measured?*
40. *Do local authority officers require more training on the skills needed to encourage waste prevention? If so, what training is required and who should provide it?*
41. *Do consultees have any comments on the allocation of Strategic Waste Fund resources to waste prevention work?"*

In summary,

- A number of consultees agreed with the proposal for Scottish local authorities to adopt a similar approach to that adopted in the London Borough of Barnet, and some noted that some local authorities already operate similar schemes.
- When asked specifically about the size of bins provided by local authorities for residual waste, the greatest level of support was for advice on the size of residual bins and frequency of collections (the highest level of support coming from local authorities). However, there were some comments that services need to be tailored to specific areas or types of household.
- In terms of green waste collection specifically, there was support for further research and guidance on green waste composting to minimise the effect on waste arisings. Again, there were some calls for this to be tailored to individual areas. There were some concerns that kerbside collection serves to discourage composting.
- Although there was support for the Executive to consider amending the existing regulations allowing charges to be made for the collection of other types of household waste, there were some concerns over a possible increase in fly-tipping or other illegal disposal practices.
- Views on whether or not the Executive should consider issuing guidance on charging for special uplifts of bulky items and garden waste were split. If guidance is to be issued, the main point raised by consultees was the need for a fair, consistent, basic charging structure and guidance on this.
- From those commenting, there was majority support for direct variable charging. Similarly, there was majority support for the Executive to carry out further work on incentives, with some consultees noting the importance of “positive” measures to help bring about waste awareness. A pilot scheme was suggested by some consultees.
- A greater proportion of consultees agreed with the proposal for waste management contracts or service level agreements to include incentives for waste prevention than disagreed. A significant number also noted that there was scope for provisions on waste prevention in local authority contracts.
- A majority of consultees agreed that the Executive should take action to ensure local authorities do more on waste prevention, although funding for this was perceived by some to be an issue. It was also noted that other types of organisations also have a part to play in this. In terms of setting targets for local authorities in relation to waste prevention, a greater number of consultees agreed with this than disagreed, although there were some queries as to what targets should be set against. Some respondents also noted a need for training in this area.

OTHER ISSUES

42. *Are consultees aware of any other action which could be undertaken to prevent waste? If so, what?"*

The majority of comments from the 50 respondents answering question 42 summarised or reiterated points already made in their answers to previous questions.

The main points that were highlighted included:

- Education and raising awareness (11 respondents);
- Following successful examples from overseas countries (4 respondents);
- The need to change habits and attitudes (3 respondents);
- The need for manufacturers and retailers to play a part in waste reduction (3 respondents);
- The need for an holistic approach rather than individual initiatives (3 respondents);
- The anomaly in LATS regarding home composting (2 respondents);
- Facilities for recycling plastic (2 respondents);
- The need for action across all sectors (2 respondents);
- More work on eco-footprints (2 respondents).

CONCLUSIONS

Building on the results of this consultation, the Scottish Executive and SEPA plans to develop a Waste Prevention Action Plan.

LIST OF RESPONDENTS

Aberdeenshire Council
Accounting Services
Argyll & Bute Council
Association of Charity Shops
Ayrshire Household Recycling
B P I
Baggit Ltd
Belhelvie Community Council
Biobags Scotland Ltd
British Glass Manufacturer's Confederation
British Polythene Industries plc
British Property Federation
British Soft Drinks Association
Bunzl Retail
C B I Scotland
C R N S
Centre for Sustainable Consumption
City of Edinburgh Council
Community Repaint Project
Confederation of Paper Industries
Co-Operative Group

Crathes, Drumoak and Durris Community Council
Deer Community Council
Delux Blinds
Duddingston Wholesale Bakery Ltd
Dumfries & Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Esplanade Protection
East Lothian Council
Federation of Small Businesses
Friends of the Earth
Furniture Re-Use Network
Glasgow Packaging and Printing Ltd
Green Options
Heldon Community Council
Hendry Site Catering
Highland Council
Highlands & Islands Enterprise
HRNP

Industry Council for Packaging & The Environment
Inverclyde Council
L A C O R S
Larbert and Stenhousemuir & Torwood Community Council
Link Sustainable Scotland Task Force
Lochaber Environmental Group
Lothian & Borders Business Waste Aware Sub-group
Lothian and Edinburgh Environmental Partnership
M V G S
Macsnacks
Marks & Spencer
Mid Deeside Community Council
Midlothian Council
Moray Council
Moray Waste Busters
Munchables
New Pitsligo Community Council
NI Block Environmental Ltd
North Ayrshire Council
North Lanarkshire Council
Nova Mont SpA
NSCA Scotland

Packaging and Industrial Films Association
Perth and Kinross Council
Picnics Catering
Renfrewshire Council
Scottish Consumer Council
Scottish Environmental Services Association
Scottish Food and Drink Federation
Scottish Green MSPs
Scottish Grocers Federation
Scottish Natural Heritage
Scottish Retail Consortium
SIMPAC
South Ayrshire Council
Stonehaven and District Community Council
Thornhill & Blairdrummond Community Council
Trading Standards Institute
Valpac Ltd
W W F Scotland
Waste + Resources Action Programme
West Calder Express Ltd
West Dunbartonshire Council