

Response ID ANON-EPBD-HXUK-U

Submitted to Delivering Scotland's circular economy: A Route Map to 2025 and beyond
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Package 1: Promote responsible consumption, production and re-use

1 To what extent do you agree with the measures proposed in this package to promote responsible consumption, production and re-use?

Strongly agree

Supporting evidence:

Marine Conservation Society Beachwatch Volunteers recorded an average of 346 items of litter per 100m of beach surveyed in Scotland during the 2021 Great British Beach Clean. More action is therefore clearly needed to move towards a Circular Economy to stop litter leaking into the marine environment. A survey conducted by YouGov for the Marine Conservation Society in 2022 found that three quarters of people in Scotland support Government action to transition to a circular economy (i.e., resources in use as long as possible, extracting maximum value from them, minimizing waste and promoting resource efficiency.), with only 2% of people opposed.¹ Both Scotland's seas and society are calling for the change and the Marine Conservation Society welcomes both the proposed Circular Economy Bill and Route map and supports the Scottish Government to be as swift, bold and ambitious as possible to fairly transition to a Circular Economy.

References

1. Survey conducted by YouGov, on behalf of the Marine Conservation Society. All figures, unless otherwise stated, are from YouGov Plc. Total sample size was 1,690 adults, of which 139 resided in Scotland. Fieldwork was undertaken between 14th - 15th Feb 2022. The survey was carried out online. The figures have been weighted and are representative of all GB adults (aged 18+).

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?

Further measures to include:

Reuse

In order to move from a single-use society to one which puts reuse at its core the Route Map needs to be as ambitious and swift as possible. We welcome the stronger focus on reuse in the proposals and recommend measures to raise awareness that we cannot recycle our way out of our current plastics crisis.

Supporting and encouraging best practise from business should be included. Some retailers such as IKEA and H&M, and clothes brands such as Rapanui, already offer to take back used items. This best practice should be built on and extended across the retail sector to include other product groups such as electrical items. If more retailers offered a take back scheme it would help mainstream re-use and encourage retailers to think about how they can re-use their products or materials instead of relying on new raw materials. It would also help to drive a further shift to circular product design which would result in products made from secondary materials and designed to retain value.

The Scottish Government's successful Baby Box scheme² added vouchers for reusable nappies³ after the public supported this addition, which we also welcome. We want to see further support for reusables being implemented as part of the Baby Box scheme to make it as easy as possible for new parents to choose reuse over single-use. Providing parents with a free starter pack of e.g., reusable nappies and wipes so they can try these is likely to improve uptake and how to achieve this should be featured in the Route Map. EPR on nappies should be used to support reusable nappy schemes as well as campaigns, ensuring correct and easy to understand labelling on products and clean-up costs.

Chemicals

It is essential that the use of chemicals is properly considered in the design of a circular economy and should feature in the Route Map, crucially that the circular economy is safe and free from hazardous chemicals. Overall, it is necessary to improve transparency and traceability of harmful chemicals to

ensure products are safe by design. For example, in some instances, chemicals intended for one purpose such as flame retardants in electronic equipment, have been recycled into other consumer products such as kitchen utensils or children's toys. Flame retardants are a by-product of their previous purpose, and through its new use, these chemicals are then included in products which shouldn't contain these chemicals, potentially a risk to health and/or the environment⁴. These considerations need to be included to ensure that a circular economy is safe and sustainable, and harmful chemicals are not just accumulating over time.

Importantly we also should not simply replace a single-use plastic item with one made from a "biodegradable" alternative as this perpetuates our linear make-use-throw society instead of reuse. It is important to note that alternatives to plastic and polystyrene food packaging often include paper, card or moulded fibre products. In order to maintain a suitably water or greaseproof material, the packaging is often treated with a chemical from the PFAS group (per and poly fluoroalkyl substances)⁵. PFAS are a group of over 4,000 chemically similar compounds, often nicknamed 'forever chemicals' because of their extreme persistence in the environment. These paper and board alternatives to plastic are often marketed as compostable or recyclable. However, composting represents a direct source of PFAS to the environment, and once there, they can persist for thousands of years, longer than much of the plastic they replace. Research suggests that PFAS concentrations have now exceeded planetary boundaries and due to the "poor reversibility of environmental exposure to PFAS and their associated effects" scientists are recommending that "PFAS uses and emissions are rapidly restricted"⁶. Those PFAS that have been analysed are known to be bioaccumulative and harmful to both wildlife and human health, linked to a wide range of problems including immune, liver, kidney and blood functions in marine mammals.⁷

Bans and Charges

Building on the implemented ban on the sale and manufacture of some of the most commonly littered single use plastic items, the Route Map should also include clear direction on who is responsible for implementing and enforcing such regulation and action. Other items in certain contexts should also be considered such as those highlighted in the recent call for evidence including single use plastic cigarette filters and the new rising market of disposable vapes.

We also support the suggested proposed action in the draft Route Map to 'develop a prioritised approach to charges and bans on environmentally damaging products' and that it should extend to all products that cannot be safely reused or recycled, except essential items with no current alternative.

We are a contributor to and signatory of the Scottish Environment LINK response and therefore agree that the charge being proposed for single-use beverage cups should be extended to single-use food containers. Take-aways and providers of on-the-go food should be required to offer to serve their food or beverage in reusable containers as they do in countries such as Germany. Upcoming schemes such as the Deposit Return Scheme for bottles and cans should also be used to design deposit return schemes for items such as reusable cups and food containers, again as they do in countries such as Germany. As this was consulted on back in 2019 we call on the Scottish Government to implement these charges as soon as possible.

Work to also prevent new harmful single-use items entering the market must also be undertaken at the same time. As a signatory to the Scottish Environment LINK response, we support the ask that new products need to demonstrate that it is 'Circular Economy Compatible' ideally by being repairable or reusable but at the very least being fully recyclable back into the same product.

Repair

We support the call for a Repairability Index which would require labelling on products explaining how repairable they are or as a minimum improved labelling to cover information such as lifespan, recycled content and recyclability.

Incentives to increase awareness and uptake of repair should be implemented such as repair incentive voucher schemes or to call on the UK Government to reduce VAT rates for repair.

As signatory to the Scottish Environment LINK response, we also support the other measures highlighted including measures linked to EPR and stewardship, consumption reduction targets and business models.

References

2. <https://www.mygov.scot/baby-box/>

3. <https://www.totsbots.com/blog/blog-post/scotland-gets-it-in-the-box>

4.

<https://www.sciencedirect.com/science/article/abs/pii/S0048969717321708#:~:text=BFR%20exposure%20via%20dermal%20contact%20with%20kitchen%20utensil>

5. <https://www.pfasfree.org.uk/wp-content/uploads/Forever-Chemicals-in-the-Food-%20Aisle-Fidra-2020-.pdf>

6. <https://pubs.acs.org/doi/10.1021/acs.est.2c02765>

7. Fair, P. A., et al. (2013) Associations between perfluoroalkyl compounds and immune and clinical chemistry parameters in highly exposed bottlenose dolphins, *Environmental Toxicology and Chemistry*, 32

Package 2: Reduce food waste

3 To what extent do you agree with the measures proposed in this package to reduce food waste?

Agree

Supporting evidence:

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

Further measures to include::

As signatories to the Scottish Environment LINK response, we agree that the measures are welcome, but neither strong enough nor comprehensive enough. We would like to see the mandatory reporting on food surplus and waste for businesses apply to catering outlets as well as food retailers and should also apply to their supply chains.

Package 3: Improve recycling from households

5 To what extent do you agree with the measures proposed in this package to improve recycling from households?

Strongly agree

Supporting evidence:

As members of Scottish Environment LINK, and signatories to the LINK response, we also welcome the measures in the package, in particular the mention of embedding recyclability in design and sale of products. We back the call for the introduction of Resource Efficiency requirements to ensure the recyclability of products not covered by Extended Producer Responsibility (EPR) measures.

We would also like to emphasise the importance of delivering a comprehensive re-use service as well as improving the current recycling service across Scotland.

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?

Further measures to include:

We look forward to the implementation of the Deposit Return Scheme for glass and plastic drinks bottles and steel/aluminium drinks cans in August 2023. Deposit Return Schemes can also be used for other forms of packaging and should be investigated for feasibility and implementation in Scotland as soon as possible.

Package 4: Improve recycling from commercial businesses

7 To what extent do you agree with the measures proposed in this package to improve recycling from commercial businesses?

Agree

Supporting evidence:

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

Further measures to include:

It is often cited that 80% of litter has a terrestrial source and that 20% derives from activities that directly litter at sea. Our citizen science evidence from our Beachwatch project identifies 12.7% of surveyed beach litter as from the fishing industry (2015-2020 data) indicating that improvements need to be made to reduce the amount of fishing gear lost at sea. Note that this percentage is lower than that calculated by the EU because 37.7% of beach litter recorded in Scotland by our volunteers is classified as "non-sourced". In other words, the source of the plastic, metal or wood item from which a "non-sourced" piece derived can no longer be identified. The figure for fishing-derived litter is therefore likely to be considerably higher. The figure will

also likely be higher as many beaches along the rural coasts of northeast and northwest mainland Scotland and the islands have such high volumes of litter, including fishing and aquaculture waste, that with our Beachwatch Survey methodology over 100m, or even 12m, it is not possible for volunteers in the usual timescales of up to two hours per survey to collect and record all litter present.

This issue was also raised during an event facilitated by the Coastal Communities Network (CCN) and the Scottish Islands Federation (SIF) with several communities raising concerns around the level of fishing and aquaculture gear washing up on island and mainland west coast beaches. Measures to improve the circularity and recycling of fishing and aquaculture gear were highlighted in the consultation earlier this year on an updated Marine Litter Strategy for Scotland. We welcomed the measures highlighted on improving the circularity and recycling of fishing gear and called for redundant or end of life aquaculture gear to also be included. We look forward to the new strategy being published and would recommend reference to these actions is included in the route map to ensure a strong source to sea link is established and that all aspects of Scotland's economy is included in fairly transitioning to a Circular Economy.

We would also like to see improved procurement practises to facilitate the transition to a circular economy and for Scotland to work with businesses to develop a toolkit which enables businesses to report positively on their steps taken towards a circular economy, similar to that of carbon reporting.

An example of successful measures to fit within a circular economy model in relation to commercial food production is the feeding of certified organic farmed fish. Organic certification standards, such as those owned by Soil Association and Naturland, require the marine proteins and oil components of the feed fed to farmed fish to be comprised of by-products and trimmings derived from processing waste, as part of their hierarchy of sourcing. This not only achieves the circular economy objective of reducing waste (and importantly protein), but results in lowering the farmed species Forage Fish Dependency Ratio (FFDR). FFDR is a calculation used in global aquaculture to ascertain the amount of whole wild caught fish it takes to produce 1 kg of farmed fish.

When carrying out the scientific assessments that underpin the ratings for the MCS Good Fish Guide⁸, the sourcing and use of feed plays an important role in determining overall environmental impact. The FFDR is a key indicator question in ascertaining relative sustainability. Organic farmed fish perform well in this section as the marine proteins and oils are sourced from processing waste, resulting in the maximum positive score. This, in turn, leads to the higher overall rating for organically farmed fish. The Good Fish Guide ratings underpin the buying decisions for over 20% of seafood meals a year sold in the UK. Incentivisation and support for both the processing and fish feed industries to maximise waste capture to enable more aquaculture businesses to follow a similar circular model should be investigated as another measure in the Circular Economy Route Map. It is therefore also crucial that there is integration with the Blue Economy Vision and Action Plan. For consistency, the vision and Action Plan should therefore also deliver a Circular Blue Economy.

References

8. <https://www.mcsuk.org/goodfishguide/>

Package 5: Embed circular construction practices

9 To what extent do you agree with the measures proposed in this package to embed circular construction practices?

Not Answered

Supporting evidence:

10 Are there any further measures that you would like to see included in the Route Map to embed circular construction practices?

Further measures to include:

Package 6: Minimise the impact of disposal

11 To what extent do you agree with the measures proposed in this package to minimise the impact of the disposal of residual waste?

Agree

Supporting evidence:

12 Are there any further measures that you would like to see included in the Route Map to minimise the impact of disposal?

Further measures to include:

During the Circular Economy event with CCN and SIF it was highlighted that the majority of end-of-life fishing gear ends up in landfill and the small percentage that gets recycled is done so outside of the UK⁹. We supported measures outlined in the consultation for the updated Marine Litter Strategy for Scotland and would again recommend cross referencing work with the Circular Economy Route Map to ensure join up. This includes creating and improving access to local recycling opportunities to reduce the impact of the high tonnage of waste currently going to landfill from Scotland's fishing sector. It is crucial therefore that there is integration with the Blue Economy Vision and Action Plan. For consistency, the vision and Action Plan should therefore also deliver a Circular Blue Economy.

References

Package 7: Cross-cutting measures

13 To what extent do you agree with the measures proposed in this package to support action across the circular economy?

Agree

Supporting evidence:

Although the Circular Economy Bill proposals include reference to the work being undertaken through the Marine Litter Strategy marine sectors are not include in the route map. To ensure link up across different policy areas we would like to see the work proposed under the Marine Litter Strategy linked to the Circular Economy Route map. This should include both work to improve the circularity of Scotland's fishing and aquaculture industries as well as Scotland's sewer system. It is therefore crucial that there is integration with the Blue Economy Vision and Action Plan. For consistency, the vision and Action Plan should therefore also deliver a Circular Blue Economy.

We also support the call for stronger measures on procurement by Scottish Environment LINK to ensure that the norm for public spending aligns with circular economy principles.

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

Further measures to include:

Sewage Sludge/Biosolids

Sewage sludge provides an excellent case study of why we must prioritise stopping pollutants at source if we are to achieve a clean circular economy. The treatment of wastewater generates sludge, a semi-solid material. In the UK, a large majority of treated sludge (also known as biosolids) is applied to agricultural land as a fertiliser. This is an example of the circular economy where a waste product is reused, providing benefits as a soil conditioner and a source of nitrogen and phosphorus. However, sludge is known to contain contaminants such as microplastics and PFAS, which currently cannot be removed during the treatment process and are highly persistent in the environment. If sludge is to continue being spread on agricultural land to support a circular economy, levels of contaminants must be controlled at source and outdated sludge regulations and monitoring must be updated to be fit for purpose. For example to stop microfibres entering the waste water system from washing, machines must be fitted with microfibre filters, the use of intentionally added microplastics must be restricted (for example in cosmetic and cleaning products) and all PFAS must be banned from all non-essential uses.

See the MCS sewage sludge paper for more information and recommended interventions:
https://media.mcsuk.org/documents/MCS_sewage_sludge_paper_june_2021_final.pdf

Awareness Raising

We are a contributor to and signatory of the Scottish Environment LINK response and therefore agree that there needs to be a sustained general awareness-raising campaign to increase understanding of what a circular economy is, why we need one and how everyone can get involved, as well as a commitment to following the principles and practices of Just Transition.

EPR and Parallel Policies

We recognise that EPR is a reserved matter, however we would like to see the Scottish Government put more pressure on the UK Government to deliver ambitious EPR programs and to implement those aspects of EPR that the Scottish Government has the power to. Action on modulated fees to incentivise reusable packaging should be implemented and funds raised from EPR could go to supporting local reuse and repair initiatives.

Parallel policies that must be built on and developed to go alongside EPR include;

Market Restrictions

Bans on landfill and incineration of plastic waste

Bans on export/import of plastic waste

Bans on hazardous chemicals

Support for Sustainable Product Design

Implementation of Minimum recycled content requirements

Improving Green Public Procurement

Corporate Social Responsibility

Transforming Scotland's economy into a truly circular one will require the bold regulatory and fiscal suggestions outlined in the Marine Conservation Society response and the Scottish Environment LINK response to which we are a signatory. However, progressive, environmentally and socially responsible businesses can of course introduce measures and business practices of their own volition that are environmentally and socially responsible and that move their own business models toward circularity. This not only makes social and environmental sense, but also good business sense. It is useful to highlight examples of good practice in the real economy that can inspire and encourage other businesses.

One such example is the Dornoch Environmental Enhancement Project (DEEP), instigated by the Glenmorangie Company and of which the Marine Conservation Society is a proud founding partner with Glenmorangie and Heriot-Watt University. The Glenmorangie Company wanted to go far beyond legal compliance and so invested in a multimillion Euro Anaerobic Digestion Plant to reduce the chemical oxygen demand (COD) of their waste water by 95%. However, wanting to go even further the company wanted to actively help enhance the Dornoch Firth, inviting Marine Conservation Society and Heriot-Watt University as partners, together founding the DEEP project.

The DEEP vision is to reintroduce native oysters to the Dornoch Firth to help return the Firth to a previous richer ecological condition, to purify the final 5% of licensed distillery discharge and provide an exemplar for other native oyster restoration projects throughout Scotland, the UK and Europe. Since 2017, a total of 20,000 native oysters have been returned to the Dornoch Firth by DEEP. Initial results from Heriot-Watt University suggest the project is viable with the next milestone a total of 200,000 native oysters in the Firth by the end of 2023, and an ultimate goal of some four million native oysters covering around 40 hectares. Complex native oyster habitat can help export oyster larvae to the adjacent Moray Firth and provide nursery habitat for juvenile fish and other shellfish species.

Back onshore, the circular story continues, as the copper-rich solid waste from the anaerobic digestion plant, with copper coming from the whisky stills, is provided to local farmers who can use it to help fertilise the local fields, where the soil coincidentally is copper poor, and the heat captured by the digestion plant is recycled back into the distillery.

Beyond 2025

15 To what extent do you agree with the principles proposed to underpin future circular economy targets?

Agree

Supporting evidence:

We are signatories to the Scottish Environment LINK response and therefore fully support the points made in answer to this (and all other) questions, including fully agreeing with Principles 2 and 4 and with Principles 1 and 3, but subject to the following adjustments suggested in the LINK response:

Principle 1: Achieve net zero by 2045 – future targets should align with net zero consumption emissions, rather than territorial emissions which don't take account of emissions from the goods we import from other countries.

Principle 3: Maximise the value of our circular economy – if value is taken in the wider sense, to include the true social value, then we agree with this principle. We caution against being driven by market value.

We also support the suggestion for a 5th Principle: Achieve nature positive by 2030. Some damaging aspects of our linear economy, especially the leakage of harmful materials, impact biodiversity and would not necessarily be covered by the other principles

About you

21 What is your name?

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23 Are you responding as an individual or an organisation?

Organisation

24 What is your organisation?

Organisation:

Marine Conservation Society

25 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

26 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

27 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

28 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: