

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

## **Fairer Scotland Duty Summary**

**Updated January 2024**

## Fairer Scotland Duty Summary

<p><b>Title of Policy, Strategy, Programme etc</b></p>	<p>Scotland’s Circular Economy and Waste Route Map to 2030 - consultation</p>
<p><b>Summary of aims and expected outcomes of strategy, proposal, programme or policy</b></p>	<p>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.</p> <p>Founded on evidence and collaboration, the Circular Economy and Waste Route Map is part of the Scottish Government’s wider response to these challenges. It is designed to drive progress on three key fronts:</p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. Setting out priority actions from now to 2030 to accelerate more sustainable use of our resources across the waste hierarchy.</li> <li>3. Reducing emissions associated with resources and waste.</li> </ol> <p>In 2022, the Scottish Government set out a range of proposals across the resources and waste system through its first <a href="#">Route Map consultation</a>. The consultation sought views on the feasibility and ambition of these proposals in order to drive progress against 2025 waste and recycling targets, and to achieve the long term goal of net zero by 2045. Earlier in 2023, the <a href="#">analysis</a> of responses to this consultation was published.</p> <p>Building on the first consultation, the Scottish Government has now published a draft Route Map, which seeks to prioritise and focus on the key actions that will unlock progress across the waste hierarchy to 2030. Through a second consultation on the draft Circular Economy and Waste Route Map, the Scottish Government is inviting</p>

views on these priorities, before the Route Map is finalised later in 2024.

The measures sit within four overarching strategic aims:

Strategic aim	Ambition and interventions
<p><b>REDUCE AND REUSE</b></p>	<p>Reducing and reusing waste are the first goals 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.</p> <p>In this section, we have three main objectives:</p> <ul style="list-style-type: none"> <li>• Drive responsible consumption, production and re-use</li> <li>• Reduce food waste</li> <li>• Embed circular construction practices</li> </ul> <p><b>Proposed actions</b></p> <p><b>Objective 1: Responsible consumption, production and re-use</b></p> <p><u>Priority action:</u></p> <ul style="list-style-type: none"> <li>• Develop and publish a Product Stewardship Plan to identify and tackle the environmental impact of priority products (2025-26)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Deliver a prioritised approach to the introduction of environmental charges for problematic products (by 2025)</li> </ul>

		<ul style="list-style-type: none"> <li>• Introduce a charge for single-use disposable cups (by 2025)</li> <li>• Consult on actions regarding the environmental impacts of single-use vapes (ongoing)</li> <li>• Review the feasibility of setting reuse targets (from 2025)</li> <li>• Develop restrictions on the destruction of unsold consumer goods (from 2024)</li> <li>• Develop measures to improve the reuse experience for consumers (ongoing)</li> <li>• Deliver behaviour change-based approaches focused on sustainable consumption, aligned to Let's Do Net Zero communications (ongoing)</li> <li>• Identify ways to expand business models that prolong product lifespan (ongoing)</li> </ul> <p><b>Objective 2: Reduce food waste</b></p> <p>Our Review of the 2019 Food Waste Reduction Action Plan outlines that we need to reset our approach to tackling food waste. The actions outlined below are based on the evidence we have so far on how best we can reset our approach. We welcome views on how to enhance this to ensure our reset delivers at the speed and scale required to see sustained food waste reduction results.</p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Deliver an intervention plan to guide long-term work on household food waste reduction behaviour change (by 2025)</li> <li>• Develop with stakeholders the most effective way to implement mandatory</li> </ul>
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		<p>reporting for food waste and surplus by businesses (by 2025/26)</p> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Strengthen data and evidence (ongoing)</li> <li>• Review the rural exemption for food waste recycling, as part of recycling codesign process (in 2024/25 and 2025/26)</li> <li>• Investigate feasibility of action plans (after 2025)</li> <li>• Deliver enhanced support for businesses (ongoing)</li> </ul> <p><b>Proposed actions</b></p> <p><b>Objective 3: Embed circular construction practices</b></p> <p><u>Priority action:</u></p> <ul style="list-style-type: none"> <li>• Support the development of regional Scottish hubs and networks for the reuse of construction materials and assets (from 2025)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• 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 (ongoing)</li> <li>• Investigate and promote options to incentivise and build capacity for the refurbishment of buildings (by 2026/27)</li> <li>• Investigate and promote ways to reduce soil and stones disturbance, movement and volumes going to landfill (by 2026/27)</li> <li>• Review opportunities to accelerate adoption of climate change and circular economy</li> </ul>
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		<p>focused purchasing in construction (from 2024)</p> <ul style="list-style-type: none"> <li>• Consider how devolved taxes can incentivise the use of recycled aggregates and support circular economy practices (ongoing)</li> </ul>
	<p><b>MODERNISE RECYCLING</b></p>	<p>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. By 2030, we want a high-performing recycling system that has modernised recycling services for households and businesses across Scotland, optimised 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.</p> <p>The objectives are grouped under:</p> <ul style="list-style-type: none"> <li>• Modernise household recycling and reuse services, improving and optimising performance.</li> <li>• Support businesses in Scotland to reduce waste and maximise recycling.</li> </ul> <p><b>Proposed actions</b></p>

**Objective 1: Modernise household and reuse services**

Priority action:

- Facilitate a co-design process with Local Government for high quality, high performing household recycling and reuse services (2024/25 and 2025/26)

Further actions:

- Develop a statutory code of practice for household waste services (by 2025/26)
- Introduce statutory recycling and reuse local performance targets for household waste services (from 2030)
- Strengthen the Householder's duty of care in relation to waste (by 2025/26)
- Give local authorities more tools to support household recycling and reduce contamination (by 2025/26)
- Undertake a review of waste and recycling service charging (by 2024/25)
- Review the monitoring and reporting framework for local authority waste services (by 2025/26)
- Develop options and consult on the introduction of end destination public reporting of household recycling collected (by 2027/28).

**Objective 2: Support businesses in Scotland to reduce waste and maximise recycling**

Commercial and industrial waste accounted for 28% of Scotland's waste in 2018. We want

		<p>businesses to have the information and support they need to reduce waste and maximise recycling, with clear incentives in place to ensure that the most sustainable choices are the easiest choices.</p> <p>The interventions in this theme are strongly linked to those outlined to reduce consumption across supply chains, such as product stewardship and charges/bans on unnecessary goods and products.</p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Review of compliance with commercial recycling requirements (2025)</li> <li>• Co-design measures to improve commercial waste service provisions (2026/27)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Conduct a national compositional study of waste from commercial premises (by 2025/26)</li> <li>• Investigate further steps to promote business-business reuse platforms (by 2027)</li> </ul>
	<p><b>DECARBONISE DISPOSAL</b></p>	<p>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</p>



		<p>up the waste hierarchy, and minimises broader societal impacts.</p> <p>The objectives are to:</p> <ul style="list-style-type: none"> <li>• Understand the best environmental outcomes for specific wastes</li> <li>• Ensure there is an appropriate capacity to manage waste</li> <li>• Improve environmental outcomes for waste through innovation</li> <li>• Incentivise decarbonisation of the waste sector</li> </ul> <p><b>Proposed actions</b></p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Develop and deliver a Residual Waste Plan to 2045 (develop by 2025/26)</li> <li>• Facilitate the development of a Sector-Led Plan to minimise the carbon impacts of the Energy from Waste Sector (by 2025/26)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Support the inclusion of energy from waste in the UK Emissions Trading Scheme (ETS), and investigate other fiscal measures to incentivise low carbon disposal (from 2028)</li> <li>• Review and target materials currently landfilled to identify and drive alternative management routes (from 2024)</li> <li>• Facilitate the co-production of guidelines for effective community engagement (process underway from 2024)</li> <li>• Increase the capture of landfill gas (by 2025)</li> </ul>
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	<p><b>STRENGTHEN THE CIRCULAR ECONOMY</b></p>	<p>Delivering a circular economy is not a simple task. It requires sustained transformational system change, and a range of actions that are both complementary and coordinated to drive sustainable management of our resources. If Team Scotland 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 across the circular economy.</p> <p>The objectives are to:</p> <ul style="list-style-type: none"> <li>• Provide strategic oversight and direction for the delivery of a circular economy in Scotland.</li> <li>• Coordinate action across cross-cutting areas to support progress across the waste hierarchy.</li> <li>• Robustly monitor and evaluate progress to enable agile working, take action where we are not on track, and learn from and implement what works.</li> </ul> <p><b>Proposed actions</b></p> <p><u>Priority actions:</u></p> <ul style="list-style-type: none"> <li>• Develop a Circular Economy strategy every five years (from 2025)</li> <li>• Set new circular economy targets (determined from 2025)</li> </ul> <p><u>Further actions:</u></p> <ul style="list-style-type: none"> <li>• Review and refresh Scotland's Waste Data Strategy's action</li> </ul>
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		<p>plan (development alongside new circular economy targets)</p> <ul style="list-style-type: none"> <li>• Maintain a programme of research on waste prevention, behaviour change, fiscal incentives and material-specific priorities (ongoing)</li> <li>• 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 (ongoing)</li> <li>• Support greater uptake of green skills, training and development opportunities (ongoing)</li> </ul>
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Because the route map is designed to support planning to 2030 and beyond, it must be recognised that not all policy measures are fully ready to be implemented in Scotland, and are at different stages of development. This is reflected in the draft Route Map.

Publishing the draft Route Map will not in itself result in impacts on those experiencing socio-economic disadvantage. However, it is possible that the subsequent implementation of interventions may have an impact. This will depend on how interventions are developed and implemented.

Alongside the first consultation on the Route Map proposals, we also consulted on a Circular Economy Bill to bring forward primary legislation to underpin our key policy measures. A [Fairer Scotland Duty Summary](#) was completed for the consultation on proposals for a Circular Economy Bill (2022). The Circular Economy (Scotland) Bill, was introduced in June 2023, and contains provisions that require primary legislation to underpin Scotland's transition to a circular economy, and modernise Scotland's waste and recycling services. If passed, the Bill will primarily deliver new powers that will set a framework for taking action into the future. The direction and actions set out in this Route Map are complemented by the

	<p>provisions in the Bill, and in some places are dependent on enabling powers created by the Bill if passed.</p> <p>A <a href="#">Fairer Scotland duty assessment</a> was undertaken and published for the Circular Economy (Scotland) Bill in June 2023.</p>
<p><b>Summary of evidence</b></p>	<p>Initially evidence was gathered and collated that should be considered in the development of individual interventions which are likely to impact directly on people and their communities. That evidence was shared and commented on during an initial public consultation in 2022.</p> <p>This document has been updated to include all relevant information gathered from this first consultation process. This document will be used during the development of individual Route Map interventions, as a basis for the development of detailed Fairer Scotland Duty Assessments where they are required.</p> <p><i>The poverty premium and affordability of living costs</i> Available evidence 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. This is noted especially for energy, communications and insurance, but also for food.<sup>1 2</sup> These issues may also impact those living in remote rural areas of Scotland.</p> <p>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. It has also been noted that foregoing quality goods can be used as a coping strategy for those on low incomes.<sup>3</sup> This implies a reliance on cheaper, potentially less durable goods. This may mean that low-income households face budget pressures if they are unable to avoid environmental charges (for example,</p>

<sup>1</sup> The poverty premium: a customer perspective, Personal Finance Research Centre, University of Bristol, 2020

<sup>2</sup> Paying more to be poor: the poverty premium in energy, telecommunications and finance, Citizens Advice Scotland and Consumer Futures Unit, 2016

<sup>3</sup> Life in low income families in Scotland, Centre for Research on Families and Relationships, University of Edinburgh, 2003

by purchasing a reusable coffee cup) or if retailers respond to the introduction of a ban on the destruction of durable goods by moving away from stocking entry-level or bargain products.

Whether these issues occur will depend on the design of individual measures and should be considered further prior to the design of measures. In the first consultation responses it was suggested that measures may be needed to support households purchasing long-lasting goods that will be more cost effective in the longer term but are initially unaffordable.

Within Scotland, 9% of households reported that they did not manage well on their incomes, with the proportion being higher for those on benefits (including the state pension).<sup>4</sup> Levels of perceived financial difficulty were also higher in more deprived areas, as measured by the Scottish Index of Multiple Deprivation, with 17% of households not managing well in the most deprived decile.<sup>5</sup> There are also connections to protected characteristics, with higher poverty rates for some groups.<sup>6</sup>

Those living in remote rural areas of Scotland also experience higher costs to achieve the same standard of living when compared to those in urban areas.<sup>7</sup> This may mean that those on an equivalent income in a remote rural area may be more likely to face financial difficulty.

All of these groups have the potential to be particularly impacted positively or adversely if the charges related to household waste services change as a result of the proposed review of waste and recycling service charging, or for example if they receive a fine for littering, or contamination of recycling. It is not yet possible to assess the likelihood or extent of any impact on those experiencing socio-economic disadvantage, as this would depend on how measures are designed and powers are implemented at the secondary legislation stage.

Care will be needed to ensure that any changes to the way in which household waste collections (for example, garden waste) are charged for or incentivised do not have an adverse impact on those experiencing socio-economic

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<sup>4</sup> Scotland's people annual report, National Statistics Publication, Scottish Government, 2019

<sup>5</sup> Scotland's people annual report, National Statistics Publication, Scottish Government, 2019

<sup>6</sup> Poverty & income inequality in Scotland: 2016-2019, Scottish Government, 2020

<sup>7</sup> A minimum income standard for remote and rural Scotland, Highlands and Islands Enterprise, undated

disadvantage and take account of any stigma around means testing in cost reduction for low-income groups. For example, low-income households may currently qualify for reduced, or at no cost, household waste collections for chargeable waste streams. When developing any intervention changes in the way household collections are paid for or incentivised, the potential impacts on those experiencing socio-economic disadvantage must be considered.

Respondents to the first consultation highlighted future policy development in other areas, such as investment in transport, infrastructure or community resources, as an opportunity to minimise potential increases to living costs as a result of any Route Map interventions.

#### *Implications for those supplying or using redistributed foods*

Evidence indicates that those experiencing socio-economic disadvantage face greater challenges regarding access to affordable, nutritious food and that there is a stigma associated with accessing emergency food provision. Furthermore, evidence shows food banks can struggle to provide nutritionally balanced food to their beneficiaries and there have been issues with the shelf-life of food provided.<sup>8,9</sup> Just under half of organisations providing food parcels in Scotland reported supplying fresh food<sup>10</sup>, suggesting that access to fresh food is currently limited for those reliant on these settings. However, this is not always the case.<sup>11</sup>

Responses to the first consultation suggested there may be opportunities to explore alternative ways to coordinate food redistribution and consumption rather than just to individual households. While no specific examples were highlighted there is an opportunity, as policies or interventions are further developed, for alternatives methods to be explored in more detail in future.

#### *Recycling rates*

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<sup>8</sup> Evaluation of the application of the provisions of the law of 11 February 2016 on the fight against food waste, and the implementing decree of 28 December 2016

<sup>9</sup> [Nutritional adequacy and content of food bank parcels in Oxfordshire, UK: a comparative analysis of independent and organisational provision](#)

<sup>10</sup> [Mapping organisations responding to food insecurity in Scotland](#)

<sup>11</sup> [More than meals: making a difference with FareShare food](#)

Recycling rates are variable across Scotland, varying both by geography, but also by housing type and levels of deprivation.

In particular, 2019 data indicated that the percentage of household waste recycled was substantially lower in the council areas of Glasgow, Dumfries and Galloway, Orkney, Shetland and Highland.<sup>12</sup>

Households living in flats, maisonettes or apartments are reported as having a lower rate of recycling for all materials, with the difference most marked for glass, based on 2017 data.<sup>13</sup> Recycling rates also show correlation with the Scottish Index of Multiple Deprivation, with recycling rates for all materials being below average in the 20% most deprived areas, and above average in less deprived areas, based on 2017 data.<sup>14</sup> The data does not show whether recycling rates vary by household income.

It is not yet possible to determine if these differences would mean that those experiencing socio-economic disadvantage are affected by changes to household recycling differently from those who are not disadvantaged, either in terms of the materials collected or the way that services are delivered or funded (e.g. garden waste collections).

It will be important that interventions focused on making changes to household recycling services are designed to ensure all communities have equitable access to recycling. Proposed interventions include a recycling co-design project with input from households, and statutory guidance on recycling service standards.

As individual measures are designed, it will be important that changes to household recycling collections are designed to ensure that they are appropriate and accessible for households regardless of geographical location, housing type or the level of deprivation of a community. For example, this will be particularly critical if the duty of care on households to recycle is strengthened, or additional measures to incentivise positive behaviours (eg waste reduction or increased recycling) are identified. The proposed co-design process is a key enabler to

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<sup>12</sup> Scottish household waste – summary data 2019, Scottish Environment Protection Agency, undated

<sup>13</sup> Scotland's people annual report 2017, National Statistics Publication, Scottish Government, 2018

<sup>14</sup> Scotland's people annual report 2017, National Statistics Publication, Scottish Government, 2018

involve households and communities in the design of future services.

#### *Impact on jobs*

The introduction of some interventions may provide training and skills development as well as job opportunities. This may impact positively those in precarious or low-paid jobs with demand for more high-skilled local labour. Consideration is also needed if low-income or insecure employment might be negatively impacted. When the relevant interventions are developed, there is a need to consider re-skilling to access new jobs and access of disadvantaged groups to opportunities.

#### *Reuse and socio-economic disadvantage*

There are already examples of reuse projects targeted at improving life for those experiencing socio-economic disadvantage, for example Circular Communities Scotland<sup>15</sup> and the UK-wide Reuse Network, which estimates it helped 1.5 million households in the UK in 2020.<sup>16</sup>

The introduction of some measures which would increase the access to affordable goods via secondary markets may have the benefit of normalising second-hand and reused goods. The socio-cultural complexities around using second-hand or reusable goods should be considered when developing relevant measures. For example, quality, style and cleanliness of clothing all play a role<sup>17</sup>, and perceived contamination in particular has consequences for rental services and second-hand exchange.<sup>18, 19</sup> However, care would be needed to ensure that organisations supporting communities experiencing socio-economic disadvantage are able to benefit from any measures.

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<sup>15</sup> [Circular Communities Scotland website](#)

<sup>16</sup> [Social impact report 2020, Reuse Network, 2021](#)

<sup>17</sup> Hur, E., 2020. Rebirth fashion: Secondhand clothing consumption values and perceived risks. *Journal of Cleaner Production*, 273, p.122951

<sup>18</sup> Ackerman, D.S. and Hu, J., 2017. Assuring me that it is as 'Good as New' just makes me think about how someone else used it. Examining consumer reaction toward marketer-provided information about secondhand goods. *Journal of Consumer Behaviour*, 16(3), pp.233-241

<sup>19</sup> Clube, R.K. and Tennant, M., 2020. Exploring garment rental as a sustainable business model in the fashion industry: Does contamination impact the consumption experience? *Journal of Consumer Behaviour*, 19(4), pp.359-370



	<p>The first consultation analysis highlighted that respondents believed it important that opportunities to access reused goods must be affordable and accessible for all – irrespective of socio-economic status.</p> <p><i>Urban and rural disparities</i></p> <p>The first consultation analysis highlighted that consideration is needed to identify and mitigate potential differences between the economic impacts of proposals in rural and urban communities.</p> <p>For all of these issues, further consideration will be needed via Fairer Scotland Duty Assessments prior to the development of specific interventions where appropriate.</p>
<p><b>Summary of assessment findings</b></p>	<p>This updated assessment has not identified the need for any changes to the proposals, because publication of the Route Map will not directly impact on those experiencing socio-economic disadvantage. Following the second public consultation for the Route Map, and any additional engagement or evidence gathering, this FSDA will be further updated as required.</p> <p>In addition, this assessment has identified that there is the potential for impacts once specific individual interventions are implemented. Further Fairer Scotland Duty Assessments should be completed where appropriate when specific interventions are being developed to ensure that any issues are fully considered and any changes necessary can be made to the proposals.</p> <p>It is worth highlighting that this may apply to interventions within the ‘reduce and reuse’ strategic aim relating to the application of environmental charges. Or those that relate to the supply or use of redistributed surplus food. Within the ‘Modernise recycling’ strategic aim; this would include interventions that relate to co-designing future services or reviewing the current approach to service charging.</p>
<p><b>Sign off</b></p>	<p><b>Name: Katriona Carmichael, 09/01/2024</b></p> <p><b>Job title: Deputy Director, Circular Economy Division, Environment and Forestry Directorate, Scottish Government</b></p>

